

From: [Jeffrey Delapena](#)
To: [Patricia Presson](#); [Cnty 2025 Comp Plan](#)
Cc: [Oliver Orjiako](#); [Jose Alvarez](#); [Jenna Kay](#)
Subject: RE: Clark County Comprehensive Plan Update
Date: Monday, December 1, 2025 11:44:32 AM

Good day, Patricia,

Thank you for this feedback related to the Draft Environmental Impact Statement and 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

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-----Original Message-----

From: Patricia Presson <ppresson@hotmail.com>
Sent: Sunday, November 30, 2025 4:08 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Subject: Clark County Comprehensive Plan Update

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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:

A. 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.

B. 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.

C. 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.

D. 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, NOx, 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:

- 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;
- 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;
- 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
- 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,
Pat Presson