

From: [Jenna Kay](#)
To: [Cnty 2025 Comp Plan](#); [Jeffrey Delapena](#)
Subject: FW: Planning Commission Meeting Comments
Date: Thursday, August 7, 2025 4:43:34 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Jeff, you probably already got this, but I recommend including these additional notes in the comp plan record.

From: Irene Finley <finley.m.irene@gmail.com>
Sent: Thursday, August 7, 2025 4:06 PM
To: Jenna Kay <Jenna.Kay@clark.wa.gov>
Cc: Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Subject: Re: Planning Commission Meeting Comments

Sweet. One stop shopping. Thanks for your response.

I have spent many hours reviewing the Climate Element and I know the specific ones you mention. County-owned focus as one goal and your repeating that sentence about County controlled at the meeting made me nervous. Thanks for including the words, protecting trees. When the document uses words like, planting, in specific and repeated ways vs tree protection with little detail like target tree retention or prioritize tree retention, my reaction is to assume the worst. The nature of the urban growth area is growth, so I would like to see a priority to retain and protect trees specific to the UGA. Otherwise, I see it as yet another exploitation of the residents of the urban growth area.

Once the evaluation of tree canopy in the UGA is done, we will have something to measure. I have a fondness for measurable goals. I will be looking for definitions of legacy and old growth trees in the Glossary since you use them in the policy. I would like to see some kind of a date projection for a tree retention and protection policy. Like Sue M said at the meeting, we have an urgent climate crisis. If nothing else, please define in the glossary what it means to remove a tree. This cannot wait.

Given that I live in a holistic habitat inside and outside of my walls, you would think I would support the word holistic in your policies. I don't. Resilient and sustainable are plenty good enough. I would say holistic is too woke but then it was a word we used a lot in the hippie days. Like synergy, I don't think it is an appropriate term for the Comp Plan. If someone comes up with synergy holistic ____ (fill in the blank), you are in real trouble.

Irene Finley

On Thu, Aug 7, 2025 at 1:01 PM Jenna Kay <Jenna.Kay@clark.wa.gov> wrote:

Hi Irene,

Thanks for your message. I'm writing regarding the three additional questions in your email. Please find responses below in green.

1. The GMA requires an evaluation of the tree canopy in the Urban Growth Area specifically. I have read a report that is available on line but I cannot find where it specifically addresses the UGA? It just seems to split urban and rural.

You're correct in that the GMA was recently updated to include a new requirement in the Parks and Recreation Element that includes an evaluation of tree canopy coverage within the urban growth area. This information will need to be incorporated into this element. Full draft chapters are still in progress, so you'll be able to review this information in the future.

I'm not entirely sure what evaluation you were looking at that you're referencing, but can confirm the comprehensive plan has not yet been updated with the information to fulfill this new requirement.

2. If Clark County partners with the WSU Heritage Trees program, where do I find that information on the Clark County website and in the Comp Plan? If there is an entity who can help establish heritage trees in the Urban Growth Area, I would like to be in touch.

The WSU Heritage Trees program is run through WSU-Extension; it is not a county-led program. You can find more about the program here: <https://extension.wsu.edu/clark/master-gardeners/community-education/heritage-tree/>

3. In the presentation to the Council on the Climate Element, Jenna Kay said twice that "tree loss is not in the County's control." I do not understand why that is so.

The WA State Forest Practices Act regulates forest practices on private and state lands and local governments only have authority on forest practices in very limited situations. As such, there is a lot of forested land in the county where the county legally has no regulatory role related to the trees. My comments were in reference to this. Local governments can take action regarding trees that don't fall under forest practices, or as allowed under the forest practices act, so this would relate to urban forestry and some other instances. I recommend you take a look at the proposed draft climate element policies related to trees. Here's a [link to the draft](#) policies. See goals and

policies 14.9 through 14.11.3. If policy 14.9.2 is adopted, implementation of that policy would be how examples like you provided from Covington could be addressed in the county.

