

From: [Jeffrey Delapena](#)
To: [Ann Foster](#); [Cnty 2025 Comp Plan](#)
Cc: [Oliver Orjiako](#); [Jose Alvarez](#); [Jenna Kay](#)
Subject: RE: Comments on the DEIS
Date: Wednesday, November 26, 2025 11:28:15 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Ann,

Thank you for submitting FOCC's feedback related to the Draft Environmental Impact Statement for the 2025 Comprehensive Plan Update.

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



Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558



NOTICE OF PUBLIC DISCLOSURE: This e-mail account is public domain. Any correspondence from or to this e-mail account may be a public record. Accordingly, this email, in whole or in part may be subject to disclosure pursuant to RCW 42.56, regardless of any claim of confidentiality or privilege asserted by an external party.

From: Ann Foster <annfoster5093@gmail.com>
Sent: Wednesday, November 26, 2025 11:15 AM
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>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Matt Little <Matt.Little@clark.wa.gov>; Kathleen Otto <Kathleen.Otto@clark.wa.gov>
Subject: Comments on the DEIS

You don't often get email from annfoster5093@gmail.com. [Learn why this is important](#)

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.

On behalf of Friends of Clark County (FOCC) , I am pleased to have the opportunity to submit our comments on the draft of the SEPA environmental impact statement as presented by Community Planning to Clark County on October 1, 2025. Although there may be more instances in which more comment could be appropriate, we selected 4 of the Comp Plan Elements that we feel made the most significant impact on the overall environment and health of Clark County, and fit with FOCC's values and mission. In all comments below, Friends of Clark County advocates for Alternative 1 of the existing alternatives, which is the No-Change Alternative. Although our organization is not averse to change, Alternatives 2 and 3 consist of plans that adversely impact Clark County, largely because of the proposals by some cities to annex high-quality agricultural lands.

FOCC's comments are below:

ELEMENT: WATER

Compiled by Richard Dyrland. Retired USA/USFS Regional Hydrologist, Al O'Connor, Retired Army Corps of Engineers Geologist

In regards to the DEIS section on "WATER," there is a considerable amount of data and information that shows the State of Washington and particularly Clark County, have a need to follow through on better protection, compliance and enforcement of both surface runoff and groundwater management, including ongoing un-licensed in-stream summer water withdrawals, un-monitored pollution in the upper parts of watersheds, and resulting higher stream temperatures during reduced streamflow. In addition,, Washington State has recommended more use of the Critical Aquifer Recharge Areas (CARA) Protection System to protect groundwater recharge areas.

Building on this concern, the continuing direct and/or indirect loss of wetlands that support stream and groundwater flow and recharge, needs to be greatly reduced or no longer allowed.

Despite all the new "Advanced Technologies" available and applied to "New Plans" completed or old ones updated, --- without County Leadership and Staff commitment to Compliance and Enforcement of these new Policies and Clark County Departments Operational Programs, the result will be more ineffective changes and implementation commitments that would not prevent serious and costly long-term unmitigatable water resources impacts.

A clear example of these risks can be seen in the potential of adding more gravel and rock mining sites at locations such as the proposed Chelatchie Bluff Mine where data shows a high risk of impacting surface and groundwater recharge, including degradation of numerous downstream domestic wells and the Threatened and Endangered Listed recovering salmonid populations below the mining site which affects all of the Cedar Creek Watershed.

Furthermore, documents submitted to Clark County by retired Army Corp of Engineers Geologist Al O'Connor show that gravel and rock barged down the Columbia River (a source now used By Portland) is of high quality, is economically feasible, and has a low environmental impact at the source sites in the old Missoula Flood Terraces on the Columbia River.

Turning to the topic of, "Mitigation" included early on in the document is greatly appreciated. It was clearly explained that Mitigation has real limitations, and not all direct or associated on or off-site negative impacts and effects of a policy or type of action can be mitigated effectively. Moreover, if the social/economic, or physical tradeoffs and opportunity costs that can't be effectively mitigated, then the proposed Plan or Action may not be acceptable, --- particularly in the case of achieving full compliance with GMA and environmental rules and regulations. For instance, it is reported that Stormwater Mitigation has failed 90% of the time in Puget Sound. It has failed in some areas of Clark County also.

