

From: [Jeffrey Delapena](#)
To: [Don Steinke](#); [Cnty 2025 Comp Plan](#)
Cc: [Oliver Orjiako](#); [Jose Alvarez](#); [Jenna Kay](#)
Subject: RE: Draft EIS Comp Plan comments
Date: Monday, October 20, 2025 3:27:04 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Don & Alona,

Thank you for your feedback related to the Draft Environmental Impact Statement for the 2025 Comprehensive Plan Update.

I have forwarded your comments to Staff and will enter these into the Index of Record.



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From: Don Steinke <crvancouverusa@gmail.com>
Sent: Monday, October 20, 2025 3:15 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Subject: Draft EIS Comp Plan comments

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From Don Steinke and Alona Steinke – Climate Action of Southwest Washington

To: The Draft EIS Team for the Clark County Comp Plan

Dear Oliver Orjiako, Jenna Kay, et al

Here are our public comments and suggestions related to your Draft EIS for your Comp plan SEPA requirements.

On p 8, the DEIS says: All alternatives have the potential to affect the air quality and climate. Impacts can be related to the balance between emissions from automobile use (vehicle miles traveled or VMT), emissions from unregulated private sources (e.g. gas lawnmowers), federal regulations through the Clean Air Act, and conversion of rural and resource land to urban land with less vegetative cover. For differences in VMT (full build-out capacity, not planned growth) see Transportation Impacts. For conversion of rural to urban land see section 3.2 – Earth.

Steinke Suggested revision: All alternatives have the potential to degrade the climate and our health, and to increase smog. Adverse impacts are proportional to the amount of gasoline and natural gas burned in motors, heating systems, power plants and industrial processes and to the loss of the carbon capture function of trees. The amount of gasoline burned is increased by the number of miles traveled, and is decreased by vehicle electrification and reduced miles traveled. The amount of methane gas burned is decreased by converting existing gas heating systems to electric heat pumps systems, and by replacing the Clark PUD Gas plant with the widespread installation of solar panels and batteries.

Re SEPA section on **ENERGY AND NATURAL RESOURCES**

[Steinke suggests that Alternative 1 should allow upzoning.]

P 11 DEIS says: Protection of air quality occurs through federal and state regulations on automobiles, fireplaces, and wood stoves.

Steinke suggested revision: [Protection of air quality occurs through federal and state regulations on automobiles, heavy-duty vehicles, fireplaces, wood stoves and hundreds of polluting facilities such as: hospital furnaces, paper mills, metal recycling, semiconductor manufacturing, gas stations, and compressor stations on gas pipelines. The Southwest Clean Air Agency under the authority of federal and state law is the enforcing agency for stationary sources but not for mobile or pipeline sources of air pollution. All tailpipe pollution is considered legal unless the pollution controls are modified. Violators are caught primarily through investigations initiated by tips from the public and former employees.]

On page 11 under Summary

DEIS says: Climate change is mitigated through Federal and State air quality standards. Converting the least amount of undeveloped vegetated areas to impervious surfaces and reducing vehicle emissions through more efficient development are available forms of mitigation to avoid impacts to climate.

[Steinke's suggestions: However, Under President Trump, most federal policies to mitigate climate change have been rescinded or weakened: Fuel efficiency standards were weakened, EV adoption targets were eliminated, Washington's authority to require manufacturers to sell more electric cars and trucks was rescinded, oil-field methane regulations were weakened, carbon capture requirements for power plants -- canceled.

However, Washington State: requires our fossil fuel electric power plants to be gradually phased out by 2045, requires that the energy efficiency of existing and new large commercial buildings be improved, requires fuel suppliers to gradually reduce the carbon intensity of their fuels, requires major emitters to reduce emissions, (via a cap and invest program which was upheld by the U.S. Supreme Court Oct 9, 2025) to net zero by 2050, requires that emissions statewide be reduced 45% by 2030, and to net zero by 2050. Our Cap and Invest Program is raising almost \$1 billion per year to invest in emissions reducing projects. (Hockinson, Washougal, and Battle Ground School Districts, the Port of Ridgefield, and the City of Vancouver have been recipients of those funds]

Also, on page 11 under Summary of Mitigation/ Energy and Natural Resources

DEIS says: The primary energy conservation measure available to local jurisdictions is to adopt a compact urban form that supports alternative, energy efficient transportation.

