From:	Cnty 2025 Comp Plan
To:	Steve Thalberg
Cc:	Rebecca Messinger
Subject:	FW: suggested changes for the Comprehensive Growth Management Plan
Date:	Wednesday, September 30, 2026 1:41:00 PM
Attachments:	^ Environmental Impact Statement.docx trees and health - harvard article 4-19-2024.docx image001.png image002.png image003.png image004.png

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Good day, Steve,

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 add to their record.

Best,

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558

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From: Steve Thalberg <sathalberg@gmail.com>
Sent: Wednesday, September 30, 2026 12:10 PM
To: Sue Marshall <Sue.Marshall@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>; Matt Little <Matt.Little@clark.wa.gov>
Cc: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>

Subject: suggested changes for the Comprehensive Growth Management Plan

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Dear Council,

Here are some specific suggested changes for the Comprehensive Growth Management Plan, that will improve the CGMP:

1. no de-designation of Agricultural lands.
rescind the Council's prior approval of the Urban Growth Boundary enlargements requested by the cities of Ridgefield, La Center, Yacolt, Battle Ground and Camas, and the de-designation of individual parcels should also be rescinded.
reasoning:
a. the Dept of Commerce has stated that there is adequate lands existing in those cities for housing development.
b. the County has already seen a 38% decrease in farmlands from 2017 to 2022. this trend must be reversed.
c. there are economic, historical, environmental and cultural value of our agricultural lands and natural resources. these are our identity and the draw for people to move to and stay in Clark County. we need to protect this.
d. there is a fiscal and legal responsibility for the county to protect agricultural lands, see the September 2026 Dept. of Commerce letter to the County Council.
e. there are significant legal costs to the county if the county proceeds with actions that may not be consistent with the state's Growth Management Act.

2. recommend adoption of a Public Benefit Rating System (PBRS).
reasoning:
a. this will provide time and incentive for the arrangement of succession planning of farmlands.
b. this will help protect affordable access to farmland for future generations.
c. this will dovetail nicely with HB1181, which encourages tree crown cover, reduction of greenhouse gases, improvement in air and water quality and enhances the quality of life of residents.
d. this will incentivize and encourage the adoption of multiple goals that the county has established in their Growth Management Plan.
e. adoption of a Public Benefit Rating System (PBRS) is even more important now that the Planning Commission seems to have very little concern for the loss of Ag lands.

3. recommend the voluntary designation of agricultural resource lands, if criteria are met.
reasoning:
a. there are many sites in the county with quality soils and small farms that are not in an AG-20 zone category.
b. zoning is the #1 method of protecting agricultural lands.
c. to encourage the conservation of lands for the purposes of agriculture and/or forestry (timber and non-timber goals) and/or wildlife habitat.
d. there are many small specialty farms that produce berries, vegetables, hay, orchard fruits, vineyard grapes, etc., and provide nutrition and income to Clark County residents.

4. recommend that the proximity of urbanization is NOT a valid reason to de-designate farmlands.

reasoning: protecting agricultural lands is the fiscally responsible choice because farming provides perpetual economic return, long-term food security, aligned with the state's Growth Management Act.

5. recommend that new roadways are NOT to be placed across AG-20 zoned agricultural lands, and the proposed road conforms with the state's Comprehensive Growth Plan. Roads that abut AG-20 zoned lands may be improved to meet traffic needs.
reasoning: there is a need to protect AG zoned lands, which are rapidly being lost or de-designated in the county.

6. recommend that property owner must give consent for the conversion of their property from unincorporated Clark County status, into an urban growth boundary.
reasoning: if a property is designated to be within an urban growth boundary, those properties (farms) are pretty much excluded from USDA/NRCS grants, which is to the detriment of those farmers.

