

**From:** [Jeffrey Delapena](#)  
**To:** [Steve Thalberg](#); [Cnty 2025 Comp Plan](#)  
**Cc:** [Oliver Orjiako](#); [Jose Alvarez](#); [Jenna Kay](#)  
**Subject:** RE: comment on the comprehensive plan update - regarding health, trees and the environmental impact statement (EIS) for the CGMP  
**Date:** Thursday, August 21, 2025 8:06:43 AM  
**Attachments:** [^ Environmental Impact Statement.docx](#)  
[image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

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Good day, Steve,

Thank you for submitting this feedback in relation to the 2025 Comprehensive Plan Update. This has been forwarded to additional members of Staff and will be entered into the Index of Record.

As Jenna had stated in her response to you yesterday, while the project timeline dates are subject to change, currently the public review of the DEIS is scheduled for this fall between October 1<sup>st</sup> through November 30<sup>th</sup>. Council and Planning Commission Work Sessions are scheduled to begin in November.

Feedback for the Planning Commission can be sent to myself, as the Clerk of the Commission, or to the Comprehensive Plan inbox ([comp.plan@clark.wa.gov](mailto:comp.plan@clark.wa.gov)).

Feedback for the Council can be sent to the Clerk to the Council, Rebecca Messinger ([Rebecca.Messinger@clark.wa.gov](mailto:Rebecca.Messinger@clark.wa.gov)) or to [publiccomment@clark.wa.gov](mailto:publiccomment@clark.wa.gov).

Best,



**Jeff Delapena**  
Program Assistant  
COMMUNITY PLANNING

564.397.4558



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**From:** Steve Thalberg <[sathalberg@gmail.com](mailto:sathalberg@gmail.com)>

**Sent:** Wednesday, August 20, 2025 8:11 PM

**To:** Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>

**Cc:** Sue Marshall <Sue.Marshall@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>; Matt Little <Matt.Little@clark.wa.gov>

**Subject:** comment on the comprehensive plan update - regarding health, trees and the environmental impact statement (EIS) for the CGMP

**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.

dear planning commission,

please accept the attached comments that address the Environmental Impact Statement (**EIS**) portion of the Clark County Comp Growth Management Plan (**CGMP**).

these comments address issues in the proposed CGMP:

chapter 1 - land use, particularly 1.1.19, 1.6.3, 1.6.4;

chapter 4 - environment;

chapter 14 - climate, particularly 14.9 and 14.10;

and the Environmental Impact Statement (if it is separate from the above chapters of the CGMP).

there may be other pertinent chapters and sections for which my attached document is pertinent, if so, please forward my attached comments to those pertinent sections.

please provide to me confirmation of receipt of the below testimony.

should i also submit this document closer to the time that the planning commission addresses the issues that i have raised?

if so, when, and to what e-mail address?

sincerely,

steve thalberg, md

cc: clark county councilors.

Environmental Impact Statement (EIS) portion of the Clark County Comp Growth Management Plan (CGMP).

With the passage of E2SHB 1181 during the 2023 Washington state legislative session, Clark County is now required to add a Climate Change Element to its Comprehensive Plan by December 31, 2025.

Please consider the following comments for the Environmental Impact Statement portion of the Comprehensive Growth Management Plan for Clark County.

Trees benefit long-term health of the local neighborhood citizens, improve neighborhood value, decrease summertime energy use and costs, and have an unmatched positive benefit-cost ratio.

1. Health benefits of trees far outweigh any of the other benefits.
2. Urban trees have not been properly included in Clark County's EIS, nor in the CGMP for Clark County.
3. Need to include the health benefits of trees, forests, and green spaces in order to make proper political decisions.
4. Trees can absorb air pollution, and air pollution is a risk factor for health problems.
5. Trees grow slowly, therefore need to plan now for future benefits.
6. There is strong link between greenness of neighborhood and health.
7. Climate change results in more tree mortality. The County need to step up and improve their policy of replacing dying/dead trees.
8. There is currently a failure to see trees as a community resource. This can literally be a matter of life and death. The benefits of trees on a lot spill over to the whole neighborhood.
9. There is a trend towards replacing single family dwellings with multifamily homes. Frequently this entails cutting down trees on the lot to make room for the larger multifamily dwelling. This has a negative impact on health and the economy. Preservation of large trees should be part of the permitting process for construction permits.

Clark County should dramatically increase its efforts at planting neighborhood trees, and protect habitat corridors and green spaces:

1. Longitudinal studies have found that planting of trees results in a decrease of non-accidental, cardiovascular, lower-respiratory, and accidental mortality. These studies were performed in Portland, Oregon, so they certainly pertain to the situation in Clark County.

The dose-response association between tree planting and non-accidental mortality increased in magnitude as the trees aged and grew. Each tree planted in the preceding 1-5 years was associated with a mortality rate of -0.154, whereas each tree planted in the last 6-10 and 11-15 years was associated with a reduction in mortality rate of -0.262 and -0.306, respectively.

The study estimated that planting a tree in each of Portland's 140 census tracts would generate \$14.2million in annual benefits. In contrast, the annual cost of maintaining those 140 trees would be under \$13,720. This results in a cost savings of over \$100,000 per tree planted.

The benefit-cost ratio is 1,727:1.

Very few other interventions by the County can result in such a huge return in benefits.

<https://doi.org/10.1015/j.envint.2022.107609>.

## Trees and Health & Prosperity

### 2. There is a link between trees and human health:

Trees lost from the emerald ash borer, which poses no direct threat to humans, killed more than 100million trees in the united states, was associated with an additional 15,000 deaths from cardiovascular disease and an additional 6,000 deaths from lower respiratory disease. Deaths occurred at higher rates in wealthier counties, where more trees are typically found in urban areas.

USDA Forest Service Science Findings, issue 158, Jan/Feb 2014, Pacific NW Research Station.

### 3. There is a positive association between urban trees and birth outcomes:

Study location: Portland, Oregon.

Greater tree canopy cover within 50 meters of the mother's house was associated with a reduced risk of having an underweight baby. Exposure to the natural environment reduces stress levels, which may be the source of improved birth outcomes.

Houses fronted with more street trees experienced lower crime rates, as did houses with large yard trees.

USDA Forest Service Science Findings, issue 137, Nov 2011, Pacific NW Research Station.

### 4. Street trees increase home prices by \$8,870 in Portland, Oregon, and a neighborhood tree growing along the public right-of-way added an average of \$12,828 to the combined value of all the houses within 100 feet.

Shade trees reduce household energy use by an average of \$25.16/month in summertime, in Sacramento, California.

USDA Forest Service Science Findings, issue 126, Sept 2010, Pacific NW Research Station.

Clark County's revised CGMP should reflect the above concerns and the County should encourage compliance with the above (by educational outreach, volunteer opportunities, coaching opportunities, code and ordinances, grants, credits, and/or other incentives).

Respectively submitted,  
Steve Thalberg, MD.