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To: randal@camasearthdaysociety.com; [Oliver Orjiako](mailto:Oliver.Orjiako@clark.wa.gov)
Cc: [Cnty 2025 Comp Plan](#); [Jose Alvarez](#); [Jenna Kay](#)
Subject: RE: DEIS COMMENT
Date: Monday, December 1, 2025 4:44:10 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Randal,

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
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From: Randal Friedman <randal@camasearthdaysociety.com>
Sent: Saturday, November 29, 2025 12:55 PM
To: Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>
Cc: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>; Sue Marshall <Sue.Marshall@clark.wa.gov>; Matt Little <Matt.Little@clark.wa.gov>; Denis Hayes <denis@denishayes.com>; Molly Williams <molly@camasearthdaysociety.com>; Glen DeWillie <glen@camasearthdaysociety.com>; Alan Peters <APeters@cityofcamas.us>; Tyler Sanders <strongtownscamas@gmail.com>; Jenna Kay <Jenna.Kay@clark.wa.gov>; Caroline Mercury <camaswamillinfo@downtowncamas.com>; Heidi Cody <heidi@waconservationaction.org>; Don Steinke <crvancouverusa@gmail.com>
Subject: DEIS COMMENT

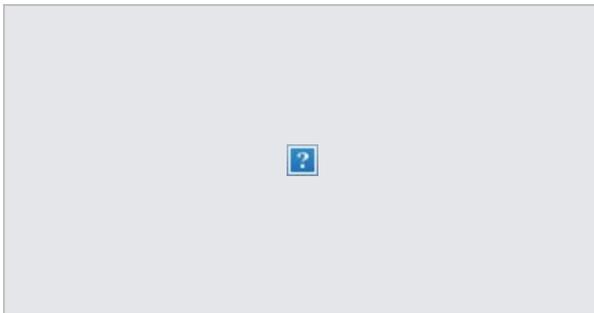
You don't often get email from randal@camasearthdaysociety.com. [Learn why this is important](#)

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.

Oliver — As follow-up from our meeting last month, attached please find comments from the Camas Earth Day Society.

We appreciate the County's attention to this planning issue and alternative that while respecting Camas' past will define Camas' future as one of sustainability.

