From:	Jeffrey Delapena
To:	Steve Thalberg
Cc:	Oliver Orjiako; Jose Alvarez
Subject:	FW: Please forward this comment to the Planning Commission before the August 20 hearing
Date:	Thursday, August 20, 2026 3:03:00 PM
Attachments:	tree crown coverage and clark county.docx image001.png image002.png image003.png image004.png

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Good day, Steve,

Thank you for submitting comments related to tonight's Public Hearing.

I am forwarding to additional staff. These will be added to the Comprehensive Plan Index of Record and brought to the attention of the Planning Commission.

Best,

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558

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From: Steve Thalberg <sathalberg@gmail.com>
Sent: Thursday, August 20, 2026 3:02 PM
To: Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Subject: Please forward this comment to the Planning Commission before the August 20 hearing

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several topics:

1. Appendix A - Transportation Capital Facilities Plan, Strategies to Balance CFP (capital facilities plan) page 48:
the paragraph reads: "*The Transportation Capital Facilities Plan will be reviewed on a regular basis, not to exceed every five years, to ensure that the projected gap between costs and revenues is declining. If the potential shortfall increases and becomes critical, the potential courses of action in addition to those identified above would include reduction in the level of service standards and reassessment of the land use plan.*"

a. delete the words "*If the potential shortfall increases and becomes critical, the potential courses of action in addition to those identified above would include reduction in the level of service standards and reassessment of the land use plan.*", as everything in this section above this paragraph is proposed to be deleted, AND reduction of the level of service standards will only exacerbate traffic issues, and provide no improvement to the situation. the county's concurrency mandates are to be respected.

2. Appendix A - Transportation Capital Facilities Plan, Concurrency Management, page 49:
the paragraph reads: "*The county modified the transportation concurrency program in 2014 to better protect against the unplanned use of newly created roadway capacity, while allowing new developments to be permitted with predictability. In addition, the revised program sets concurrency standards at a level that is consistent with the 20-Year Comprehensive Plan, population and employment forecast, the Capital Facilities Plan and capital funding projections.*"

a. the concurrency program is to protect against unplanned use of ... roadway capacity, while allowing new developments to be permitted with predictability. the county's concurrency mandates are to be respected.

3. Climate Element

a. the county should adopt measures to protect and enhance tree crown cover, as tree crown cover is associated with multiple health benefits (e.g., less preterm birth, less cardiovascular disease, less pulmonary disease, higher home values, less depression and other mental health issues, among others.) (please see the attached document.)

b. housing development is a concern in the county, and the construction of homes, especially high-density dwellings, frequently results in destruction of trees. the county should adopt a tree protection and replacement program. the city of vancouver's urban

tree/forestry program can be used as a template.

c. a measure to protect and enhance tree crown cover will also reduce greenhouse gas emissions, improve air and water quality, and enhance quality of live, which are part of HB1181 (RCW 36.70A.070, RCW 36.70A.020(14), RCW 36.70A.070(9), RCW 36.70A.020, RCW 36.70A.030,

4. GMA requires determination of needed transportation improvements necessary to implement 20-year comprehensive growth management plan (CGMP):

a. is the i-5 exit 11 westbound exit towards Ridgefield included in the 20-year CGMP?

if not, it should be, as ridgefield is the fastest growing area in the county, and the i-5 interchanges at pioneer street and at 179th street are at over-capacity.

i understand these interchanges are at the control of the state, but roads leading to and from those interchanges are at the control of the county.

b. is the i-5 exit 11 westbound exit towards Ridgefield included in the 6-year transportation improvement program (TIP)?

if not, it should be, as ridgefield is the fastest growing area in the county, and the i-5 interchanges at pioneer street and at 179th street are at over-capacity.

i understand these interchanges are at the control of the state, but roads leading to and from those interchanges are at the control of the county.

5. Arterial Atlas Amendments:

a. does the arterial atlas reflect the i-5 exit 11 westbound exit towards Ridgefield, and the various feeder roads to that interchange?

if not, it should, as feeder roads need to be able to handle the traffic to/from the i-5 interchange.