- [Steinke adds, It is worth noting that the County is not the only jurisdiction implementing energy conservation measures:
- The Washington State Department of Commerce has been directed by the legislature to enforce compliance with the Clean Buildings ACT for existing commercial buildings larger than 20,000 square feet and for multifamily developments >20,000 sq feet. The Clean Buildings Act requires those buildings to meet Energy Use Intensity Standards. These buildings must benchmark energy use, create energy-management plans and operations-and-maintenance programs, and meet Energy Use Intensity (EUI) targets (or take other compliance steps) by specified deadlines.
[Seattle+2Trane+2](#). The compliance timeline for the various building sizes and classes varies between 2026 and 2028.
- Commerce has legal authority to **assess fines** for noncompliance--up to **\$5,000 per building plus \$1 per square foot per year** for continued violations. Penalties continue until compliance is achieved or a waiver is granted. (See RCW 19.27A.210 and WAC 194-50-150.)
- **The actual performance standard**
Each covered building must meet a **Target Energy Use Intensity (EUI target)** calculated from:
Building activity type (office, hospital, warehouse, etc.)
Location and climate zone
Adjustments for operations, occupancy hours, and special uses
The **Department of Commerce** publishes tables of EUI targets in **WAC 194-50-080** (referencing ASHRAE Standard 100-2018).

Example Energy Use Intensity Targets (approximate):

Building Type	EUI Target (kBtu/ft²·yr)*
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Office	~48–58
Retail	~63
School	~67
Hospital	~163
Warehouse	~32

- *Varies by climate zone and other adjustments. To comply, a building's **weather-normalized actual EUI** (from benchmarking data) must be $\leq$ **its EUI target.**]

<http://lawfilesexternal.wa.gov/biennium/2019-20/Pdf/Bills/Session%20Laws/House/1257-S3.SL.pdf#page=1>

Electric heat pumps are more energy efficient than gas furnaces or water heaters. *If* the Washington State Supreme Court upholds a lower court ruling that Initiative 2066 is unconstitutional, then Clark County could take action to discourage the use of fossil gas.

It is worth noting that although The Climate Commitment Act does not ban natural gas, it creates a set of conditions that discourage it:

- **Higher cost of upstream gas utility operations:** As natural gas utilities face greater obligations under the CCA their costs will continually increase. Some of those costs may be passed on to customers, making gas-fired heating systems and stoves less economically attractive.
- **Electric alternatives get supported:** Programs funded by the CCA make electric heat pumps, electric water heaters, insulation upgrades and building shell improvements more financially viable; as a result, gas becomes comparatively less appealing.

[Clark PUD has increased incentives for converting from electric resistance heating system to](#) all-electric heat pumps.

Other County opportunities to promote energy efficiency and conservation include:

- Streamlining the permitting process for EV charging infrastructure and for residential solar.
- Ending County purchases of ICE vehicles if all-electric options are available. EVs are rated at about 120 MPGe.
- Evaluating the energy efficiency of the C-Tran buses. It seems to me that small buses that run more often would increase ridership and thus increase net energy efficiency and conservation.
- Replacing inefficient gas heating systems with heat pumps in County-owned or operated buildings.

[Also, on page 11 Under Environmental Health, Steinke suggests the SEPA checklist includes Toxic chemicals. [According to the EPA](#), in Clark County we

have 20 sites that use toxic chemicals. In 2024, they released 116,000 pounds of toxic chemicals to the air and 96,000 pounds were disposed of off-site such as at our hazardous waste facility. Who pays attention to those operations?]

On p 49, the DEIS says: Area Sources: Area sources include air pollution from smaller, dispersed activities ^ [Steinke inserts: such as unregulated gas water heaters and furnaces in residences and small commercial buildings, restaurants and brew pubs, and propane heaters on rural properties.] ^ such as residential wood burning, outdoor burning, use of solvents, and gasoline-powered equipment. While each individual source may be small, the collective emissions from these sources are significant. In Clark County, area sources contribute around 20 percent of the total VOCs and NOx and are responsible for most of the PM2.5 air pollution. The largest contributor to PM2.5 air pollution is residential wood burning. [In addition, area sources include the burning of woody debris, illicit trash burning, e.g. burning of plastic, and burning of pFAS-coated grease-resistant food wrapping materials.]