Randal Friedman
Land Use Policy
Camas Earth Day Society



[DEIS Comment Camas Alternative 3](#)
online.flippingbook.com

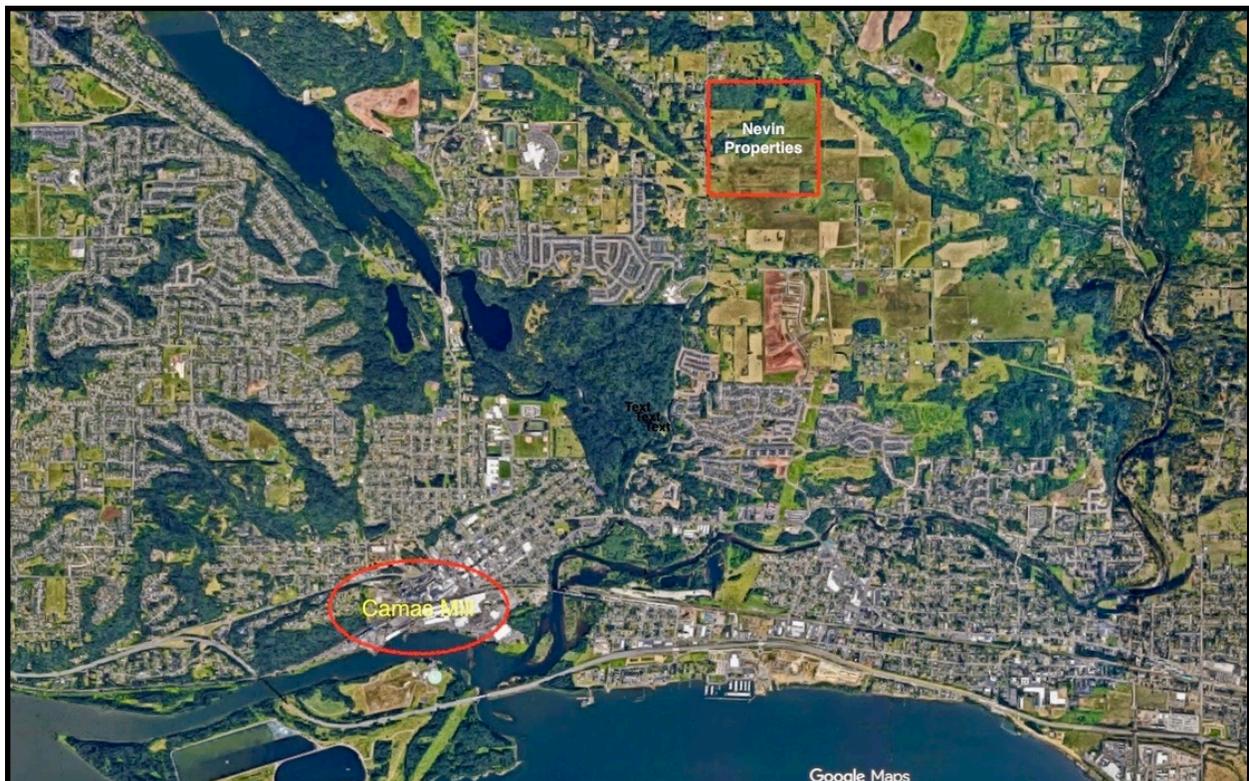


Draft Environmental Impact Statement
2045 Clark County, WA Comprehensive Plan Update
The Camas Earth Day Society

Introduction: The Camas Earth Day Society (CEDS) is a non-profit organization dedicated to the stewardship of our natural environment in Camas, preserving and furthering the legacy of Earth Day. Through education, outreach, conservation actions and advocacy for the environment, our organization champions the same Earth Day principle that many individual actions can produce a sustainable, collective impact for our environment.

Our vision for a more sustainable future creates an opportunity to comment on the County's Draft Environmental Impact Statement (DEIS), the foundation for the 2025 Comprehensive Plan update. We respectfully submit our comments that seek to reduce environmental impacts within Clark County and provide another option to the Comprehensive Plan's Alternative 3.

Project Vicinity Map



PROJECT: The “project” referred to is the specific request to add roughly 160 acres of currently zoned agricultural land beyond the current Urban Growth Boundary (UGB) to Camas’ Urban Growth Area (UGA). The project, for the State Environmental Protection



Act (SEPA) review purposes, is contained within Alternative 3. The land is located at a convergence of a significant swath of East Clark County's rural landscape. As required by SEPA, the analysis would reasonably be expected to include and evaluate similar requested actions once the 2,700 units allowed were built. This would include UGB additions. This adjoining land, for SEPA consideration, would be considered available for development. These impacts fall within the definition of "indirect impacts" required in the analysis. The SEPA Handbook identifies this requirement and for definition provides "Examples include increasing traffic on local roads, setting a precedent for future growth, and reducing the capacity of a sewage treatment plant or water supply system¹."

This has already been the case in Camas as it transitions from the well-defined footprint of a classic mill town to a fast growing suburb in the Portland Metropolitan Statistical Area. The Alternative 3 submittal will be acknowledged for these comments as the "Nevin" properties.

BASIC SEPA REQUIREMENTS ARE NOT MET. In evaluating the DEIS treatment of the Nevin properties the following issues are considered.

- Transparency
- Growth-inducing impacts
- Coarse Granularity Hides Traffic.
- Wildland Fire Risk
- The Ponzi Scheme
- Consideration of Alternatives
- "Revitalization" and "Current and Long-Term Operations"
- Public Participation
- Transfer of Development Rights

Transparency. While included in the County's process, the Nevin properties were only recently included in *Our Camas 2045's* Preferred Land Use Map. Consider the ability for public discovery through the Camas process.