7. defer adoption of a TDR (transfer of development rights) until:
a. it conforms to the state's Growth Management Act,
b. it sets a firm deadline to establish a TDR plan for the county,
c. Agricultural lands in the county are preserved in a 1:1 ratio for Ag acreage de-designated:TDR for Ag acreage,
d. no de-designation of Agricultural acreage will occur unless a TDR has been first adopted and enacted.
reasoning:
a. the County has already seen a 38% decrease in farmlands from 2017 to 2022. this trend must not continue.
b. the promise to adopt a TDR may not occur with a future County Council, and any de-designation of Agricultural lands that occur with the County's proposed Growth Management Plan may not be adequately compensated.
c. the adoption of the Planning Commission's TDR proposal is a death sentence for agriculture in the county: Development will run rampant and unchecked.

8. chapter 3: Rural and Natural Resource Element:
add 3.0.2.1, 3.1.5.1, 3.4.5.1, 3.5.6.1: "Recommendation for the adoption of a Public Benefit Rating System (PBRS), as this will promote enactment of the policies in this chapter."
reasoning: a PBRS supports agricultural lands, rewards quality soils, supports agriculture, forestry and mining activities, promotes environmental quality (wildlife, wetlands, riparian zones), and promotes the historic character and cultural resources in the community.

9. chapter 3: Rural and Natural Resource Element:
delete 3.5.3, as cluster developments erode agricultural lands, and are a step towards urbanization of agricultural lands.
reasoning: cluster developments occur in rural and/or resource lands. an example: a 40 acre lot is allowed to subdivide with 65% to 75% remaining in rural zoning and rest to convert to 1 acre lots. homes are built on those 1 acre lots and the remaining land usually sits empty, as there is no requirement for it to continue with agricultural or resource level activity, and thus becomes a field of weeds. there is then the argument that local houses on the 1 acre lot should result in urbanization of the remaining 85% of the land.

9a. remove the Clark County code that allows cluster developments in AG zoned lands. (https://clark.wa.gov/community-development/cluster-developments-pld).
reasoning: see above.

10. chapter 4: Environment Element:
add 4.2.6.1, 4.2.8.1, 4.3.1.1, 4.4.4, 4.5.3.1, 4.10.2.1, 1st, 4th and 11th bullet points under 'strategies': "Recommendation for the adoption of a Public Benefit Rating System (PBRS), as this will promote

enactment of the policies in this chapter."

reasoning: a PBRS supports the use of nw native plants in critical areas, habitats, wetlands, habitat connectivity, habitat recovery, fish friendly waters, and species recovery.

10a. modify the 7th bullet point under 'strategies': change "Investigate" to "Implement" the use of a Public Benefit Rating System of property taxation to encourage development, recording and implementation of Stewardship Plans on parcels essential to salmon recovery or other watershed processes.

reasoning: "Investigation" doesn't improve the status, "Implementation" does.

11. chapter 5: Transportation:
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.

reasoning: if concurrency has not met satisfactory criteria, altering the definition of concurrency criteria would only worsen traffic without improving infrastructure.

reasoning: HB 1181 added climate change and resiliency as a new mandatory element, by adding compliance with concurrency (to avoid excess CO2 emissions).

12. chapter 7: Parks Element:
add 7.1.1.1, 7.1.4.1, 7.3.2.1, 7.3.3.1, 7.4.3.1, 7.6.3.1, 7.7.3.1, 7.9.2.1, volunteer programs under 'strategies' : "Recommendation for the adoption of a Public Benefit Rating System (PBRS), as this will promote enactment of the policies in this chapter."

reasoning:

a. a PBRS would encourage citizen partnerships to improve the quality and number of parks, scenic areas, trail connections, recreational opportunities, and historic/cultural resources, while reducing the county's financial burden.

b. CMP already recognizes that trail use represents the highest known level of participation for public outdoor recreation across the county.

c. Tree canopy coverage – unincorporated urban growth areas have 28% of the land with existing canopy and a potential for an additional 33% of the land for plantings.

13. chapter 8: Historic, Archaeological and Cultural 3 Preservation Element:
add 8.1.6.1, 8.2.5.1, 8.4.2.1, last bullet point under 'strategies': "Recommendation for the adoption of a Public Benefit Rating System (PBRS), as this will promote enactment of the policies in this chapter."

reasoning: a PBRS would promote, via incentives, the preservation, restoration, rehabilitation and reuse of historically or architecturally significant older buildings.

