

From: Jenna Kay
To: Cnty 2025 Comp Plan; Jeffrey Delapena
Subject: FW: CLARK COUNTY CONSIDERATION OF THE CLIMATE CHANGE/HOUSING OPPORTUNITY FROM THE PROPER CLEANUP OF THE CAMAS MILL
Date: Tuesday, September 30, 2025 2:31:16 PM
Attachments: image001.png
image002.png
image003.png
image004.png

For comp plan record

From: Randal Friedman <randalfriedman@gmail.com>
Sent: Tuesday, September 30, 2025 12:07 PM
To: Jenna Kay <Jenna.Kay@clark.wa.gov>
Cc: Heidi Cody <heidi@waconservationaction.org>; Don Steinke <crvanwash@gmail.com>
Subject: Re: CLARK COUNTY CONSIDERATION OF THE CLIMATE CHANGE/HOUSING OPPORTUNITY FROM THE PROPER CLEANUP OF THE CAMAS MILL

Jenna I understand the planning process. I disagree that the County can ignore the full context of Camas' plan in making their own, independent legislative action to change the UGB. You are under no obligation to comply with Camas' or any other similar request. Your obligation is to consider the full public interest.

This growth-opening door has been kept from the Camas City Council and public for direct discussion and transparency. It is not shown on the Proposed Land Use Map. Despite what Camas is used to dealing with, the county and communities are not a rubber-stamp. This is not the GMA in our era of climate change with the clock ticking. Respectfully, at this point this decision perhaps its more appropriately made by the State of Washington away from whatever local "debts" are considered "owed" to legacy families. Future generations should not pay this debt without full consideration of how this will fundamentally change SW Washington. I've been told about that phantom debt directly.

The county has an obligation to consider the full potential impacts of removing ag protections, moving the UGB and accepting MF-18 as the new zoning. The capacity of that zoning is 2,700 units. 5,000 new residents could be introduced as a prelude to essentially a new city beyond Camas High School. How will they be served?

My question remains whether the county will consider the potential impacts of Camas' proposed action. Moreover, this is your action. This is your addition to the county's carbon footprint. This is the county's contribution to pollution and traffic. Unless, of course, you believe the county is merely a rubber stamp.

Respectfully I understand planning. There are three levels of government in Washington with checks and balances. I will do my best to make sure the County Council has the full facts and context of this action should staff go ahead with Camas' proposal. I am and will be on the record. I won't wait until the formal public comment. Coming from a planning background I understand that by the time the formal comment period happens the plan will be "baked". The public will face a daunting challenge to seek otherwise. There is recourse with the state as well.

I've heard stories of how the county used to plan and have been through some sad examples. How many more Green Mountains will be approved in the rural East County landscape? Here I thought there was a new ethos in Clark County matching the new Council's views.

No where in your reply indicates a willingness to talk so I presume it really is between the Council and citizens now.

I am co-hosting a community conversation in Camas to support the free-flow of ideas on topics without the preclusion the Camas staff has done. I won't be able to participate tonight.

Randal Friedman
Camas, WA

On Sep 30, 2025, at 10:57 AM, Jenna Kay <Jenna.Kay@clark.wa.gov> wrote:

Hi Randal,

Thank you for your note. County staff review and save all comments you submit for the comprehensive plan. They are also ultimately shared with the county Planning Commission and County Council as part of the project record, for their consideration. You can view comments received to date here: <https://clark.wa.gov/community-planning/2025-update-public-comment>

In regards to topics within the boundaries of the City of Camas, such as the mill site, the [Camas Community Development department](#) is the appropriate staff working on land use issues within the city. The county Community Planning Department does not have planning jurisdiction within the city. Related to climate policies, the city and county are each in the process of developing climate elements to address new state climate planning legislation; but each jurisdiction needs to adopt its own climate policies.

The County Council will consider and vote on what each city proposes regarding any urban growth boundary expansions. If you would like to share more comments or testify to the County Council, there are two key county public feedback opportunities taking place over the next few months.

- A draft environmental impact statement will be issued for a 60-day public comment period on the potential environmental impacts of the county and cities' proposed comprehensive plan growth alternatives.
- The county Planning Commission and County Council are scheduled to hold a joint hearing on selection of the preferred growth alternative (for the county and all of the cities within the county), tentatively scheduled to take place in early 2026. This is when the decision about whether or not any city expands its growth boundary will be voted on.