The screenshot on Page 3 was taken 17 days after the publication date of the DEIS. This graphic represents the start of DEIS public review. This Camas posting, then the up-to-date public graphic, shows the Nevin properties, outlined in orange, outside the City of Camas and outside the UGA. This means Camas' Alternative 3 proposal for the County's independent process was not subject to sufficient public notice and review. Adequacy of public notice/review requires consideration for determining whether this meets requirements of the Growth Management Act (GMA) and SEPA.

This is the matter-of-fact manner the Nevin properties surfaced in the city's public process. It appeared mid-November on the web-posted map. A Camas resident who

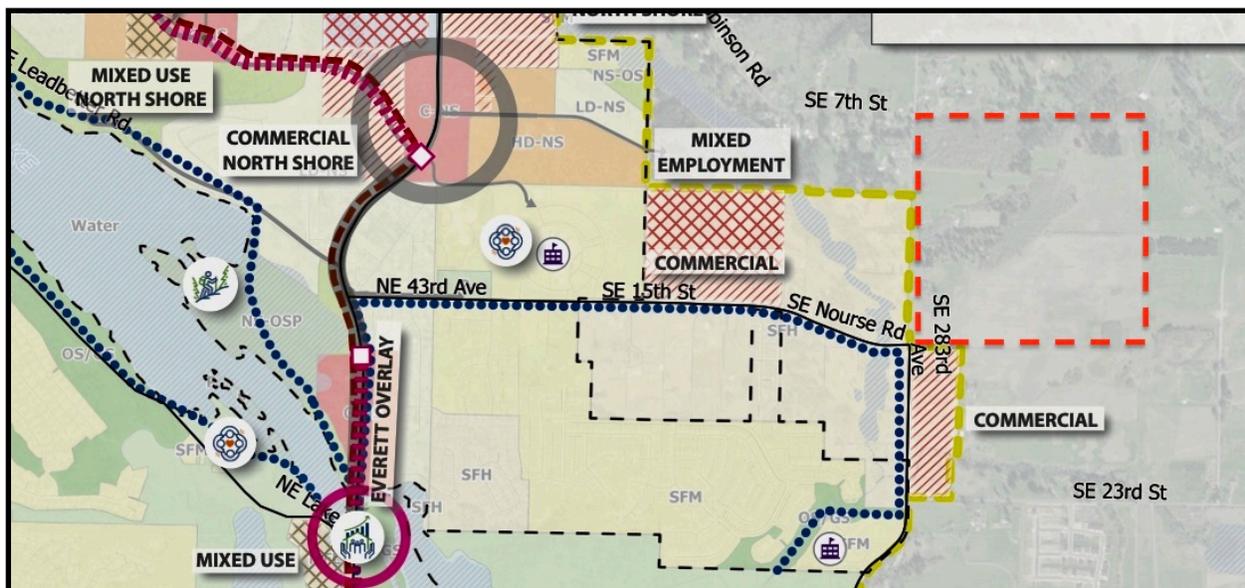
¹ <https://apps.ecology.wa.gov/publications/documents/2506009.pdf>



looked at the City's posted map On October 18th saw no reason to consider the Nevin properties an issue. This questions whether that Camas resident would then react to County posting requirements thinking Nevin properties were not an issue. For public notice, the County's are broader and less inclusive than a city's obligations.

Even with extreme due diligence, it is not reasonable to expect this Camas resident who followed the city's own planning process to have the knowledge, understanding and elements of a different level of government's independent process.

Screen shot of Preferred Land Use Map Oct. 18, 2025



Most in Camas lack knowledge of Camas' proposed action for including the Nevin properties within the UGA. This demonstrates Camas' planning process' lack of transparency. There has been no analysis, or even acknowledgement, of the significant implications for Camas' future. Discussion of the direct relationship between GHG emissions and Land Use this project would create are not present in the DEIS and should be.²

Growth-Inducing Impacts. CEDS believes the Camas community deserves full consideration of the growth-inducing impacts from the proposed removal of agricultural protections AND moving the UGA to intrude into this large rural area. Requiring the extension of basic urban services inevitably leads to more growth.