From: Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>

Sent: Thursday, August 7, 2025 11:39 AM

To: finley.m.irene@gmail.com

Cc: Jenna Kay <Jenna.Kay@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>

Subject: RE: Planning Commission Meeting Comments

Good day, Irene,

Thank you very much for your feedback related to the Comprehensive Plan Update. Just as a friendly reminder, there will be no public testimony at tonight's Work Session and the topics to be discussed are not related to the Comprehensive Plan. Tonight's agenda items are listed below:

- CPZ-2025-00001 2026-2031 Transportation Improvement Program (TIP)
- CPZ-2025-00002 2026-2031 Stormwater Capital Plan
- CPZ-2025-00003 2026-2031 Parks and Nature Capital Improvement Plan

I will ensure your comments are added to the Comprehensive Plan Index of Record. I am forwarding your additional questions to members of Community Planning Staff who may be able to assist or point you in the right direction.

Best regards,



Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558



From: Irene Finley <finley.m.irene@gmail.com>
Sent: Thursday, August 7, 2025 11:23 AM
To: Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Cc: Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Sue Marshall <Sue.Marshall@clark.wa.gov>
Subject: Planning Commission Meeting Comments

EXTERNAL: This email originated from outside of Clark County. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I plan to attend the Planning Commission meeting tonight. I would like the Commissioners to know that I support Clark County Comprehensive Growth Management Plan to create tree retention/protection in the urban growth area.

I feel strongly that Tree Removal should be clearly defined in the proposed glossary for the new Comp Plan as it is in other jurisdictions, including the City of Vancouver.

I do not know to whom I should direct the following questions, maybe you have a resource who can respond?

1. The GMA requires an evaluation of the tree canopy in the Urban Growth Area specifically. I have read a report that is available on line but I cannot find where it specifically addresses the UGA? It just seems to split urban and rural.
2. If Clark County partners with the WSU Heritage Trees program, where do I find that information on the Clark County website and in the Comp Plan? If there is an entity who can help establish heritage trees in the Urban Growth Area, I would like to be in touch.
3. In the presentation to the Council on the Climate Element, Jenna Kay said twice that "tree loss is not in the County's control." I do not understand why that is so.

Attached is a Word document with examples about tree prevention/retention from Covington City. (I see from your email that when I copy and paste from a web site, the formatting comes with it, even though it does not show up on my screen. Sorry about that difficulty in reading...)

Irene Finley
Council District 2
West Minnehaha neighborhood
LD 49

Examples from Covington City

“Clearing” or “land clearing,” for purposes of this chapter, means the direct and indirect removal of trees, including topping and limbing, from any public or private undeveloped, partially developed, or developed lot, public lands, public right-of-way, or utility easement. This shall also include any destructive or inappropriate activity applied to a tree that will result in its death or effectively destroy the functionality. “Clearing” shall not include landscape maintenance, brushing, or pruning consistent with accepted horticultural practices which does not impair the health, survival, or function of trees.

“Critical root zone (CRZ)” means the International Society of Arboriculture (ISA) definition of CRZ, which is an area equal to a one-foot radius from the base of the tree’s trunk for each one inch of the tree’s diameter at four and one half feet above grade (referred to as Diameter at Breast Height). Example: A 24-inch diameter tree at four and one half feet above grade would have a critical root zone radius (CRZ) of 24 feet. In this example, the total protection zone, including trunk, would be 50 feet in diameter.

“Heritage tree(s)” a significant tree that is equal to or greater than thirty-two inches DBH.

“Protected tree” means a tree and associated understory vegetation that is identified for retention and protection on an approved tree protection and replacement plan and/or permanently protected by easement, tract, or covenant restriction.

“Remove” or “removal” is the act of removing a tree by digging up, cutting down, or any act which causes the tree to die within a period of three years, including, but not limited to: damage inflicted on the root system by machinery, storage of materials, or soil compacting, or changing the ground level in the area of the tree’s root system; damage inflicted on the tree permitting infections or infestation; excessive pruning; topping; paving with concrete, asphalt, or other impervious material within the drip line; or any other action which is deemed harmful to the tree.