14. chapter 14: Climate Element:
add 14.5.2.1, 14.9.3.1, 14.9.5.1, 14.10.5.1: "Recommendation for the adoption of a Public Benefit Rating System (PBRS), as this will promote enactment of the policies in this chapter."

reasoning:

a. a PBRS would promote compliance with HB1181 by preserving existing agriculture, incentivize tree planting, expanding educational awareness of the value of trees, natural areas and health.

b. HB1181 also added climate change and resiliency as a new mandatory element, by adding crown cover and compliance with concurrency (to avoid excess CO2 emissions).

14a. add 14.9.2.1: "Recommendation for the adoption of a Public Benefit Rating System (PBRS), as this will promote enactment of the policies in this chapter."

reasoning:

a. add tree crown cover will decrease tree loss from development and provide health, climate resilience, carbon sequestration and ecosystem benefits.

b. see attached documents for health benefits of tree crown cover.

15. Appendix A: the I-5 exit 11 westbound connector towards Ridgefield is included in the current 20-year CGMP. For some unknown reason, this project was removed from the proposed 20-year CGMP.
reinsert the I-5 exit 11 westbound connector towards Ridgefield in the proposed CGMP.
reasoning:

a. Ridgefield is the fastest growing area in the county, and the I-5 interchanges at pioneer street and at 179th street are at capacity or are over-capacity.

b. the City of Ridgefield has this project in their 6-year and 20-year plans, and the Ridgefield GMP should be in line with the county's GMP.

16. Arterial atlas:
at one point, the I-5 exit 11 westbound connector towards Ridgefield was taken out of the Arterial Atlas.
ensure the I-5 exit 11 westbound connector towards Ridgefield is in the Arterial Atlas, as depicted in the Ridgefield plans.
reasoning: Ridgefield's revised map can be found at:
https://ridgefieldwa.us/DocumentCenter/View/3041/2025-2030-TransportationImprovement-Program-Map-PDF
The I-5 exit 11 connector to Ridgefield is depicted as a blue dotted ellipse, and the specific route in that ellipse has not yet been determined. This ellipse also included improvements of Carty Rd.
The county's plan and Ridgefield's plan for this project should coincide.

Thank you for your work on the CGMP. It is quite an undertaking.

Sincerely,
steve thalberg

Environmental Impact Statement (**EIS**) portion of the Clark County Comp Growth Management Plan (**CGMP**).

With the passage of HB 1181 during the 2023 Washington state legislative session, Clark County is now required to add a Climate Change Element to its Comprehensive Plan by December 31, 2025.

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 EIS, nor in the CGMP 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.

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2. There is a link between trees and human health:
Trees lost from the emerald ash borer, which poses no direct threat to humans, 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.

Clark County's revised CGMP should reflect the above concerns and the County should encourage compliance with the above (by educational outreach, volunteer opportunities, coaching opportunities, code and ordinances, grants, credits, and/or other incentives).

Respectively submitted,
Steve Thalberg, MD.

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https://www.health.harvard.edu/blog/how-do-trees-and-green-spaces-enhance-our-health-202404193034

How do trees and green spaces enhance our health?

Trees help prevent flooding, release oxygen, reduce pollution, and boost both health and mood.

April 19, 2024

By Wynne Armand, MD

Trees enhance life in a multitude of ways. They combat climate change by reducing greenhouse gases in the atmosphere. They muffle sound pollution and reduce air pollution, drawing in carbon dioxide and releasing oxygen. When rain pours from the skies, trees decrease stormwater runoff, preventing flooding and soil erosion. They also provide valuable habitats to support biodiversity in insects, birds, and other animals, and microorganisms. The list goes on.

Equally important is accumulating evidence that simply spending time around trees and green spaces uplifts our health and mood. Below are a few of the biggest benefits we reap.