² The relationship between climate change, land use and brownfields are discussed in CEDS comments to the Department of Commerce's draft Climate Change Handbook.



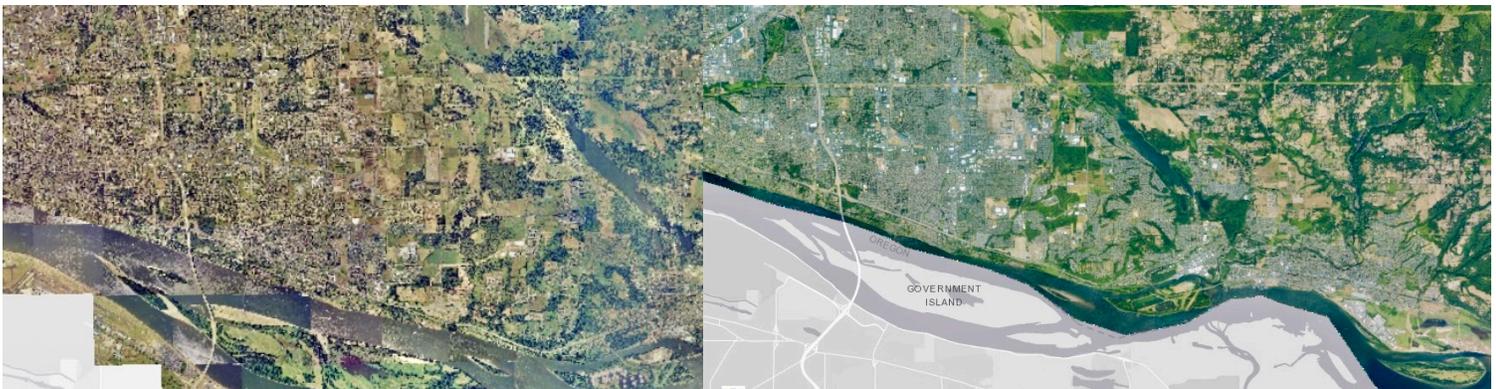
Thousands people could live on 2,700 units under the MF-18 buildout. The strip malls and single-family homes would follow. Hasn't this script played out enough?

Reasonably Foreseeable Growth



The true study area should include something more like the graphic which demonstrates from a topographic status one scenario for the substantial potential for growth inducement. One only need look an an aerial photograph from 1990, when Camas only had 6,000 residents, to see the urban transformation.

