

**From:** [Jeffrey Delapena](#)  
**To:** [Sylvia Trujillo](#); [Cnty 2025 Comp Plan](#)  
**Cc:** [Oliver Orjiako](#); [Jose Alvarez](#); [Jenna Kay](#)  
**Subject:** RE: Comments on Draft SEPA EIS for the 2025 Clark County Comprehensive Plan Update – Opposition to Business Park Expansion Near NE 50th Avenue / WSU Vancouver and NE 179th Street (Ramble Creek / Salmon Creek area)  
**Date:** Monday, December 1, 2025 10:43:10 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

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Good day, Sylvia,

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

The amended comments will be included in the Index of Record.



**Jeff Delapena**  
Program Assistant  
COMMUNITY PLANNING

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**From:** Sylvia Trujillo <[sylviajtrujillo@yahoo.com](mailto:sylviajtrujillo@yahoo.com)>  
**Sent:** Sunday, November 30, 2025 8:37 AM  
**To:** Cnty 2025 Comp Plan <[comp.plan@clark.wa.gov](mailto:comp.plan@clark.wa.gov)>; Sue Marshall <[Sue.Marshall@clark.wa.gov](mailto:Sue.Marshall@clark.wa.gov)>  
**Subject:** Re: Comments on Draft SEPA EIS for the 2025 Clark County Comprehensive Plan Update – Opposition to Business Park Expansion Near NE 50th Avenue / WSU Vancouver and NE 179th Street (Ramble Creek / Salmon Creek area)

You don't often get email from [sylviajtrujillo@yahoo.com](mailto:sylviajtrujillo@yahoo.com). [Learn why this is important](#)

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This amends the comments filed yesterday and

NOTE: A full, detailed comment letter was submitted via email on Saturday, November 29, 2025, containing the complete analysis and supporting evidence. The earlier emailed version should be considered the official full submission and this amends and adds to the earlier version.

## **I. INTRODUCTION**

We submit these comments on behalf of Concerned Residents of Ramble Creek, a group of homeowners, families, and small agricultural landowners located in the Salmon Creek / NE 50th Ave / NE 179th Street corridor.

Our community is directly adjacent to the area where Alternatives 2 and 3 of the Draft DEIS propose an enormous expansion of the Business Park (BP) designation, including:

- The largest business park in the county, located east of NE 50th Avenue and immediately adjacent to WSU Vancouver,
- Substantial expansion north toward NE 179th Street, affecting many rural homes, farms, and small acreages,
- Conversion of existing AG-20 farmland, Urban Reserve, R-5, and Mill Creek Overlay lands into urban employment uses,
- And creation of an industrial/commercial island inside one of Clark County's most sensitive watersheds.

This area includes:

- Salmon Creek, a 303(d)-listed impaired waterbody for temperature, turbidity, bacteria, and dissolved oxygen,
- Mill Creek, adjacent to WSU Vancouver, a watershed with special protections,
- The Mill Creek Overlay District, intended to maintain rural character and

environmental quality,

- Critical aquifer recharge areas, wetlands, floodplains, and high-value wildlife habitat,
- Existing rural and farm homes, including the Ramble Creek neighborhood.

The Draft EIS does not adequately identify, analyze, or mitigate the significant adverse impacts that would result from establishing the county's largest business park in this location.

For this reason, we request that the County:

1. Remove the proposed 50th Ave/179th Street Business Park expansion from the preferred alternative;
2. Consider Alternative 1 or a modified alternative centered on infill, existing UGA capacity, and employment near NE 199th/I-5;
3. Conduct a legally adequate Final EIS that includes required site-specific watershed, noise, air-quality, agricultural, and rural-compatibility analysis;
4. Protect the Salmon Creek and Mill Creek watersheds, and honor existing Mill Creek Overlay planning commitments;
5. Avoid the unnecessary conversion of productive farmland and rural residential neighborhoods into a heavy-traffic industrial corridor.

## **II. THE DRAFT EIS DOES NOT ADEQUATELY EVALUATE WATERSHED IMPACTS FROM THE 50TH AVE BUSINESS PARK**

### **A. Salmon Creek is 303(d)-listed, sensitive, and already degraded**

Salmon Creek is the largest watershed entirely within Clark County and is

impaired for multiple Clean Water Act parameters. The Draft EIS acknowledges that:

- Expanded urban development in this watershed will expose additional stream miles to urban pollution,
- Increased impervious surfaces will increase pollutant loading and temperature,
- Fish and wildlife habitat will be fragmented,
- And rural waterways will face greater stress.

