From: publiccomment
To: allencasey87@gmail.com
Subject: FW: Council Hearing Public Comment
Date: Wednesday, September 30, 2026 8:59:00 AM
Attachments: image001.png

Hello, Allen –

This is to confirm receipt of your comments, which have been shared with the Council and added to the record of Oct. 1.

Thank you,
Rebecca



Rebecca Messinger
Clerk to the Council
COUNTY MANAGER'S OFFICE

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From: Clark County <webmaster@clark.wa.gov>
Sent: Wednesday, September 30, 2026 8:47 AM
To: publiccomment <publiccomment@clark.wa.gov>
Subject: Council Hearing Public Comment

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Submitted on Wed, 09/30/2026 - 8:46 AM

Name
Allen Casey

Phone Number

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Email Address
allencasey87@gmail.com

Subject
Comprehensive Plan Final Adoption Hearing

Date of Hearing
Thu, 10/01/2026

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

I am a Vancouver Washington resident and I strongly suggest that you consider the following for the comprehensive plan.

1) Align greenhouse gas (GHG) emissions reduction targets with the City of Vancouver's reduction targets.
2) No expansion of UGBs or de-designation of agricultural resource lands.
3) Draft a supplemental EIS with appropriate up-zoning to accommodate housing and employment targets.

There is a large coalition of various individuals and organizations that are also advocating for the considerations 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.

I have provided details for each item below.

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.

Thank you.
Allen C.

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