

From: [Rebecca Messinger](#)
To: [Cnty 2025 Comp Plan](#)
Subject: FW: Comp Plan DEIS Alternative-1 recommended for Enhanced Water Resource Protections
Date: Sunday, November 23, 2025 3:33:12 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Please see the public comments below. Thank you!



Rebecca Messinger
Clerk to the Council
COUNTY MANAGER'S OFFICE

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From: jnanney56@gmail.com <jnanney56@gmail.com>
Sent: Saturday, November 22, 2025 9:39 AM
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Cc: Kathleen Otto <Kathleen.Otto@clark.wa.gov>; Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>
Subject: Comp Plan DEIS Alternative-1 recommended for Enhanced Water Resource Protections

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Letter to the Clark County Council
November 20, 2025
Clark County Council
P.O. Box 5000
Vancouver, WA 98666

Honorable Council Members,

I am writing to submit my independent comments regarding the Water Component within the Draft Clark County Comprehensive Plan DEIS Alternatives, with the specific intent of reinforcing and supporting two critical submissions: the Friends of Clark County document summarizing the 2025 Agricultural Lands Study – which determined that all currently designated agricultural lands and specific additional rural areas meet Washington State legal criteria for long-term commercial significance – and the additional analysis regarding compliance, enforcement, and long-term environmental sustainability submitted by retired USDA/USFS Regional Hydrologist Richard Dyrland.

Inadequacies of Mitigation and Regulatory Compliance

Collaborative research indicates that relying heavily on mitigation strategies, particularly for complex systems like stormwater management, presents inherent risks. The technical literature clearly demonstrates that mitigation has real limitations, and its effectiveness has historically been low in certain regional contexts, including in the Puget Sound area and within Clark County itself.

It is essential that the County recognize that if the associated social, economic, or physical opportunity costs and negative impacts cannot be effectively offset, the proposed policies or actions may compromise full compliance with the Growth Management Act (GMA) and other environmental regulations.

Priorities for Water Resource Management

The available data underscores the critical need for significantly improved protection, compliance, and enforcement mechanisms across the County for *both surface and groundwater systems*. Specific areas requiring immediate action include:

- Enforcement of Water Withdrawals: Addressing ongoing, unmonitored pollution in upper watersheds and controlling un-licensed, in-stream water withdrawals during critical low-flow summer periods.
- Wetland Protection: Greatly reducing or prohibiting the continued direct or indirect loss of wetlands, which are vital for sustaining stream and groundwater flow and recharge.
- Groundwater Safeguards: Implementing the State of Washington's recommendations for greater use of the Critical Aquifer Recharge Area (CARA) **Protection System to secure vulnerable groundwater sources.**

Development Policy and Environmental Risk

Future growth projections must be met through strategies that avoid high-risk environmental impacts. For instance, evaluating the proposal to introduce new gravel and rock mining sites, such as the proposed Chelatchie Bluff Mine, raises serious concerns. Technical reviews of this location indicate a high risk of degrading both surface and groundwater recharge areas. This activity could severely impact numerous *shallow downstream domestic wells* and threaten the recovering populations of Endangered and Threatened Listed salmonids in the Cedar

Creek Watershed.

Economically viable alternatives, such as sourcing high-quality gravel and rock that can be barged down the Columbia River from the geologically superior Missoula Flood Terraces, represent a proven solution with low environmental impact at the source.

Recommendation on DEIS Alternatives

Ultimately, the successful implementation of any new plan – regardless of the adoption of "Advanced Technologies" – *depends entirely on a fundamental commitment to Compliance and Enforcement from County Leadership and Staff*. Without this commitment, the County risks serious, costly, and un-mitigatable long-term water resource degradation.

Data soundly demonstrates that **Comp Plan DEIS Alternative-1 provides the most responsible path forward**. This alternative is best positioned to meet projected future growth needs while simultaneously ensuring the lowest achievable level of social, economic, and environmental tradeoffs and opportunity costs.

I urge the County Council to **adopt Alternative-1** and dedicate the necessary resources to compliance and enforcement to safeguard Clark County's essential water resources for the future.

Respectfully Submitted,

John E. Nanney PMP
Chelatchie Resident
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