However, the DEIS fails to perform the level of site-specific analysis required for a watershed of this importance.

## **B. The DEIS aggregates watershed impacts across the county instead of analyzing the NE 50th location directly**

The DEIS reports that under Alternative 3:

- UGAs would incorporate an additional 12 miles of streams, including 0.3 miles of Salmon Creek,
- UGAs would absorb 541 acres of wetlands,
- UGAs would expand into 2,488 acres of critical aquifer recharge areas,
- And urban development would expand over 125 acres of floodplains.

But these figures are countywide, and not specific to the 50th Avenue sub-basin.

For a project proposing to place the county's largest business park directly above Salmon Creek and Mill Creek, mere aggregate mileage and acreage data do not satisfy SEPA requirements.

## **C. No sub-basin modeling or hydrologic impact assessment**

## **was performed**

A legally sufficient EIS should evaluate:

- Stormwater peak flows,
- Low-flow impacts from reduced recharge,
- Thermal pollution effects,
- Sedimentation and turbidity increases,
- Bacteria, dissolved oxygen, and nutrient contributions,
- Cumulative effects combined with other developments in the basin.

None of this appears in the DEIS.

## **D. The DEIS does not incorporate existing TMDLs or antidegradation policies**

Under the Clean Water Act and Washington's water-quality standards (WAC 173-201A):

- Impaired waters like Salmon Creek cannot receive additional pollutant loads without mitigation,
- Antidegradation requires maintaining and protecting existing water quality,
- TMDLs limit allowable pollutant contributions.

The DEIS does not analyze whether the proposed UGA expansion and eventual business park conflicts with these legal constraints.

## **E. The DEIS fails to consider the Mill Creek Overlay District, WSU Vancouver watershed protections, and existing stormwater basin plans**

The Mill Creek Overlay is intended to maintain rural character and protect an environmentally sensitive tributary system.

The DEIS does not evaluate:

- Whether BP expansion is consistent with overlay policies,
- Whether the overlay remains meaningful if immediately adjacent land becomes industrial,
- How business park traffic, lighting, and impervious surfaces affect the overlay's rural objectives.

It also neglects WSU Vancouver's Salmon-Safe certification and existing watershed protections on campus.

In short, the DEIS ignores existing planning commitments meant to protect these watersheds.

### **III. EXPANSION OF THE BUSINESS PARK TO NE 179TH ST REQUIRES SITE-SPECIFIC NOISE AND AIR-QUALITY ANALYSIS**

#### **A. The NE 179th corridor is already stressed and residential**

NE 179th Street contains:

- Newer subdivisions (including Ramble Creek),
- Existing farms and small agricultural operations,
- Rural homes with longstanding community ties,
- Narrow, constrained roadways.

The DEIS:

- Does not analyze noise impacts along NE 179th,
- Does not evaluate diesel truck emissions,
- Does not analyze impacts on vulnerable populations,
- And does not examine cumulative effects of roadway congestion and construction.

## **B. DEIS admits noise problems—but provides no analysis for this specific location**

The DEIS acknowledges that:

- Industrial uses create higher background noise,
- Rural communities converting to urban areas experience significant noise changes,
- Noise ordinances are difficult to enforce.

But there is no corridor-level analysis for NE 179th or NE 50th, despite being immediately adjacent to the proposed development.

## **C. No analysis of Washington noise standards (WAC 173-60)**

WAC 173-60 sets maximum permissible noise levels for residential areas (Class A EDNAs), but the DEIS does not apply these standards to:

- Proposed truck routes,
- Industrial loading operations,
- 24-hour light industrial activity.

Clark County cannot rely on “future project review” to correct location-selection errors made at the Comprehensive Plan stage.

## **D. Lack of air-quality modeling is insufficient for such a large industrial proposal**

The DEIS states that no air-quality modeling was performed.

Given the high volume of heavy-duty diesel traffic expected for a regional business park, this is not acceptable for a SEPA EIS.

The NE 179th corridor includes:

- Children,
- Elderly residents,
- Individuals with medical conditions,
- Agricultural activities sensitive to particulates including beekeepers with land adjacent to 179th near the intersection with 50th.