You can view the current project schedule here: <https://clark.wa.gov/community-planning/2025-update>

If you are not already receiving county comprehensive plan updates, you can receive notifications about these opportunities, by signing up here: <https://clark.wa.gov/community-planning/get-project-updates>

Hope that helps.

Regards,
Jenna



Jenna Kay she/her/hers
Planner III
COMMUNITY PLANNING

564.397.4968



From: Randal Friedman <randalfriedman@gmail.com>
Sent: Monday, September 29, 2025 5:18 PM
To: Jenna Kay <jenna.kay@clark.wa.gov>
Subject: Re: CLARK COUNTY CONSIDERATION OF THE CLIMATE CHANGE/HOUSING OPPORTUNITY FROM THE PROPER CLEANUP OF THE CAMAS MILL

Jenna — To confirm, I reached out to you 9 months ago, and several times since. This is what I have heard back.

I can accept a non-response if you decided this is a non-issue for the county but informing me would be courteous.

I spoke before the Council last May on this subject. I referenced the situation in Camas precisely as it is before you. I recall saying that a brownfield like the Camas Mill should come before sprawl into a greenfield. Imagine my surprise last week learning the county and Camas planning stuff have been working in the shadows to facilitate this very issue I wished to discussed.

Imagine my surprise when several councilors on the Camas City Council did not know of this. This being the opening of a vast door to future sprawl without discussion of full costs and alternatives.

I can only imagine what you've been told about me. None of it is true. I have impeccable credentials including master planning of the expansion of a university in Malibu.

Throughout my career I have successfully taken on projects for problems other thought insolvable, like doubling a religious university in Malibu that most said was DOA.

This very brownfield/greenfield question, and Camas' sad approach to planning, represents a number of statewide policy issues. I am not one to give up, I will take these issues to the state level. That's the level I worked mostly with for my Navy career. I have already started.

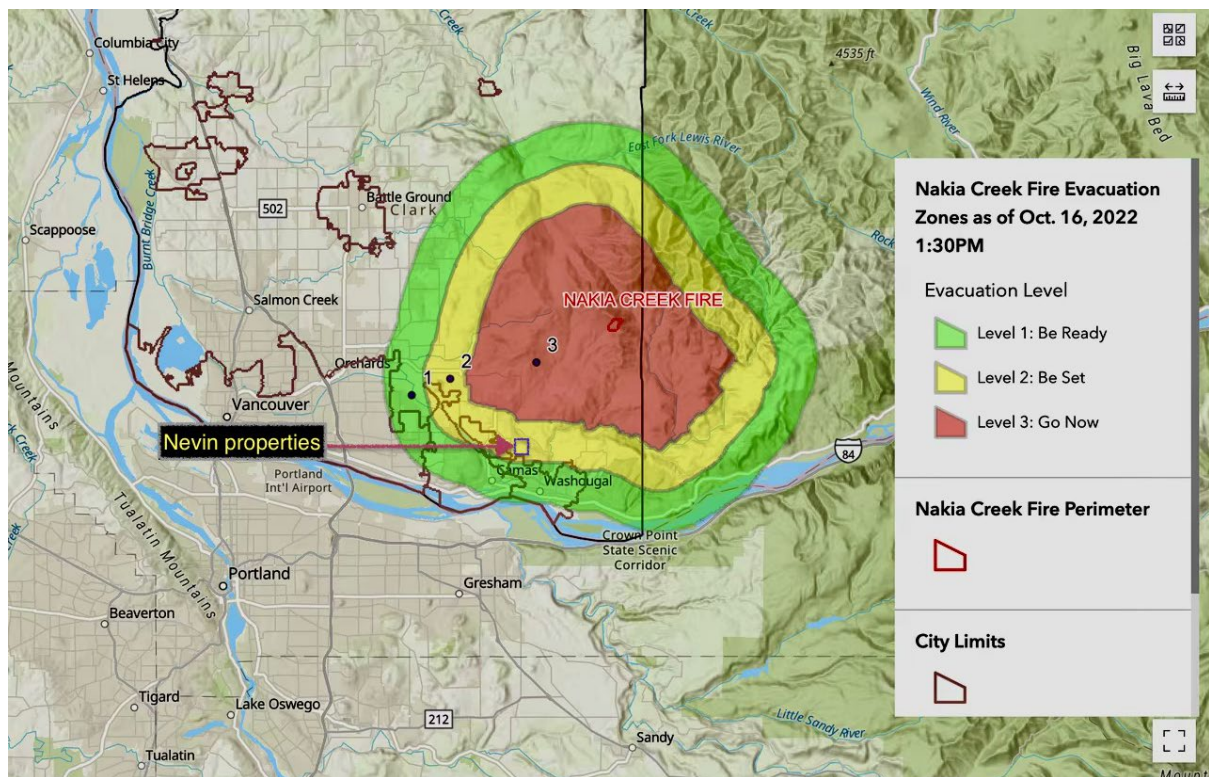
We are hosting a community conversation tomorrow on middle-housing. I will mention whether middle-housing belongs in a remote rural landscape subject to fire hazards with a long list of impacts. This simple graphic compares the mill and Nevin properties for the question of GMA compliance. How many in Camas, once informed, will support this middle-housing proposal and its accompanying fiscally costly sprawl?.