East Vancouver/Camas 1990 and 2023

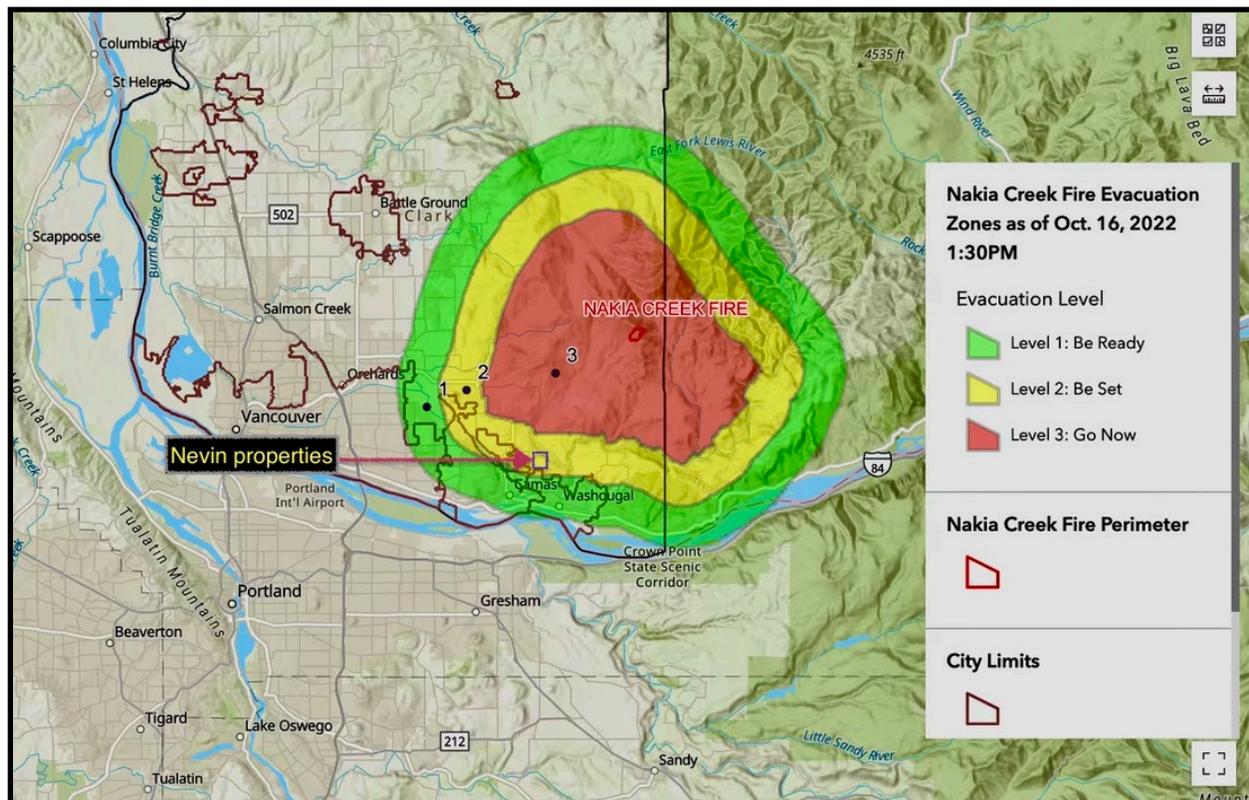


Discussion of these reasonably foreseeable growth inducing impacts of the County's approval sought by Camas staff deserves full public discourse. Private conversations between planning departments, which apparently have not included growth inducing impacts, should not determine our community's future.



Wildland Fire Risk. Consideration of wildfire risk is but one example of the many substantive issues SEPA must consider. The Nevin properties represent the purple square on the following graphic. The yellow band was the “Be Set” evacuation zone for the Nakia fire. How interesting that, other than the North Shore, Camas and Washougal both have stayed out of the yellow. We should consider that a lesson from that fire on where NOT to move that urban/wildfire interface. All of this, including climate and fire risks, needs study to support the County’s consideration and decision. The lessons from the massive loss of life and destruction from the Palisades and Eaton firestorms are real and should be thoroughly considered for the development the Nevin properties and induced growth it would bring.

Nakia Fire Evacuation Zones



The Ponzi Scheme. While there is a great need to appreciate rural East Clark County and protect its resources, there’s also a fiscal angle. The Strong Towns organization has shown the sprawl development style does not pay as much as the development will cost in the long-term. The impact fees are long gone when costly repairs are needed. Many in the Camas community recognize this as the “structural deficit” often talked about facing Camas. The decision on whether to expand future sprawl, from a long-term fiscal consideration, requires consideration. Given the growing structural



deficits plaguing local governments this should be an element of impact analysis. Strong Towns has called this “America's Growth Ponzi Scheme.”³

Consideration of Alternatives. The County is required by the GMA and SEPA to consider alternatives to the proposed action. CEDS maintains that the City of Camas’ refusal to consider even a portion of the Georgia Pacific Camas Mill’s 660-acres of downtown waterfront property, officially designated “non-operational” is not consistent with an alternatives analysis.

Making this more relevant is the Agreed Order between the landowner and the State of Washington. This agreement specifies that a substantial portion this mill property is subject to cleanup order under the Model Toxics Control Act (MTCA). CEDS believes that pursuant to GMA policies, including new housing affordability and climate change requirements, the mill property must be considered as an alternative especially when significant expansions to a UGA into rural landscape are proposed.