CONCLUSION

Considering all these factors, of the three Comp Plan DEIS Alternatives, my conclusion is that Comp Plan DEIS Alternative-1 best meets projected future growth needs, that can be implemented with the lowest achievement level of Social, Economic, and Environmental tradeoffs, impacts, and opportunity costs and still meet the Goals and Objectives of Alternative-1.

ELEMENT: LAND USE AND SHORELINE

Housing

Compiled by Jim Byrne, Retired Fish And Wildlife Biologist, And Teresa Hardy, Sierra Club

Alternative 1

Conversion of prime agricultural land to urban uses under all alternatives except Alternative 1 is unwarranted. Alternative 1 would preserve the rural character of the county, enhance the sustainability of small-scale resource uses, and enrich our other values- recreational, scenic, historic, and environmental—that are associated with these lands. It would also be the best option to ensure Clark County's population is protected from worsening climate conditions.

Alternative 2

Under Alternative 2, the urban growth areas would be expanded by about 1,037 acres. This means that the expected 191,000 new residents would be accommodated by the expanded UGAs. Development would occur on land currently known to contain prime or good agricultural soils (787 acres) and forest soils (882 acres). The DEIS fails to adequately detail the damage that would be done to the County's prime, or good, agricultural lands by allowing this unnecessary development

Alternative 2 exceeds the land capacity needed to accommodate the housing and job growth projected for the next 20 years.

Alternative 2 would include upzoning to increase residential densities and accommodate

housing at all income levels as well as UGA expansions that would primarily accommodate employment growth with some additional low and medium density residential.

Ridgefield: Under Alternative 2, Ridgefield would add approximately 440 acres for industrial and mixed use purposes. Ridgefield would have to nearly double the capacity to meet their housing allocations target.

Similarly, **La Center:** would have an excess of 178 housing units.

Alternative 3

Under Alternative 3, the urban growth areas would be expanded by about 2,545 acres and additional site specific requests for rezoning would be considered. This means that the expected 191,000 new residents would be accommodated by the expanded UGAs and not within the existing boundaries. As shown by the VBLM, the majority of the future growth can be accommodated without any justification, Alternative 3 allows for excessive expansion that exceeds the land capacity needed to accommodate the housing and job growth projected for the next 20 years beyond that in Alternative 2. **Ridgefield** would have an excess of 6,933 housing units, and **La Center** would have enough capacity under Alternative 3 to meet its housing target, with a projected surplus of more than 500 housing units. In addition, the DEIS fails to adequately address the inevitable increase in noise pollution.

Under Alternative 3, the UGA expansions would convert rural and agricultural areas to residential, mixed use, commercial, and industrial uses. Conversion of prime agricultural land to urban uses under all alternatives except Alternative 1 creates unavoidable impacts. In areas susceptible to landslides, activities such as septic system construction, the watering of lawns, and the redirection of stormwater runoff as a result of development could lead to the saturation of otherwise stable soils and may cause the loss of internal slope stability. The DEIS fails to detail those impacts on the overall ecosystem of the County.

Ridgefield would have an excess of 6,933 housing units.

La Center would have enough capacity under Alternative 3 to meet its housing target, with a projected surplus of more than 500 housing units.

CONCLUSION

We recommend Alternative 1, as it is supported by the data showing that housing needs can be well accommodated within all existing urban growth areas while protecting and enhancing the environment to the benefit of human health and well being into the future. It is the most protective of rural and agricultural lands, yet accommodates new growth. Therefore, any alternative other than Alternative 1 is unnecessary and detrimental to the environment.

Alternative 2 and Alternative 3 would result in an unnecessary net loss of rural lands and agricultural lands of long term commercial significance and the DEIS fails to adequately detail the potential significant adverse environmental impacts that would result from the conversion of those rural and agricultural lands, much less the adverse impacts on the ability of the County to achieve its climate goals as required by the recent amendments to the Growth Management Act.