There is another option. The GMA demands it be considered.

A reminder of how Chair Marshall as quoted in The Columbian: "We have to accommodate growth, the population and employment, jobs, lands. We need to focus that growth in the cities," Council Chair Sue Marshall said. "Where it's needed to bump out this way or that way to accommodate that population growth and the jobs, and let's consider the cost of infrastructure as well." <https://www.columbian.com/news/2025/mar/11/as-20-year-growth-plan-update-continues-clark-county-council-to-skip-resource-lands-study-for-now/>

My point exactly: the county has the burden of accounting for the full costs of this sprawl and the availability of land within cities as an alternative.

Randal Friedman
Camas, WA



On Dec 30, 2024, at 2:23 PM, Jenna Kay <jenna.kay@clark.wa.gov> wrote:

Thank you Randal, confirming receipt of your comment.

Regards,
Jenna



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From: Randal Friedman <randalfriedman@gmail.com>

Sent: Monday, December 23, 2024 12:51 PM

To: Jenna Kay <jenna.kay@clark.wa.gov>; Amy Koski <Amy.Koski@clark.wa.gov>; Gary Albrecht <gary.albrecht@clark.wa.gov>

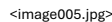
Cc: Rebecca Small <rebecca.small@cityofvancouver.us>; Mitch Kneipp <mitch.kneipp@cityofwashougal.us>; David Stuebe <David.Stuebe@cityofwashougal.us>; Don Steinke <crvancouverusa@gmail.com>;

Denise Hayes <denise@denishayes.com>; Shari Phiel <shari.phiel@columbian.com>; Alan Peters <APeters@cityofcamas.us>

Subject: CLARK COUNTY CONSIDERATION OF THE CLIMATE CHANGE/HOUSING OPPORTUNITY FROM THE PROPER CLEANUP OF THE CAMAS MILL

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.

Greetings — Last week's Columbian article by Shari Phiel did an excellent job describing the difficult road to meet Washington's GHG goals: 70% by 2040 (within the Comp Plan update) and 95% by 2050. This at a time when GHG emissions have been rising. As the article points out, the State's GHG emissions have increased by 19% since 1990. It is a "tall order".



I have submitted the attached paper to the Community Development Director and Mayor of Washougal. It begins by recognizing the difficulty the City of Washougal faces to meet Washington State's Comprehensive Planning climate change/resiliency and housing requirements. Demonstration of success might be more attainable with "non-operational" portions of the Camas Mill (already designated by the Department of Ecology (DOE)), remediated for unrestricted future use based on the concept of a Historic Regional Employment Center. The Society's plan is linked here: <https://online.flippingbook.com/view/952378320/>

Clark County has embarked on a most ambitious and challenging path to meet state requirements. The difficulty of this effort, and a potential solution, was chronicled in The Columbian.

The state goal requires emissions be reduced from 1990 levels, which is also referred to as the baseline. The goal increases to 70 percent below 1990 levels by 2040 and 95 percent below 1990 levels by 2050... "Given how the state's climate legislation was written, [Jenna] Kay said there is opportunity for the various jurisdictions to work together. "Not only do you have to reduce greenhouse gases, you cannot increase emissions somewhere else in the state. You're also not allowed to do something that pollutes more in your neighboring town or something like that," she said.