“Revitalization” and “Current and Long-Term Operations.” Camas has been abuzz in the last few weeks with a significant milestone in the history of the mill property. The demolition of the Kraft Mill/Bleaching/Boiler Recovery facilities and removal of the substantive buildings and above ground infrastructure makes the soil and groundwater better available for investigation. The City of Camas terms it “multi-year revitalization project.”⁴

A suggestion has been made to the Camas Mill Cleanup Community Advisory Group (CAG) concerning “Interim Actions” and their authority under Washington law. An Interim Action is a process within the MTCA that focuses on a specific problem or area for investigation and cleanup on an accelerated schedule.

What can constitute an Interim Action? Per the Agreed Order, Interim Action is an action “that is needed to provide for completion of a site hazard assessment, remedial investigation/feasibility study, or design of a cleanup action plan. Either party may propose an interim action under this Order.” The Kraft Mill/Bleaching sites, and perhaps the Recovery Boiler, could have consideration for interim actions. This would allow the independent investigation of these large formerly complex industrial areas without being tied to some of the more complex issues involving wetlands, Columbia River and interrelated natural systems. The Kraft Mill site, and more so with the others, open large areas that can link the lab site to Camas' historic downtown. With prior demolitions it provides a physical reconnection to the river and highlights the importance of the cleanup issues raised by the Yakama Nation and Columbia Riverkeeper.

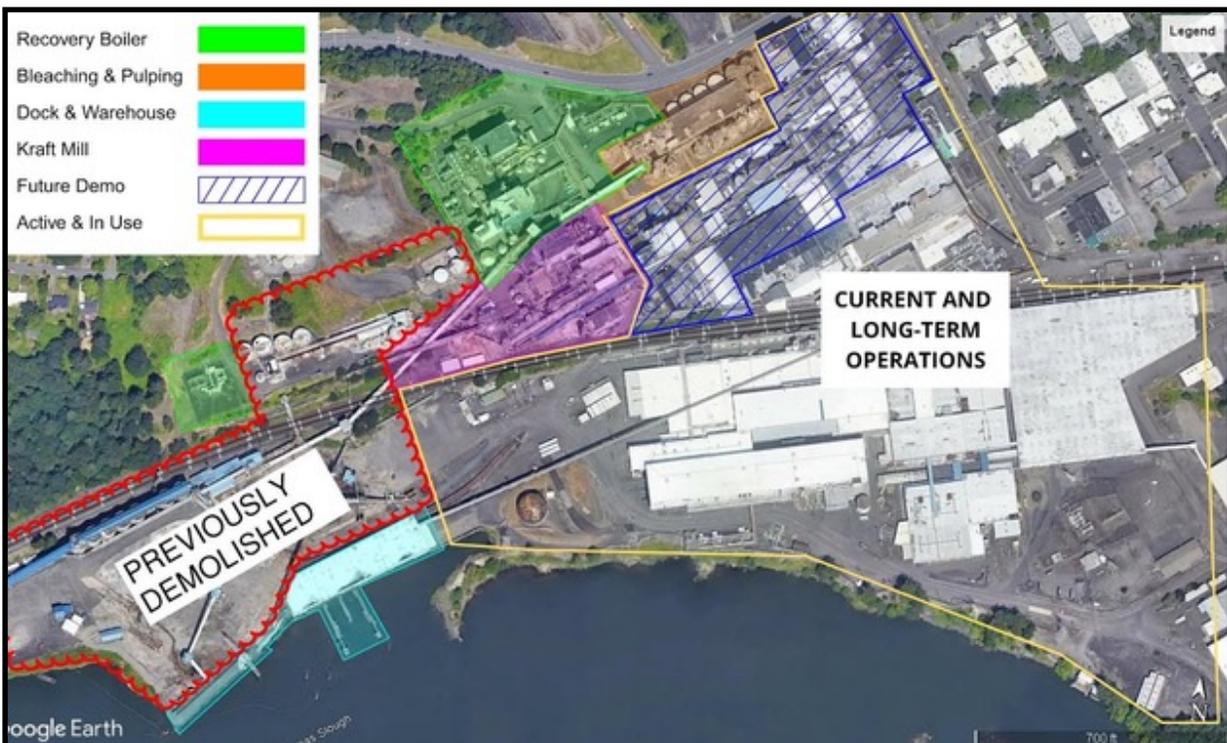
³ <https://www.strongtowns.org/journal/2020-5-14-americas-growth-ponzi-scheme-md2020>

