From:	Brandi C
To:	Sue Marshall
Cc:	Michelle Belkot; Wil Fuentes; Matt Little; Glen Yung; Cnty 2025 Comp Plan; karissa.halstrom@hotmail.com
Subject:	Re: Comp Plan Hearing Coalition Comment including 17 community organizations
Date:	Thursday, October 1, 2026 11:13:19 AM

Thank you, Chair Marshall, and all of the Councilors for thoughtfully considering our coalition comment.

I just want to pass along this **important note from Tim T. of Futurewise** that we received this morning and **our coalition would like to echo**:
*"Because the county has adequate capacity in the UGAs and the supplemental ask is for more affordable housing, **I do not think the county needs to delay the adoption of the comprehensive plan. They can adopt the plan, do the supplemental, and then do some upzones afterward.** So Futurewise is certainly not requesting any delays."*

We kindly request that if the Council plans to complete an SEIS to eliminate (or greatly reduce) UGB expansion and de-designation of ag land, that they are very clear about that during the Hearing. As a reminder, most of our coalition are not lawyers or land use experts. **Having reassurance in plain language would be appreciated by all.**

Thank you again, so much, for your time and consideration!
Brandi Cole
Karissa Halstrom

Sent with Proton Mail secure email.

On Thursday, October 1st, 2026 at 10:22 AM, Sue Marshall <Sue.Marshall@clark.wa.gov> wrote:

> Thank you.
>
> Sue
>
> Get Outlook for iOS
>
> ---
>
> **From:** Brandi C <brandicole@protonmail.com>
> **Sent:** Wednesday, 30 September 2026 09:30:06
> **To:** Sue Marshall <Sue.Marshall@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>; Matt Little <Matt.Little@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>
> **Cc:** Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>; karissa.halstrom@hotmail.com <karissa.halstrom@hotmail.com>
> **Subject:** Comp Plan Hearing Coalition Comment including 17 community organizations
>
> **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.

Dear Chair Marshall, and Councilors Belkot, Fuentes, Little, and Yung,

We are writing to you again today in collaboration with an even larger **coalition including 17 community organizations and 61 individuals**. We kindly ask that you take the time to thoroughly read the attached comment and **thoughtfully consider not only the requests being made in our comment but who is being represented by our coalition.**

If you have any questions or would like to discuss any aspect of the comment, **please do not hesitate to reach out to us or any of the community organizations directly**.

Thank you,
Brandi Cole
Karissa Halstrom

Sent with Proton Mail secure email.

September 30, 2026

Clark County Council
PO Box 5000
Vancouver, WA 98666

Dear **Chair Marshall**, and **Councilors Belkot, Fuentes, Little, and Yung**,

We are writing to you again in collaboration as a coalition of 61 individuals and 17 organizations including: iUrban Teen, WSU Vancouver Environmental Science Club, Southwest Washington Equity Coalition, Fourth Plain Forward, Southwest Washington LULAC, Vancouver Metro LULAC Council 47026, Vietnamese Community of Clark County, Hispanic Disability Support SWWA (Pasitos Gigantes), Pacific Islander Community Association of WA (PICAWA), SW WA Victory Food Project, Western Institute for Agriculture and Food Security Foundation, Columbia Riverkeeper, Vancouver Audubon Society, Sierra Club Loowit Group, Cycle Vancouver, Alliance for Community Engagement (ACE), and Green Party of Southwest Washington.

We are writing to **strongly urge you to adopt greenhouse gas (GHG) emissions reduction targets aligned with the City of Vancouver's reduction targets and to draft a supplemental EIS that creates a viable alternative through appropriate up-zoning** that limits urban growth boundary (UGB) expansion and protects agricultural resource lands in the 2025 Clark County Comprehensive Plan Update (Comp Plan Update).