Diesel particulates (PM2.5) and NOx emissions are known to affect respiratory health, cardiovascular systems, and fetal development. These impacts are probable and significant and must be analyzed.

## **IV. THE DEIS FAILS TO EVALUATE LAND-USE COMPATIBILITY, FARMLAND LOSS, AND RURAL CHARACTER**

### **A. AG-20 and Urban Reserve lands near NE 50th and NE 179th would be irreversibly converted**

The DEIS notes that Alternative 3 alone would remove:

- ~1,400 acres of agricultural land,

About 5% of all agricultural land in the county.

But the DEIS then concludes this is “not substantial.”

This statement conflicts with:

- The GMA’s directive to conserve agricultural lands,
- Clark County Comprehensive Plan policies on agricultural viability,
- Local commitments under subarea plans.

The NE 50th area represents some of the last contiguous farmland near Vancouver.

## **B. The DEIS acknowledges UGA expansions that are “not compatible with surrounding rural uses”**

In multiple sections, the DEIS notes:

- That Alternative 3 includes UGA expansions where urban uses are “not compatible with surrounding areas,”
- That non-contiguous expansions are problematic,
- That rural character will be significantly degraded.

Yet it does not identify the NE 50th/NE 179th expansion as a clear example of this problem.

## **C. Existing Business Park**

Residents report that the existing BP zone east of NE 50th remains limited after nearly a decade and only recently is a large section under development that will place significant strain on the watersheds.

Before expanding the BP footprint, the County should demonstrate market need and justify why new BP acreage must be placed in the most environmentally

sensitive location.

## **D. Rural character protections are undermined**

The Mill Creek Overlay and other rural policies are meant to:

- Protect natural landscapes,
- Support farming and small rural businesses,
- Maintain view corridors and open space,
- Preserve quiet rural living conditions.

The DEIS does not analyze how a sprawling business park aligns—or fails to align—with these goals.

## **V. THE ALTERNATIVES ANALYSIS IS INADEQUATE UNDER SEPA**

Under SEPA (WAC 197-11-440), an EIS must evaluate reasonable alternatives, including:

- Alternatives in different locations,
- Alternatives that avoid environmental impact,
- Alternatives that still achieve underlying policy goals.

The DEIS does not analyze a single alternative that places the business park:

- Away from Salmon Creek and Mill Creek,
- Near NE 199th Street/I-5,
- Or in any area with superior freeway access and lower environmental sensitivity.

The County clearly has the authority to direct business park development to NE 199th or other sites already identified for employment.

By failing to evaluate these alternatives, the DEIS does not comply with SEPA.

## **VI. CLIMATE REQUIREMENTS (HB 1181) ARE NOT MET**

With the passage of HB 1181, the GMA now requires counties to:

- Reduce greenhouse gas emissions,
- Reduce per-capita vehicle-miles traveled,
- Site development where multimodal transportation can reduce emissions.

Placing the largest business park in the county:

- In a rural-edge location,
- With poor transit service,
- With no multimodal network,
- With long commute distances,

...clearly increases VMT and emissions.

The DEIS does not analyze:

- Worker commute trip emissions,
- Truck freight emissions,
- Impacts on GHG reduction targets,
- Climate resilience of the Salmon Creek basin.

## **VII. FUTURE PROJECT-LEVEL SEPA REVIEW CANNOT FIX LOCATION**

# **SELECTION PROBLEMS**

The DEIS repeatedly notes that future, project-level SEPA review will occur.

However:

- Once UGA boundaries and zoning are changed,
- The “location” decision is final,
- And project-level SEPA cannot relocate the business park.

Therefore, SEPA requires the County to analyze location-specific environmental impacts now, at the plan-level stage.

Deferring crucial analysis to future review violates SEPA’s requirement that decisions be made with full environmental knowledge.

## **VIII. MITIGATION MEASURES ARE GENERIC, NOT LOCATION-SPECIFIC**

Mitigation in the DEIS consists of:

- Existing critical-areas ordinances,
- Existing stormwater requirements,
- Noise/air regulations,
- Vegetative buffers.

These are baseline legal requirements, not new mitigation tailored to the proposed expansion.

SEPA requires mitigation to be:

- Specific,
- Effective,
- Proportional to the impact,
- And based on disclosed environmental consequences.

The DEIS mitigation approach is therefore insufficient.