On p 50,

Steinke says: In Section 3.3.2 Significant Environmental Impacts, the DEIS downplays the climate impacts of burning fossil fuels.

The DEIS is not covering the most important impacts. It would be more honest if the first sentence of Section B on Climate was replaced with this:

According to Chat GPT:

Climate change is already happening and hurting our economy and it's man-made, warming instead of cooling the way that we would expect from Earth's Natural Climate Cycles. Although our planet has natural long-term climate-cycles, they are driven by **Milankovitch cycles** — the slow, predictable variations in Earth's orbit and tilt that influence how sunlight is distributed across the planet. These cycles control the timing of ice ages and warm periods over tens to hundreds of thousands of years.

If only natural cycles were operating, **Earth would be slowly cooling** right now.

- Without human activity, we'd expect a **very slow decline in global temperatures,**
- **But significant global warming is already happening with increasing speed.**
- Global average temperature has **risen about (2.2 °F)** since the late 1800s.
- The past **decade was the warmest in at least 125,000 years.**
- The **current warming rate** is **~100 times faster** than natural cycles alone can cause.
- This warming corresponds precisely to the period of rapid greenhouse gas emissions (especially CO₂, CH₄, and N₂O) from human activities — burning fossil fuels, deforestation, and agriculture.

And according to the *Climate Impacts Group at the University of Washington*,

In the PNW:

1. **Our** Frost-free seasons are longer — fortress.wa.gov
2. Winters and overnight (minimum) temperatures have

increased noticeably. fortress.wa.gov+1

3. Snowpack in the Cascades and Olympics is substantially lower than historical norms. [EarthLab](https://earthlab.org)+2fortress.wa.gov+2

4. **We have more extreme precipitation**

5. Peak flows in rivers are occurring earlier in the spring than in the past. dnr.wa.gov+1

6. The Pacific Northwest average annual temperature has gone **up more than ~2 °F** since about 1895.

fortress.wa.gov

7. And in the decades of the 2040s, for SW Washington, the UW CIG predicts that our summer peaks will be 5.9 degrees warmer and there'll be less water in the Columbia for hydro during summer and fall.

And Steinke suggests that the second Paragraph in section B be replaced with this:

Although climate change is a global problem, Cities, Counties and States are leading the efforts to decarbonize. Locally, Multnomah County, Oregon Metro, Eugene, Portland and Vancouver are leading.

Every city, county, or state that takes decisive steps toward reducing emissions demonstrates that progress is both possible and practical. These local successes create **models that other communities can replicate**, reducing political and technical uncertainty elsewhere.

When those programs show measurable benefits—cleaner air, reduced cost of living, and a growing economy—they provide **proof of concept** that inspires imitation.

That is why our legislature passed the Climate Element and requires us to develop a plan to reduce emissions and develop a resilience plan

Moreover, local policies build **momentum from the bottom up**.

As more communities adopt climate-friendly actions, they form regional networks, create markets for clean technologies, and increase public pressure for state and federal governments to act. In this way, **local leadership becomes a catalyst for global progress**—demonstrating that climate solutions are not confined to international agreements but can begin with the choices made in individual towns and counties.

We need to do our part in Clark County.

On page 50, the DEIS says: "Automobiles trips are anticipated to increase in all alternatives." [That may be a violation of the Climate element, which says we must reduce vehicle miles traveled per-capita. We need a plan to reduce per-capita vehicle miles traveled per capita. In addition, The Climate element requires us to reduce overall emissions, which may not be possible if we allow increased trips. We should aspire to reduce trips and to promote EVs.

Also, on p50, the DEIS says: "Major reductions in these emissions have been achieved through stringent federal controls on automobiles, planes, and major

industries. The passage of the Clean Air Act Amendments in 1990 also requires air quality controls on new development.” [Steinke says: **However**, Trump has reversed some of those policies: he has rescinded the requirement that light duty vehicles increase their average efficiency, and he has rescinded the authority that WA has to require manufacturers to gradually increase the number of EVs sales and Trump has given permission for the trucking and Ag industry to disable the DEF pollution controls for diesel trucks and farm machinery. SWCAA tells me, that decision will significantly degrade air quality.] <https://www.agweb.com/news/machinery/farmers-truckers-and-gear-heads-rejoice-epa-rolls-out-streamlined-diesel-engine-fl>

Also, on p 50 under climate: [Steinke suggests including the Best Available Science: According to the University of Washington Climate Impacts group, during the decade of the 2040s, summer peak temperatures in Woodland WA are expected to be 5.9 degrees F higher, with less overall rainfall, stronger rain events and longer droughts. Source, The Guidance document from Commerce.]