6. Planning Commission / County Council Decision

a. the planning commission is urged to reconsider their adoption of altering the urban growth boundaries for the cities in clark county, as those changes are inadequate in the goals for concurrency (traffic and infrastructure), and the county admits there is a projected $554 million shortfall in funding necessary for transportation improvements (https://clark.wa.gov/sites/default/files/media/document/2026-08/2026-0820-pc-hrg-presentation-comp-plan-update-final.pdf page 23), further setting up conflicts with adhering to goals for concurrency.

7. add to Chapter 4, Environmental Element:
add to 4.3, 4.4, 4.5, 4.10.2: The adoption of a public benefit rating system (PBRS) (currently adopted in 20 of Washington's counties) will enhance to success of meeting

these goals.

8. add to Chapter 5, Transportation Element:
add 5.0.16: Approval of development projects (residential and/or commercial) shall occur without exceeding a volume to capacity ratio (v:c) of 0.9.

sincerely,
steve thalberg
clark county resident

Tree Crown Coverage in Clark County

please consider the following comments for the Environmental Impact Statement portion of the Comprehensive Growth Management Plan for Clark County.

trees benefit long-term health of the local neighborhood citizens, improve neighborhood value, decrease summertime energy use and costs, and have an unmatched positive benefit-cost ratio.

1. health benefits of trees far outweigh any of the other benefits.
2. urban trees have not been properly included in clark county's environmental impact statement, nor in the comprehensive growth management plan for clark county.
3. need to include the health benefits of trees, forests, and green spaces in order to make proper political decisions.
4. trees can absorb air pollution, and air pollution is a risk factor for health problems.
5. trees grow slowly, therefore need to plan now for future benefits.
6. there is strong link between greenness of neighborhood and health.
7. climate change results in more tree mortality. the county need to step up and improve their policy of replacing dying/dead trees.
8. there is currently a failure to see trees as a community resource. this can literally be a matter of life and death. the benefits of trees on a lot spill over to the whole neighborhood.
9. there is a trend towards replacing single family dwellings with multifamily homes. frequently this entails cutting down trees on the lot to make room for the larger multifamily dwelling. this has a negative impact on health and the economy. preservation of large trees should be part of the permitting process for construction permits.

clark county should dramatically increase its efforts at planting neighborhood trees, and protect habitat corridors and green spaces:

1. longitudinal studies have found that planting of trees results in a decrease of non-accidental, cardiovascular, lower-respiratory , and accidental mortality. these studies were performed in portland, oregon, so they certainly pertain to the situation in clark county.

the dose-response association between tree planting and non-accidental mortality increased in magnitude as the trees aged and grew. each tree planted in the preceding 1-5 years was associated with a mortality rate of -0.154, whereas each tree planted in the last 6-10 and 11-15 years was associated with a reduction in mortality rate of -0.262 and -0.306 respectively.

the study estimated that planting a tree in each of portland's 140 census tracts would generate $14.2million in annual benefits. in contrast, the annual cost of maintaining those 140 trees would be under $13,720. this results in a cost savings of over $100,000 per tree planted.
the benefit-cost ratio is 1,727:1. very few other interventions by the county can result in such a huge return in benefits.

https://doi.org/10.1015/j.envint.2022.107609.

2. there is a link between trees and human health:
trees lost from the emerald ash borer,which poses no direct threat to humans, but killed more than 100million trees in the united states, was associated with an additional 15,000 deaths from cardiovascular disease and an additional 6,000 deaths from lower respiratory disease. deaths occurred at higher rates in wealthier counties, where more trees are typically found in urban areas.

usda forest service science findings, issue 158, jan/feb 2014, pacific nw research station.

3. there is a positive association between urban trees and birth outcomes:
study location: portland, oregon.
greater tree canopy cover within 50 meters of the mother's house was associated with a reduced risk of having an underweight baby. exposure to the natural environment reduces stress levels, which may be the source of improved birth outcomes.
houses fronted with more street trees experienced lower crime rates, as did houses with large yard trees.

usda forest service science findings, issue 137, nov 2011, pacific nw research station.

4. street trees increase home prices by $8,870 in portland, oregon and a neighborhood tree growing along the public right-of-way added and average of $12,828 to the combined value of all the houses within 100 feet.
shade trees reduce household energy use by an average of $25.16/month in summertime, in sacramento, california.

usda forest service science findings, issue 126, sept 2010, pacific nw research station.