## **IX. REQUESTED CHANGES TO THE FINAL EIS AND COUNTY ACTIONS**

We request that the Final EIS:

1. Remove the NE 50th/NE 179th Business Park expansion from the preferred alternative.
2. Provide sub-basin hydrologic analysis for Salmon Creek/Mill Creek.
3. Include noise and air-quality modeling for NE 179th residents.
4. Analyze farmland conversion impacts in detail.
5. Evaluate reasonable alternatives at NE 199th/I-5 and other suitable sites.
6. Ensure compliance with:
  - SEPA significance/alternatives requirements,
  - GMA critical-areas/“best available science” obligations,
  - Clean Water Act TMDL and antidegradation requirements,
  - HB 1181 climate/VMT requirements,
  - Rural character and agricultural land-protection goals.

## **X. CONCLUSION**

The cumulative weight of environmental, legal, and community-impact concerns demonstrates that placing the county’s largest business park in the Salmon Creek/Mill Creek watershed—adjacent to WSU Vancouver, existing

rural homes, farms, and environmentally sensitive lands—is not sustainable, not legally supported, and not consistent with Clark County’s planning obligations.

The DEIS does not adequately evaluate:

- Watershed degradation,
- Noise and air-quality impacts,
- Rural neighborhood impacts,
- Farmland loss,
- Climate impacts,
- Or reasonable location alternatives.

We therefore urge the County to:

- Reject the proposed business park expansion east of NE 50th Avenue and north toward NE 179th Street,
- Select a preferred alternative that protects watersheds and rural communities,
- Conduct a legally adequate Final EIS,
- And relocate any new Business Park capacity to areas such as NE 199th/I-5 where environmental risks are lower and infrastructure is more appropriate.

Thank you for considering this shortened version. The full and complete comments were submitted by email on November 29 and must be included in the official record.

Respectfully submitted,

Sylvia Trujillo’s for herself as a resident and on behalf of Concerned Residents of Ramble Creek

Clark County, Washington

On Nov 29, 2025, at 10:25 PM, Sylvia Trujillo <[sylviajtrujillo@yahoo.com](mailto:sylviajtrujillo@yahoo.com)> wrote:

Dear Planning Commissioners and Councilmembers:

I submit these comments on behalf of Concerned Residents of Ramble Creek, a group of homeowners and neighbors living in the Ramble Creek community and surrounding rural-residential areas between Salmon Creek and Ridgefield. We are directly affected by the proposed expansion of Business Park (BP) and related urban designations along NE 50th Avenue east of the WSU Vancouver campus and northward toward NE 179th Street.

We respectfully request that the County reject the proposed Business Park expansion east of NE 50th Avenue and the associated expansion up to NE 179th Street under Alternatives 2 and 3 in the Draft SEPA EIS, and instead direct any additional employment capacity to more appropriate locations such as the NE 199th Street / I-5 area or other sites with better freeway access and less sensitive environmental resources.

## **1. Summary of Requests**

Specifically, we ask that the Planning Commission and County Council:

- Remove the Business Park expansion along NE 50th Avenue (between roughly NE 159th and NE 179th) from the preferred alternative, in order to protect:
  - The Salmon Creek watershed,
  - The Mill Creek Overlay District and its tributaries,
  - Adjacent AG-20 farmland, Urban Reserve, and

R-5/rural neighborhoods, and

- The natural setting surrounding the WSU Vancouver campus.
- Avoid expanding Business Park or other intensive employment uses up to NE 179th Street, where heavy truck and commuter traffic, air emissions, and noise would directly impact existing residences and small farms.
- Adopt either Alternative 1 or a modified alternative that:
  - Meets job and housing targets primarily through infill and upzoning within existing UGAs, and
  - Places any additional employment land in locations such as the NE 199th/I-5 area, where infrastructure, freeway access, and surrounding land uses are better suited to large business parks.
- Revise the Draft EIS to provide a legally adequate analysis of:
  - Surface and groundwater impacts in the Salmon Creek and Mill Creek sub-basins,
  - Noise and air quality impacts on existing residents near NE 179th and NE 50th,
  - Farmland conversion and rural character, and
  - A reasonable range of alternative siting options for major business parks.

## **2. Water Resources and Watershed Impacts Are Not Adequately Analyzed**

The Draft SEPA EIS correctly acknowledges that converting vegetated areas, wetlands, and floodplains to impervious surfaces increases pollutant loading, alters stormwater flows, and reduces aquifer recharge, and that such changes make it harder to achieve “no net loss” in surface water quality.