1. **Align greenhouse gas (GHG) emissions reduction targets with the City of Vancouver's reduction targets.**

According to Community Planning staff, the currently proposed GHG emissions reduction targets for unincorporated Clark County within the Comp Plan Update Climate Element Draft are insufficient and create risk in meeting the statewide 2050 target established in RCW 70A.45.020. Unincorporated Clark County and the City of Vancouver account for 84% of Clark County GHG emissions, 40% and 44% respectively. Adopting the City of Vancouver's targets of 80% reduction in GHG emissions by 2030 and carbon neutrality by 2040 would align with the responses of a majority of the Clark County Climate Advisory Group and reflect the bold leadership and sense of urgency necessary to address our rapidly accelerating climate emergency.

As noted by staff, a significant portion of Clark County GHG emissions are produced by sources like transportation (36% of total emissions) and agriculture and tree loss (21%) which are out of County control. We strongly agree that establishing more ambitious reduction targets could create the necessary sense of urgency and innovation while allowing more time to adapt further if the County falls short of interim goals. Additionally, by adopting reduction targets aligned with the City of Vancouver, the County could model strong leadership on addressing climate change as Washougal, Ridgefield, and Camas--which has a high 2022 GHG emissions baseline--align on their own reduction targets in the near future. As a reminder, there is no penalty for missing more ambitious targets. However, Clark County has the opportunity to work alongside the City of Vancouver in reducing our carbon footprint and providing environmental and public health benefits for the majority of residents sooner.

2. **No expansion of UGBs or de-designation of agricultural resource lands.**

Additionally, we would like to echo the sentiment of the majority of prior written public comment and verbal testimony for the Preferred Alternative hearing in April, and FutureWise's public

comment dated July 30, 2026, regarding the expansion of UGBs and de-designation of agricultural resource lands protected by the Growth Management Act. Reducing urban sprawl by accommodating projected housing and employment targets within existing urban growth areas through appropriate up-zoning and development could help reduce vehicle miles traveled and associated GHG emissions. Additionally, we strongly believe that in order to meet the goal of "promot[ing] holistic and resilient food economies" to expand local food security as stated in the Chapter 14 Climate Element draft, legally protected agricultural resource lands should not be de-designated. As accelerating climate change increases surface air temperatures, the frequency of extreme weather events, and threatens crop yields and the stability of the global food system, our reliance on our local food system will become more important than ever. As it was stated in public testimony at the Preferred Alternative Hearing, "we cannot eat concrete."

We would also like to specifically highlight the Washington Department of Commerce's recent letter to the Council dated September 22nd, 2026, which reinforces our understanding that **the Vacant Buildable Lands Model indicates that the current UGBs are sufficient to accommodate projected growth**. Additionally, we agree with Commerce that the County has not clearly identified "insufficient capacity for housing needs, document[ed] how they have evaluated zoning changes to accommodate deficits in housing capacity, and then document[ed] sufficient capacity with any UGA changes after these previous steps." Regarding a Transfer of Development Rights Program (Policy 1.1.24), Commerce is clear that "TDR programs are not intended to be used as a mechanism to expand UGA Boundaries." We also strongly believe that TDRs should not be used to facilitate the de-designation and destruction of protected agricultural lands. Additionally, TDRs should not be used to essentially leverage a loophole to designate and transfer development rights of lands that should have already been designated and protected based on the 2025 Clark County Agricultural Lands Study. Further, Commerce is clear that the de-designation of agricultural resource lands has "historically has not been found to be defensible by the Growth Management Hearings Board."

3. **Draft a supplemental EIS with appropriate up-zoning to accommodate housing and employment targets.**

We are again urging you to do the right thing and call for a supplemental EIS (WAC 197-11-405) leveraging the Vacant Buildable Lands Model data to create a viable alternative with appropriate up-zoning that omits or greatly reduces UGB expansion, ideally eliminating the de-designation of valuable agricultural resource lands which are protected by the Growth Management Act and critical to safeguarding our local food system.

To be clear, we are not anti-development. We are simply calling for appropriate and responsible development, aligned with the intent of, and in compliance with, the Growth Management Act. Clark County is a beautiful place blessed with abundant resources including prime soils for farming. We are confident that our County leaders are capable of drafting an alternative and Comp Plan Update that will accommodate the need for housing and employing new neighbors while also protecting our resources and food security.