To be consistent with the Growth Management Act, WAC, and the Clark County Comprehensive Growth Management Plan, conversion of rural and agricultural lands land

under Alternative 2 or 3 would need to be consistent with Clark County Comprehensive Growth Management Plan Policy 3.1.3, which states that "...Rural Area is considered to be permanent and shall not be re-designated to an Urban Growth Area until reviewed pursuant to the Growth Management Act".

In addition, new state requirements to provide for housing at different income levels, will require all jurisdictions to do some upzoning to provide for housing at or below 80% of Area Median Income (AMI).

New growth needs to meet current and future septic, sewer and stormwater criteria.

The relationship of household income to housing prices is the main factor affecting the ability of Clark County's residents to secure adequate housing. Clark County residents who fall below the federal poverty level have a more difficult time securing adequate housing than those with higher incomes. The number of moderately and severely cost-burdened households in Clark County, in combination with high rental rates and increasing home prices, indicates a need for a more affordable and diverse housing stock, particularly for those at the lower ends of the income scale.

The percentage of single-family homes in Clark County has remained fairly consistent since 2010 at approximately two-thirds of housing stock, with over 134,700 units in 2023. Multi-family homes—2 units or greater—made up nearly 23 percent of total housing stock in 2023, with approximately 46,000 units. Developers have focused on single family homes rather than multifamily units. Between 2020 and 2024 the median home price in Clark County went up over 40 percent, from \$403,700 to \$568,600 (WCRER 2025a), outpacing the rise in median income over that same period.

The number of moderately and severely cost-burdened households in Clark County, in combination with high rental rates and increasing home prices, indicates a need for a more affordable and diverse housing stock, particularly for those at the lower ends of the income scale.

Land use patterns, including loss of both rural and resource lands, water degradation due to urban and suburban development and decreased water flow, loss of tree canopy, increase in impervious surfaces also exacerbate the hazards posed by **climate change**, as well as lead to greater emissions of greenhouse gases that contribute to serious climate change events. Low-density and non-contiguous development can result in a greater number of vehicle miles travelled, and result in the removal of trees and vegetation that can help mitigate extreme temperatures.

It should be noted that all alternatives rely on County enforcement. Lack of enforcement of existing County codes has been a continual issue. Code enforcement needs to be expanded and become more efficient.

Economy

**Compiled by Ann Foster, Salmon Creek Farmers Market since 2010,
Second Mile Food Hub, Clark County Food Systems Council**

Tucked away in a small corner of the DEIS (in the sections on Land Use and Shoreline) is the discussion on Economy. It provides a current description of the economy, (ie., jobs) and

the environmental impacts of alternatives 1, 2, and 3. FOCC takes this opportunity to comment on our position that none of this discussion mentions the potential for economic growth in the agricultural sector, especially in light of the recent Clark County Agricultural Lands Study findings, which confidently confirms the fact that Clark County's "asset" is its many acres of prime soils for growing a variety of specialty and profitable crops.

Alternative 1 would preserve the most number of acres available for high-quality farming, given the quality of the soil. If provided support from the county and private sector, agriculture could be the foundation for a successful economic sector that would not only grow food for a growing population amid a changing climate in which imported food becomes less reliable, but would also support a myriad of sub-industries. A vibrant agricultural industry brings business opportunities such as farm equipment repair, cold storage, farm-to-table culinary start-ups, tourism, and engineering and supply chain expertise devoted to transportation and food processing.

We are disappointed that CREDC ignores that agriculture is a powerful economic force. Even the USDA recognizes that agriculture in America brings in over 350 billion to the annual US economy *just* in exports (<https://www.ers.usda.gov/data-products/charts-of-note/chart-detail?chartId=112949>)

Instead CREDC seems to focus on brick and mortar facilities that might house manufacturing, assuming that one viable industry (manufacturing) rather than another viable industry (agriculture) will be the driving force to create a sustainable number of jobs. Its 2024 plan focuses on "critical success factors for continued economic growth in the county, focusing on the region's three-pillar framework to 1) Expand the Existing Base of core industry clusters and start-up ecosystems, 2) Support People through equitable skills and career path development, and 3) Create Place through local strategies and investment in infrastructure and transportation enhancements" (CREDC 2024). We do not see agriculture, or any of its extensions, in this focus.