In this light, Clark County should consider seeking standing before the Department of Ecology's (DOE) evaluation of the Mill's future. This standing recognizes a compelling public purpose for remediation of a Historical Regional Employment Center. Moreover, Clark County should seek this area being available for regional climate change and housing affordability needs. This regional context should represent the "expectation" the Model Toxic Control Act (MTCA) tasks DOE considers in evaluating whether land remains industrial. Instead, DOE's expectation could be that non-operational portions of the Camas Mill be considered as a "Historic Regional Employment Center" and remediated for unrestricted use. Looked at another way, Camas' inaction can be viewed as increasing emissions amongst its neighbors. This increase reflects lost opportunities for VMT reduction, for example. Given meaningless jurisdictional boundaries for GHG pollutants, Camas is holding back what could be significant reductions outlined in the paper. Of course these will remain unknown unless considered in the planning process.

Consider only the 27 acre "lab site." Several years ago I made the attached graphic to show how only the upper-half of the lab site could hold the Adidas North American HQ. Since then, two more buildings were added on those back pads for buildout. The site accommodates 2,500 jobs, a large indoor athletic center, and even a soccer field. You can read about it here: https://leverarchitecture.com/projects/adidas_headquarters_expansion_and_gold_building

The lab site has similar topography and could accommodate parking with housing over commercial. The site could be cleaned well within the time frame of the plan. With the pulp line shut down across NW 6th Ave, what used to be a noisy canyon is quiet. Longer term it might be developed with the building mass already there. Adaptive reuse of those buildings might create some great opportunities. I'm told there are some beautiful locations. This needs to be our County's future, not giving up this opportunity for some true New Urbanism by insufficient cleanup.

In the continuing work on the mill cleanup Camas refuses to consider anything but the status quo. In fact, Camas won't consider future use as it would "offend" the mill. Yes... Koch Industries largely non-operational mill can sit idle and padlocked and that is its current course under the MTCA. Ecology is suggesting that the MTCA doesn't allow them to consider climate change/housing needs voiced by anyone but the City. They are bound to an industrial cleanup. No public access. No housing. No shoreline access or jobs beyond the 150 remaining on the towel line (that the Mill District plan protects). This from what was the largest specialty paper mill in the world employing more than 2,500 family wage jobs.

Hogwash. The MTCA and Growth Management Act should be synchronized. In 1990, DOE noted:

"When Washington voters passed the Model Toxics Control Act as Initiative 97 in 1988, they provided Ecology with not a pre-packaged solution for hazardous waste cleanup, but rather the basic framework for a toxics cleanup program. The back-bone of the Model Toxics Control Act — how hazardous substances will actually be cleaned up and how well it will work — would depend largely on how the law was implemented."

With the difficulty ahead, our state should encourage regional aspirations for solutions. While the City of Camas, of course, decides ultimately the future land use they alone shouldn't dictate the cleanup level. With the potential for thousands of jobs and housing units, compact and next to downtown, this can make feasible public transit alternatives. This building can meet the high standards for buildings, incorporate solar, EV charging, and so many other things. These issues were hardly a consideration in 1988 when voters created the MTCA, and the relationship between planned development and GHG reduction wasn't a consideration.

All this happens with a repurposed mill. The mill's cleanup can be considered part of the ongoing implementation of the MTCA. This is necessary for the drastic changes required in planning the next 20 years and beyond.

I am a Camas and Clark County citizen. I have delivered Meals on Wheels to parts of a Washougal many don't see and serve meals at Refuel Washougal. I've helped box food at the Clark County Food Bank. These clients, and far too many others in forgotten parts of Clark County belong in your planning process. The Mill District Plan can help them. Please consider populations more and more challenged by affordability and mobility issues, and how they could benefit.

Just one example is VMT. As noted in the Mill District plan, the Mill District could link with Washougal and even the 192nd corridor via a free electric shuttle as Estes Park, CO has shown for decades. You need density to accomplish that. A padlocked and rusting mill covering hundreds of buildable acres could be the key to tying three cities together with carbon free transportation. Between the efficiencies of dense downtown development, this could tackle the current 64% of GHG coming just from transportation and heating.

Thank you and please consider this a formal comment to the plan update and provide to the Advisory Committee.

Randal Friedman

Camas

<image006.jpg>