At the bottom of page 50, the DEIS says, “None of the alternatives would have a direct impact on the climate of the region in the short-term.” [Steinke suggest you follow with: However, the law requires us to innovate, to do our part, and lead. As a result, we’ll grow our economy, reduce the cost of energy, and clean our air.]

On p 51 : [Steinke says: This statement is not supported: “Alternative 1 may have the highest impact on air quality due to traffic-related impacts. With respect to transportation, Alternative 1 has a higher number of total person trips and a higher number of Columbia River bridge crossings than Alternatives 2 and 3. Vehicle-miles traveled (VMT) and vehicle-hours traveled (VHT) are the highest in Alternative 1, suggesting that the Clark County transportation network will serve more vehicles taking longer trips and experiencing greater congestion which could lead to higher greenhouse gas emissions which could reduce air quality.” End quote.

People need affordable housing within walking distance to their job and to amenities. For EXAMPLE: I asked the young medical assistant at a clinic in Camas if she was new to Clark County. She said,” Yes and NO. I just moved here from California, but live in Woodland because housing was more affordable there.”]

P 54 [Regarding trash burning, the process of enforcement is complaint driven and is not adequate. If for example, I cannot identify which neighbor is burning plastic in his shop heater, SWCAA is not likely to respond. I recommend that SWCAA consider using a drone with pollution detectors.

On p90, DEIS says: The demand for electricity, natural gas, and other natural resources will increase in Clark County as growth occurs. [Steinke comment: **Increased demand for natural gas is not likely**. First: The Climate Commitment Act is designed to cap allowed emissions each year and to gradually reduce the cap. Second: The Climate Commitment Act also raises the cost of natural gas and uses that money to subsidize clean energy projects. Third, I-2066 passed. It forbade Cities and Counties from discouraging the use of gas. However, In **March 2025**, King County Superior Court Judge Sandra Widlan ruled that Initiative 2066 was unconstitutional. The State Supreme Court is expected to hear the case within the next 6 months before April of

2026.]

Also, on p90 the DEIS says: "The state requires energy efficient construction of buildings (Washington State Energy Code, WAC 51-11C and 51-11R, as amended). Construction of energy efficient buildings is, as a result, provided for in local building codes." [In addition, Steinke suggests, The Clean Building Act requires existing commercial buildings >20,000 to meet new Energy Use Intensity Targets. The DEIS is not accurate unless it states that we will not be able to meet our emissions reduction requirements unless we have a plan to do more, faster. In particular, make existing buildings <20,000 square feet more efficient.

1: We need to retrofit existing homes and buildings < 20,000 square feet more quickly for energy efficiency, conservation, emissions reduction, solar energy and EVs.

2: What about adopting a local reach code that requires new construction to be net zero energy, net zero emissions, all electric ready, solar ready and EV ready? The PAE Building in Portland is net zero energy, and the Freedom-Hayes school in Camas is net-zero ready.

3: What about developing a program to use funds from the Climate Commitment Act to replace existing gas and electric resistance heating systems with heat pump systems, one neighborhood at a time. Don't wait until existing gas heating systems age out. Provide a customer acquisition service (sales force) for contractors one neighborhood at a time, thus creating economies of scale. We need to convert at least 5000 systems per year, particularly in mobile home parks.

Also, on p90, the DEIS says: Solar energy ordinances are often implemented to ensure that residences are oriented on lots in a way that maximizes the collection of passive and active solar energy. [Steinke asked Chat GPT is that was accurate? It said: **NO: Clark County (WA) does not appear to have a county ordinance that requires residential lots or home orientation to be sited specifically to maximize passive/active solar collection.** However, Clark County code permits and encourages solar and allows accessory renewable systems. End Chat:

Consider developing a plan to partner with the PUD to perform the customer acquisition task for residential solar. Approximately half the cost of residential solar is for soft costs, such as customer acquisition and permitting]

Re DEIS p213, Instead of LEED certification, specify LEED Platinum. Better yet, aim for net zero energy and net zero emissions.