Clark County's Comp Plan Update Alternative 1, by maintaining existing agricultural land, and designating additional lands as laid out in the Agricultural Resource Lands Study and, in turn, making it available to farmers and food producers, would ensure communities can lead the way in climate change mitigation and resilience, with the implementation of policies such as "encouraging resource-based industries.....which are consistent with rural lands' goals and policies" (Comp Plan Goal: Maintain and enhance opportunities for resource-based industries located on rural lands in Clark County, Policies 9.8).

An existing Goal within the current Comp Plan. 9.2, reads; " Provide commercial and industrial employment opportunities to meet the needs of Clark County citizens." Policy 9.2.1 states "Encourage long-term business investments that generate net fiscal benefits to the region, protect environmental quality and are consistent with the objective of higher wage jobs for Clark County residents"; and 9.2.5 reads "Promote workforce development through collaboration with WSU-Vancouver, Clark College.....to facilitate infrastructure development and other economic development initiatives". Hopefully, with the assistance of an active Agricultural Advisory Commission, partnerships can exist with economic development agencies, such as CREDC and Identity Clark County, to include Agriculture as an economic engine and collaboratively craft programs to incentivize resource-based industries to feed into qualifying farms. Likewise, partnerships with Clark College at Boschma Farms in Ridgefield will build skills and the technological expertise that will help sustain the future of farming in Clark County.

Possible programs that favor the building of agriculture in Clark County are those that put available ag land in the hands of farmers who want and can farm to grow food and meat

processing facilities within the County (currently they are available only in Oregon and Cowlitz County, which is a disadvantage for those raising livestock) and requiring that all warehouses over a certain square-footage must have 10% of its space leased or purchased by a business that serves agricultural businesses (ie., cold storage, dry storage, farm equipment rental and repair, commercial kitchen space, food processing facilities); or the requirement that warehouses, RV parks, storage facilities, manufacturing facilities must devote an acre or two to an incubator farm.

CONCLUSION

We cannot dismiss the importance of farming, growing food, managing livestock, growing hay to feed that livestock, and growing flowers that protect our pollinators. We must have the strength to affirm the current agricultural designations and, now, affirmatively designate that those lands with “prime-quality soil” be Ag Lands such that we as a community can use those lands to our community’s collective benefit. The failure of the DEIS to address these issues makes it flawed.

Friends of Clark County maintains that goals, policies and programs should be implemented that are specifically designed to promote the agricultural economy. This does not mean farm work only, it means a fully functional localized food system. The infrastructure necessary to build and sustain a healthy, thriving ag sector combines a variety of skills and expertise, and, when successful, these jobs can be more sustainable over the years than construction. Just as housing is essential to our economy by providing jobs and building future shelters for our communities, agriculture not only provides an infrastructure filled with small business opportunities, agriculture strengthens our ability to feed our future.

ELEMENT: TRANSPORTATION

Submitted By Jim Byrne, Retired Fish And Wildlife Biologist, Teresa Hardy, Sierra Club

The GMA requires that local comprehensive plans include a transportation element. The GMA further created a formal mechanism for local governments and the state to coordinate transportation planning. The Washington State Growth Management Act (GMA) requires that local land use and transportation systems be balanced and that land use decisions consider transportation needs and impacts. The GMA also requires that local and regional plans be coordinated.

Both Alternative 2 and Alternative 3 would require significant transportation improvements to reduce congestion and achieve a system-wide level-of-service, such as widening the road network, improvements to CTRAN, new bike lands, sidewalks, and construction of new park and ride lots.

Reducing the amount of UGA expansion or the intensity of growth in outlying urban growth areas, or at a minimum, developing a mechanism to delay growth in certain areas until funding is available is needed. Concurrency is required for this to be successful.

Analysis - Key Differences Across Alternatives

Congestion: According to the DEIS, Alternative 3 has the least congestion and vehicle-hours of delay, while Alternative 1 has the highest congestion and delay, but there is NO quantitative data available to support this. No data is provided to show

there would be reduced bridge crossings, either. We know that Alternative 1 can accommodate virtually all of the population allocations for jobs as well.