It is not too late. Will you join us in protecting Clark County?

We are writing to you today because we believe in democracy and your commitment as elected representatives of the people to not only listen to our community but act on our behalf. Our community is clearly expressing that **we do not consent to a bare minimum approach to climate action, expansion of urban growth areas and increasing urban sprawl, and the destruction of our precious agricultural resource lands and jeopardization of our future food security--for ourselves, our children, and future generations.** While we recognize that our level of climate concern may be different than yours, we would like to remind you that our

youth are growing up in a vastly different world. Climate anxiety among youth is a significant and growing concern and can be seen in kids as young as three years old. Committing to bold climate action and protecting our resources and food security is in service of our children's and future generation's physical and mental health. Therefore, we are urging you to stand with us--not only as our elected representatives and fellow Clark County residents and neighbors--but also as fellow parents, grandparents, aunts, uncles. Your decision in this moment will impact generations to come. Let's act together as responsible stewards of our community and this land to protect them for future generations.

We, the undersigned 17 organizations and 61 individuals, strongly urge Clark County Council to adopt greenhouse gas emissions reduction targets aligned with the City of Vancouver and to draft a supplemental EIS that creates a viable alternative that limits urban growth boundary (UGB) expansion and protect agricultural resource lands in the 2025 Clark County Comprehensive Plan Update. We appreciate your thoughtful consideration of this matter.

Brandi Cole, District 2

Karissa Halstrom-Page, District 4

Green Party of Southwest Washington

Southwest Washington Equity Coalition

Southwest Washington LULAC

Vietnamese Community of Clark County

Hispanic Disability Support SWWA (Pasitos Gigantes)

Sierra Club Loowit Group

Western Institute for Agriculture and Food Security Foundation

Pacific Islander Community Association of WA (PICAWA)

iUrban Teen

Vancouver Metro LULAC Council 47026

Columbia Riverkeeper

Vancouver Audubon Society

Tonya Enger, District 1

Alli Marie de Hoog, District 4

SW WA Victory Food Project

Hector Hinojosa, District 1

Don Steinke, District 4, Climate Community Advisory Group (CAG)

Fourth Plain Forward

Hannah Taylor, District 3

Peter Fels, District 1

Crossland Kapaun, District 3

Tina Barrows, District 3

Emily Crowe, District 1

Monica Zazueta Tabor, District 1, Climate Community Advisory Group (CAG)

Cyndi Ellis, District 2

Alliance for Community Engagement (ACE)

Cathryn Chudy, District 1

Samantha Guse, District 2

Alex Luna, District 1

Matthew Thogerson, District 1

Rowen Oaks, District 1

Jim Byrne, District 5

Kate Dulemba, District 1

Cycle Vancouver

Jan Verrinder, District 1

Teresa Hardy, District 3

Mary Goody, District 3

Leah Perkel

Steve Perkel

Scott Reed, District 1

Carrie Parks, District 4

Albert O'Connor, District 4

Mattie Hevelone, District 3

Ann Foster, District 5, Climate Community Advisory Group (CAG)

Sunrise O'Mahoney, District 1, Climate Community Advisory Group (CAG)

Janet Hedgepath, District 1

Kellen Moody, District 1

Emily Malaga Thompson

Joseph Skalicky

Emily Borden, District 3

Alona Steinke, District 4

Gary Akizuki, District 4

Patti Reynolds, District 4

Sandra Taylor

Ann P. Shaw, District 4

Kim Harless Felix, District 2

John Zingale, District 2

Sandra Taylor

Susan Galaviz

Robin Ann Starzman, District 2

Dr. Serena Donnelly, District 4

Nancy Helget

Mona McNeil

Marjorie Millner

Lehman Holder

Lynn Stiglich, District 2

Gail Sears, District 2

Sheree Fitzpatrick, District 2

John Bruce Liles

M. Kristin Price

Sharon Bucher Clark, District 5

Richard Kolber

Terri Niles

Suzan Heglin, District 3

Lauren Drake

WSU Vancouver Environmental Science Club