At the same time, the EIS admits that its evaluation of surface water impacts is based only on coarse indicators—miles of stream within UGAs, acres of Shoreline Management Act jurisdiction, floodplain acreage, and impervious surface area. Under Alternative 3, for example, the EIS reports that:

- UGAs would gain roughly 12 additional miles of streams, including 0.3 miles of Salmon Creek, 0.2 miles of Curtin Creek, and 1.4 miles of Mill Creek;
- UGA expansions into Vancouver and Battle Ground would add about 228 acres of new shoreline jurisdiction, 125 acres of floodplains, and 145 acres of impervious surface; and
- Expanded UGAs would encompass an additional 2,488 acres of Category 1 and 2 Critical Aquifer Recharge Areas (CARAs), 241 acres of wellhead protection zones, and 541 acres of mapped wetlands.

However, nowhere does the EIS disclose where these additional Salmon Creek and Mill Creek stream miles and shoreline/floodplain acres actually occur, nor does it analyze the site-specific effects of putting the largest business park in the county directly upslope from Salmon Creek and Mill Creek tributaries east of NE 50th Avenue. This is especially concerning because:

- Salmon Creek is a 303(d)-listed impaired waterbody for parameters such as fecal coliform, temperature, dissolved oxygen, and turbidity; Ecology has adopted TMDLs and implementation plans for this basin.
- The County has undertaken stormwater basin planning and SMAP work in the Salmon Creek watershed, including a 2022 study and plan for a Mill Creek tributary (“MIL2”) and ongoing work toward a lower Salmon Creek stormwater management plan.
- The Mill Creek Overlay District (CCC 40.250.060) explicitly implements the Mill Creek Subarea Plan and

applies special development provisions to protect rural character and environmental quality in this watershed.

Under the Washington Growth Management Act (GMA), local governments must designate and protect critical areas (including CARAs, wetlands, and fish and wildlife habitat conservation areas) and must use “best available science” and give special consideration to measures that preserve or enhance anadromous fisheries when adopting regulations and land-use designations. RCW 36.70A.172.

Under SEPA (RCW 43.21C.030 and .031), an EIS must identify probable significant adverse environmental impacts and discuss reasonable mitigation, not simply recite that future development will comply with existing regulations.

Yet the Draft EIS:

- Never connects the proposed NE 50th/WSU business park expansion to the specific TMDL obligations, SMAP work, or Mill Creek overlay objectives for the Salmon Creek basin;
- Treats the entire Vancouver UGA expansion as a single aggregate “bucket,” masking the fact that some of the new urban land lies directly uphill from already-impaired salmon habitat; and
- Provides no sub-basin-scale modeling or analysis of how increased impervious surface and altered drainage patterns in this particular area would affect peak flows, base flows, temperature, or pollutant loads in Salmon Creek and Mill Creek tributaries.

For a basin with known water-quality problems, ESA-listed salmonids, and existing watershed plans, this level of analysis is not sufficient under SEPA or the GMA’s critical areas provisions.

### **Requested EIS revisions for water resources**

We request that the Final EIS:

- Provide sub-basin-specific analysis for the Salmon Creek/Mill Creek area, including the NE 50th business park expansion;
- Evaluate consistency with existing TMDLs, SMAP plans, and the Mill Creek Overlay;
- Quantify the likely increase in impervious surface and runoff within this subbasin and its effect on temperature, bacteria, and dissolved oxygen; and
- Consider mitigation such as avoiding new employment designations in this watershed in favor of locations with lower watershed risk (e.g., NE 199th/I-5).

### **3. Business Park Expansion Near NE 50th Avenue Conflicts with Mill Creek Overlay, Farmland, and Rural Neighborhoods**

Residents in Ramble Creek and neighboring areas live in a transitional landscape of small farms, R-5 rural homes, Urban Reserve lands, and AG-20 farmland, immediately adjacent to the Mill Creek Overlay District, the Salmon Creek watershed, and the WSU Vancouver campus.

Several facts are critical:

- There is already an existing Business Park zone east of NE 50th Avenue that was designated in 2016. According to local residents, this zone was largely underutilized for nearly a decade, with only a couple of active businesses.
- The Draft EIS acknowledges that Alternative 3 contains more instances where rural lands are proposed to be converted to urban zones that are not compatible with surrounding uses and that some non-contiguous UGA expansions are far from urban services and poorly buffered from rural areas.
- Under Alternative 3, approximately 1,400 acres of

agricultural land would be transferred to UGAs (around 5% of the county's agricultural lands), including non-contiguous expansions that convert AG-20 to urban uses. The EIS then downplays this, asserting that 5% "does not represent a substantial loss of resource lands."