Keeping it cool: Trees help prevent heat-related illness

Climate change is causing rising temperatures and more heat waves across the US. These effects are worse for those who live in neighborhoods known as urban heat islands [https://www.epa.gov/heatislands/what-are-heat-islands], where asphalt and concrete soak up heat during the day and continue to radiate it at night. Temperatures can reach 7° F hotter than suburban, rural, or simply wealthier and leafier neighborhoods. Trees and their leafy canopy provide shade that helps to prevent urban heat islands. What does that mean for individuals? It translates to fewer heat-related health illnesses [https://www.health.harvard.edu/blog/extreme-heat-staying-safe-if-you-have-health-issues-202108062563]. which strike outdoor workers and younger, older, and medically vulnerable people more often. A study [https://pubmed.ncbi.nlm.nih.gov/36736334/] published in *The Lancet* calculated that increasing tree canopy to 30% coverage in 93 European cities could prevent an estimated four in 10 premature heat-related deaths in adults in those cities.

How trees help children: Better mood, behavior, attention, and more

Spending more time in nature has been linked with better health outcomes like lower blood pressure, better sleep, and improvement in many chronic conditions in adults. These findings are prompting a growing interest in forest therapy [https://www.health.harvard.edu/blog/can-forest-therapy-enhance-health-and-well-being-2020052919948], a guided outdoor healing practice that leads to overall improved well-being. But what's also remarkable are the varied benefits of trees and nature for children.

One study [https://pmc.ncbi.nlm.nih.gov/articles/PMC8885429/] of children 4 to 6 years old found that those who lived close to green space demonstrated less hyperactive behavior and scored more highly on attention and visual memory testing measures compared with children who did not.

Just *seeing* trees can have mental health benefits. In Michigan, a study [https://pmc.ncbi.nlm.nih.gov/articles/PMC10177887/] of children between the ages of 7 and 9 demonstrated that students who could see trees from their school windows had fewer behavioral problems than those with limited views.

In Finland, researchers modified daycare outdoor playscape environments [https://pmc.ncbi.nlm.nih.gov/articles/PMC7556828/] to mimic the forest undergrowth. These daycares were compared to control standard daycares and nature-oriented daycares where children made daily visits to nearby forests. At the end of 28 days, the children in the daycares with modified forest undergrowth playscapes harbored a healthier microbiome and had improved markers of their immune systems as compared to their counterparts.

How green space helps communities

Having green space in neighborhoods also does a lot to enrich the well-being of communities. A randomized trial in a US city [https://pmc.ncbi.nlm.nih.gov/articles/PMC5866574/] planted and maintained grass and trees in previously vacant lots. Researchers then compared these green spaces to lots that were left alone.

In neighborhoods below the poverty line, there was a reduction in crime for areas with greened lots compared to untouched vacant lots. Meanwhile, residents who lived near lots that were greened reported feeling safer and increased their use of the outside space for relaxing and socializing.

How can you help?

Unfortunately, urban tree canopy cover has been declining over the years. To counter this decline, many towns and nonprofit organizations have programs that provide trees for planting.

A few examples in Massachusetts are Canopy Crew [https://www.greencambridge.org/canopycrew] in Cambridge and Speak for the Trees [https://treeboston.org/] in Boston. (Speak for the Trees also offers helpful information on selecting and caring for trees [https://treeboston.org/get-involved/resource/]). Neighborhood Forest [https://www.neighborhoodforest.org/] provides trees for schools and other youth organizations across the US. Look for a program near you!

Planting trees native to your region will better suit the local conditions, wildlife, and ecosystem. Contact your regional Native Plant Society [https://www.fs.usda.gov/managing-land/wildflowers/links] for more information and guidance. If you are worried about seasonal allergies [https://www.health.harvard.edu/blog/save-the-trees-prevent-the-sneeze-2019091017666] from tree pollen, many tree organizations or certified arborists can give you guidance on the best native tree selections.

If planting trees is not for you but you are interested in contributing to the mission, consider donating to organizations that support reforestation, like The Canopy Project [https://www.earthday.org/campaign/canopy-tree-project/] and the Arbor Day Foundation [https://www.arborday.org/].

Dr. Wynne Armand is a physician at Massachusetts General Hospital (MGH), where she provides primary care; an assistant professor in medicine at Harvard Medical School; associate director of the MGH Center for the Environment and Health [https://www.massgeneral.org/environment-and-health]; and affiliated faculty, Harvard Chan Center for Climate, Health, and Global environment (C-CHANGE).