We do not see data to support the DEIS analysis of Alternative 3. Previous comp plans have focused on increasing sprawling residential development in order to try to keep up some revenue. Broad, and mostly expensive, housing developments should not be a conduit for turning prime farmland and farmlands of statewide significance into housing units.

Previous comp plans have focused on preventing Clark County from becoming a Portland bedroom community. The past two Comprehensive Plan Updates did not attain this goal.

The existing Comp Plan calls for a “higher degree of balance between housing and employment.” Although this may be an existing goal and is strongly supported by FOCC, we are not seeing this in current County practice (e.g. 179th Street).

The model generated by the Regional Transportation Council (RTC) may have a bias for increased transit.

Transit and Active Transportation: The DEIS study proposes that Alternatives 2 and 3 will provide better opportunities for transit and active transportation due to increased density and UGA expansions, but no evidence is provided. Alternative 1 can also provide higher density areas and improved transit, whereas UGA expansion will induce sprawl in many areas.

Under all alternatives, we need to create more Park & Rides for cars in unincorporated Clark County. Currently there are only three, and all are at or near capacity.

Under all alternatives, attention needs to be on the public transit that can adequately supply the needs of the individuals in the more walkable areas and provide adequate transportation.

- Additional safe bike lanes especially north and south. (Current data: only 177 miles of conventional striped bike lanes, and most bike lanes are in Vancouver).
- Sidewalks throughout the County are needed to accommodate pedestrians, wheelchairs, and scooters. (Current data shows 123 total miles of multi-use paths (44 miles paved and 79 miles unpaved)
- 415 miles of shared roadway on moderate and higher traffic streets
- 74 miles of shared roadway on lower traffic streets

All three Alternatives require a major expansion to Transportation goals:

- **Freight Mobility:** All alternatives have similar impacts on freight mobility, with Alternative 3 showing slightly lower vehicle-hours of delay. No significant impact especially in non-peak hours. Only five and 15 hours are saved respectively Alternative 1 (787) Alternative 2 (782) and Alternative 3 (762). Does not support Alternative 2 & 3 as superior to Alternative 1.
- **School Transportation:** Morning peak congestion under all alternatives may impact school bus operations, with Alternative 1 *likely* creating the greatest impact. Likely is not proof. More data is necessary.
- **Rail Transportation.** BNSF has two rail corridors; all Alternatives are

affected the same. Vancouver Junction Railroad (PVJR) is responsible for freight operations. On the line north of Heisson, the Battle Ground, Yacolt, and Chelatchie Prairie Railroad Association (BYCX), a volunteer group, operates a passenger excursion program originating in Yacolt.

Mitigation Measures All can be fulfilled under Alternative 1.

FOCC supports the implementation of transportation improvements identified in the 2024 Regional Transportation Plan (RTP), including roadway upgrades, transit expansions, and active transportation facilities.

- Encourage balanced growth between housing and employment to reduce trip lengths and congestion.
- Develop parallel arterial and collector roadways to reduce demand on state highways.
- Consider alternative mitigation strategies for urban roadways with contextual constraints, such as intersection capacity improvements, transit enhancements, and active transportation infrastructure.
- Improvements to infrastructure must follow concurrency, occurring at the same time, or prior to development. If not, the County has a six year timeframe to complete infrastructure projects.
- Maintain and expand mixed-use zoning in order to make living, working, and shopping a walkable experience.

Additionally, land use patterns and traffic shifts can also exacerbate the issues posed by **climate change**, as well as lead to greater vehicle emissions of greenhouse gases that contribute to hazardous and severe climate change events. Low-density and non-contiguous development can result in a greater number of vehicle miles travelled, and result in the removal of trees and vegetation that can help mitigate extreme temperatures.

CONCLUSION

Taken together, it follows logically that preventing UGA expansion paired with building density, building safe multimodal infrastructure (as required by new climate planning), and providing robust public transit comparable with drive times would reduce traffic congestion and vehicle miles traveled. The DEIS does not provide data to show otherwise. Therefore, FOCC believes that Alternative 1 would still have the least environmental impacts.

Best regards,

Ann Foster, President
Friends of Clark County