From the standpoint of those who actually live here, the proposed BP expansion east of NE 50th Avenue:

- Directly abuts the Mill Creek Overlay District, AG-20 farmland, Urban Reserve, and existing R-5/rural neighborhoods;
- Would place intense commercial/industrial uses within a corridor explicitly planned for rural character, environmental protection, and careful subarea development (Mill Creek Overlay);
- Is not supported by demonstrated market demand; and
- Would permanently foreclose agricultural and rural community uses on some of the last remaining farmland close to Vancouver.

The Friends of Clark County (FOCC) analysis of the DEIS concludes that Alternative 1 can accommodate projected growth within existing UGAs, while Alternatives 2 and 3 "exceed the land capacity needed" and unnecessarily convert rural and agricultural lands, with the DEIS failing to fully detail those impacts.

Under the GMA, preventing the unnecessary conversion of agricultural land to urban uses is an explicit goal, and Clark County's Comprehensive Growth Management Plan calls for maintaining productive agricultural lands and minimizing incompatibilities with adjacent uses.

In light of this:

- There is no legal or policy justification to expand the existing BP zone in a sensitive watershed;

- Doing so conflicts with both the Mill Creek Overlay and the GMA's direction to treat rural and agricultural lands as permanent unless a clear, consistent need is demonstrated; and
- It is precisely the kind of non-contiguous, poorly served UGA expansion that the DEIS itself recognizes as problematic.

#### **4. NE 179th Corridor: Air Quality and Noise Impacts on Existing Residents and Farms**

The Draft EIS's Environmental Health section acknowledges that noise is a serious problem in urbanizing areas and that high-intensity noise or chronic exposure can cause hearing loss, sleep disruption, stress, and cardiovascular effects. It notes that noise impacts are felt most acutely where rural residents live at the edge of converting land uses and along heavily traveled routes.

For Alternatives 2 and 3, the EIS further concedes that:

- Rural and agricultural areas between Vancouver and Ridgefield along I-5 will likely experience a distinct change as they become primarily business and industrial;
- Rural quiet will be greatly altered, with little intervening rural land remaining to buffer noise; and
- Under Alternative 3, UGA expansions that convert rural and agricultural lands to commercial/industrial uses will increase noise impacts to surrounding rural areas, especially around business and industrial uses and heavy traffic.

However, the EIS:

- Provides no localized noise analysis for existing homes and farms along NE 179th Street, even though the corridor is already under significant stress and is the subject of a specific Access Management and Circulation Plan and multi-year road construction projects to address congestion

and safety.

- Treats mitigation in generic terms—buffers, noise ordinances, and building design—while admitting that noise enforcement is often difficult and that many conflicts remain unresolved.

On air quality, the EIS notes that the region is in attainment for ozone and carbon monoxide and then explicitly states that “air quality modeling was not performed for this plan level of analysis.” In other words:

- There is no quantitative analysis of diesel particulate, NO<sub>x</sub>, or other pollutants that would result from large business parks and associated truck traffic near existing homes on NE 179th;
- No evaluation of localized exposure for vulnerable populations (children, elderly, people with respiratory conditions); and
- No environmental justice analysis of placing disproportionate noise and air burdens on existing rural-residential communities while the economic benefits are distributed countywide.

Given that the NE 179th corridor is already constrained and heavily trafficked, placing the county’s largest business park immediately adjacent to existing homes and farms is likely to result in substantial, long-term degradation of neighborhood air quality and sound levels—impacts that are simply not evaluated in the Draft EIS.

### **Requested EIS revisions and policy choices for NE 179th**

We request that the County:

- Either remove or substantially scale back the business park expansion near NE 179th, or
- At minimum, require:

Selection of alternative locations (e.g., NE 199th/I-5) for the most intensive and truck-heavy uses.