⁴ <https://engagecamas.com/georgia-pacific-camas-mill-revitalization-project>



Speaking of “revitalization” consider the wording and designation of GP’s map shown below. Within clear yellow lines labeled “Current and Long-Term Operations” is an indication of the mill’s long-term thinking. This geographical boundary can be seen as the reminder this property is deemed NOT needed for current and long-term operations. The ability of these designated properties should be considered as part of the future inventory available for an unrestricted cleanup under the MTCA. This outcome is one of long-term sustainability and meeting both affordability and carbon impacts from the project before the Council.

Camas Mill Current and Long-Term Operations



This furthers the need to consider alternatives under the GMA and SEPA for the revitalization of the Camas Mill property before the Council's conversation to change ag to urban per the Alternative 3 Camas proposes.

Ag land should be the last resort for urban development. In the case of *Our Camas 2045* the city’s process does not consider a widely recognized planning alternative involving remediation and reuse of portions of the Camas Mill. These are portions already designated non-operational and under an Ecology Agreed Order under the MTCA. Rather than opening current ag land and inducing urban growth for so much rural area, an alternatives analysis should recognize a future vision for the mill as a renewed employment center for Camas and SW Washington.



There are many examples within Clark County showing this can be the way forward, let alone through the world. CEDS has shown a growing list within Clark County, Washington State, the United States and internationally. The photo shows an affordable housing project recently opened in Bellingham, WA on the site of a remediated Georgia Pacific Kraft Mill.

This April 2024 photos shows construction of phase I of The Millworks Family Housing project. Rachel Showalter The Bellingham Herald <https://www.bellinghamherald.com/profile/264140756>



This alternatives analysis should include consideration whether the Camas Mill property could support an equivalent or better level of development through a downtown core complimenting Camas' Historic Downtown. This could remove the need for ag conversion and a future based on sprawl.

Lacking the element to consider such an alternative, the County lacks information needed to support the City's request: adding the Nevin properties to the UGA could reasonably uncork the pressure in the growth bottle and be accommodated within Camas existing core.

Coarse Granularity Hides Traffic. The DEIS is deficient at a most basic level. The traffic analysis admits that the coarse granularity of the county's analysis prevents sub-analysis of the Nevin properties. In fact, by merging with the beneficial impacts of the rest of Alternative 3, the DEIS notes this could distort location specific issues. This is the case as the DEIS suggests Alternative 3 would reduce overall traffic in Clark County and Columbia River crossings. Staff acknowledged this was unlikely accurate in this instance.

This required traffic analysis is the burden of the City of Camas' compliance with state requirements. CEDS acknowledges the limited ability for the County to do such



analysis. As Camas has not provided this analysis CEDS has provided a recommendation to correct.

Public Participation. Beyond a robust consideration of full direct and indirect impacts of Camas' proposal, this DEIS must include a discussion through a well advertised public meeting. This is beyond the current and less inclusive methods and are needed given the project's scope and history.

The appropriate curing is one offering public, two-way discussion on the record. This is where the project can be shown in daylight and public questions listened to and provided answers. This is basic to both the GMA and SEPA.

If there isn't time for this robust community involvement that Camas needs to do consider this evidence this issue is not ready for prime time.

Transfer of Development Rights. There is discussion that the Clark County Council will be workshopping in the coming year the use of Transfer of Development Rights (TDR) programs as a means to implement policies established by the GMA. A successful TDR program example is found in King County⁵. The Nevin properties provide an example of where development rights might be considered transferrable to locations better suited for increased urban land uses. This could be an additional alternative to consider in an appropriate SEPA analysis.

