**From:** Cnty 2025 Comp Plan
**To:** Red Walter; Cnty 2025 Comp Plan
**Cc:** Rebecca Messinger
**Subject:** RE: October 1st Hearing
**Date:** Wednesday, September 30, 2026 9:55:24 AM
**Attachments:** image001.png
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image004.png

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Good day,

Thank you very much for submitting comments related to the 2025 Comprehensive Plan update.

These will be added to the Comprehensive Plan Index of Record. I am forwarding to Rebecca Messinger from the Council's Office for awareness and to share with the Council.

Best,

**Jeff Delapena**
Program Assistant
COMMUNITY PLANNING

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**From:** Red Walter <rowan.walter@gmail.com>
**Sent:** Tuesday, September 29, 2026 8:31 PM
**To:** Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
**Subject:** October 1st Hearing

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attachments unless you recognize the sender and know the content is safe.

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

Please for the love of GOD quit destroying gorgeous agricultural land for housing that will remain empty and CAR SHOPS. what are you DOING on Mill Plain fr? You think the city is going to benefit from a Lexus store? Whooooo is buying Lexi rn? Enough to make up for the cost of the build AND losing that field? You DO know that natural areas bring health to citizens right, like the ones you want to keep alive so they can keep buying stuff? If we dont have little natural areas, just like the little PC games from our childhoods taught us, your residents will NOT have a happy little green bubble floating above their heads. They will have to go, yes, ELSEWHERE. Even if they dont move homes, they will commute to the nearest square foot patch of grass and give money for businesses in THAT area, which will apparently not be near here.

Also idk if you have anything to do with it but it is whack to get rid of the natural areas on freeway exits. Houseless people need somewhere to go, they will go there anyway. You didnt stop anything other than driver's happiness or bird rests when chopping down the vernal space on exit 28 of 205... imagine being the person to make that decision or vote on it. The lack of logic. Could never be me.

On to the rest...

We are writing to you again in collaboration as a coalition of individuals and organizations including: 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, SW WA Victory Food Project, Fourth Plain Forward, Alliance for Community Engagement (ACE), and Cycle Vancouver. 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).

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.

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.”

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.