- Enhanced air-quality and noise analysis and mitigation at project-level review
- Alternatively, wide, permanently protected vegetated buffers between industrial traffic and residences; and,
- Building orientation and site design that minimize loading bays and truck routes adjacent to homes;

## **5. Reasonable Alternatives and Alternative Siting (NE 199th and Other I-5 Locations)**

SEPA requires that an EIS discuss a reasonable range of alternatives, including those that would avoid or minimize adverse environmental impacts. RCW 43.21C.030(2)(c). In this Draft EIS:

- All action alternatives (2 and 3) assume that major employment growth will be accommodated in part by a very large business park cluster between NE 50th and NE 179th, in one of the most environmentally sensitive and rural-residential areas of the Vancouver UGA fringe.
- There is no alternative that:
  - Protects the Salmon Creek/Mill Creek watershed from new business park expansion, and
  - Shifts that employment capacity to areas with better freeway access and fewer conflicts, such as the NE 199th Street/I-5 area and other locations already being planned for intensive development.

FOCC's comments persuasively argue that Alternative 1 can already accommodate projected housing and job growth within existing UGAs, and that Alternatives 2 and 3 unnecessarily expand UGAs and convert rural and agricultural lands in ways that conflict with GMA goals and climate objectives. In light of this:

- A “watershed-protective” alternative that eliminates or downsizes BP expansion along NE 50th and NE 179th and instead uses NE 199th/I-5-adjacent land (or other appropriate employment sites) must be considered; and
- The County should seriously evaluate making Alternative 1 or a **strengthened “infill first” hybrid the preferred alternative, rather than any option that relies on major employment expansion in the Salmon Creek/Mill Creek corridor.**

## 6. Additional Legal and Policy Considerations

A few additional points bear emphasis:

- **Protection of Critical Areas and Fisheries**  
Under RCW 36.70A.172, Clark County must use best available science and give special consideration to anadromous fish when designating and protecting critical areas. Salmon Creek is a key tributary to Lake River and the Columbia River system, and its function for fish and wildlife is highlighted in both the DEIS and regional salmon recovery planning. Expanding business parks in its headwaters is inconsistent with the spirit of those requirements.
- **Antidegradation and TMDLs (Clean Water Act)**  
Section 303(d) of the Clean Water Act requires Washington State to identify impaired waters and implement TMDLs that cap pollutant loads. State water-quality standards contain antidegradation policies that prohibit further degradation of high-quality and impaired waters. The EIS should explicitly analyze whether UGA expansions and associated business park build-out in the Salmon Creek basin are compatible with these load allocations.
- **Farmland as Irreplaceable Resource Land**  
The EIS’s characterization of a 5% reduction in agricultural lands as “not substantial” does not reflect the reality that farmland, once paved, does not come back. The GMA

discourages unnecessary conversion of agricultural lands and Clark County's own plan policies (e.g., Policy 3.5.6 and 3.5.9 as cited in the DEIS) call for limiting nearby residential and urban development to maintain agricultural viability and buffering.

- Consistency with County Environmental and Watershed Goals  
Clark County's adopted environmental element and stormwater planning documents emphasize developing watershed protection programs that are "salmon-friendly" and that prevent deterioration of local water resources, with special attention to watersheds like Salmon Creek that already have detailed stormwater and habitat planning efforts.

## **7. Conclusion**

For all of the reasons above, the Draft SEPA EIS does not adequately consider the adverse impacts of:

- Expanding the Business Park designation along NE 50th Avenue east of WSU Vancouver in the Salmon Creek/Mill Creek watershed; and
- Expanding Business Park and related employment designations to NE 179th Street, where they would directly burden existing rural-residential communities and small farms with increased noise, air pollution, and traffic.

### **We therefore ask Clark County to:**

1. Reject the Business Park expansion near NE 50th Avenue and Salmon Creek, and maintain or downzone this area consistent with the Mill Creek Overlay and watershed protection goals;
2. Avoid expanding intensive employment uses up to NE 179th Street, or, if any expansion occurs, require robust buffers, site design standards, and project-level SEPA review that meaningfully protect existing residents;

3. Adopt either Alternative 1 or a revised alternative that meets job and housing targets without expanding large business parks in the Salmon Creek/Mill Creek corridor; and
4. Fully revise the Final EIS to address the water-quality, noise, air-quality, farmland, and alternatives issues identified in this letter.

Thank you for your consideration of these comments and for your work on the Comprehensive Plan Update. Please include this letter in the official record for the 2025 Comprehensive Plan Update Draft SEPA EIS.

Sincerely,

Sylvia Trujillo

On behalf of Concerned Residents of Ramble Creek