Conclusion. In this "classic brownfield vs greenfield" battle, the Clark County Council should follow new and longstanding policies of the State of Washington and turn down the City's unnecessary and damaging request. Furthermore, the County should specify these deficiencies and encourage the City of Camas to correct.

Prepared by:

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⁵ See <https://kingcounty.gov/en/dept/dnrp/buildings-property/green-sustainable-building/transfer-of-development-rights>



NEW SECTION 3.1 (D)

City of Camas Alternative 3 special note:

Alternative 3 submitted by the City of Camas includes 160 acres of rural lands adjacent to the UGB. This section acknowledges limitations to the County level of impact analysis due to the city's incomplete submittal, and lack of consideration of several key elements of analysis.

Growth Inducement. Camas' proposed UGA addition represents the introduction of dense, urban development in a rural landscape. Representing an extension of already limited capacity in Camas' roadways, including Crown Road and HWY 500, sufficient analysis of traffic and other impacts are required before consideration for inclusion. These have not been submitted.

Pursuant to SEPA requirements, the County must consider indirect impacts from this action. Indirect impacts include among others growth inducing elements. This proposal, given its geographic and topographic location, would reasonably be seen to serve as a new gateway for urban development. Extension of sewer service, for example, would introduce sewage treatment in an area now served by septic systems on acreage. Examples of development impacts also include water quality (stormwater), air pollution, wildlife and most other subjects required for analysis under SEPA.

The County is required to consider reasonably foreseeable impacts including growth inducement. The City of Camas' submittal did not contain analysis of the potential urban buildout from this intrusion of dense urban uses in wide belt of current rural agricultural land.

Alternatives Analysis. SEPA and the GMA speak to consideration of alternatives as basic to a community's process. The City of Camas did not provide analysis of alternatives for GHG reduction, housing affordability, and long-term sustainability to consider alternatives such as brownfield development. Under the GMA, the lack of consideration of brownfields, and the resultant use of green fields is contrary to the legislature's recent actions to promote affordable housing in developed urban areas and thereby reduce GHG emissions.

As a general finding there is insufficient analysis and public participation for consideration of Camas' Alternative 3 proposal and therefore this document excluded further consideration of this Camas special request. Subsequent sections of the EIS refer to this section in stating there was insufficient information for the County to consider the request given the reasonably foreseeable impacts from this proposal.



GENERIC INCLUSION FOR SUBSEQUENT AREAS OF ANALYSIS FOR CAMAS' SPECIAL REQUEST:

As discussed in Section 3.1. (D), the City of Camas did not provide adequate information to consider compliance with GMA and SEPA requirements and their specific request has been removed from consideration in the County's action.

About the Camas Earth Day Society

The Camas Earth Day Society (2024) is a non-profit organization created to recognize, celebrate and aspire to the principles of Earth Day 1970. The Society created a legacy for Camas, along with the Camas Mill, as a principal root of Earth Day as shown in the Library's evening with Denis Hayes. The Society respects and maintains the legacy of a child growing up in a Camas mill family who went on to change the world. His childhood experiences started Denis Hayes' journey to Earth Day and beyond. Earth Day's amazing and immediate fallout from its 20 million attendees included environmental laws we now take for granted. The Society recognizes current conditions create the need for local, regional and state level actions to become more descriptive to local governments in implementing Washington's policy on climate change. Bringing people together was and continues to be a great lesson from Earth Day.

Beyond our focus on educational work with Camas schools and the century-old Camas Public Library, both of which promote Earth Day principles including native planting and pollinator habitat, the Society is a voice for a community's need for clean air, clean water and the respectable use of land. The Society has worked with a number of community and other stakeholders to develop a draft plan to create a Mill District. While noting the benefits of a new chapter in the mill's storied history, it is designed to be consistent and protective of remaining mill and future industrial opportunities. The Society is involved in working to ensure Camas' water supply, contaminated with Forever Chemicals, is properly studied and remediated.

