

Greetings Commissioners,

My name is Peter Bracchi, and I'm here to raise a critical issue regarding Vancouver's stormwater planning and its impacts on Clark County's shared water resources.

The City of Vancouver has chosen not to document or address pollution originating from city-run homeless camps—specifically those along Burnt Bridge Creek—in its Stormwater Management Program Plan. This omission is more than just an oversight. It directly conflicts with the requirements of the City's NPDES Phase II permit, which mandates identifying and managing all sources of pollution affecting our stormwater systems.

By failing to include these known pollution sources, the City jeopardizes its own permit renewal and undermines the credibility and effectiveness of the Burnt Bridge Creek Partnership, a collaborative restoration initiative in which both the City and WA Ecology are invested.

We know these camps generate waste—including gear treated with toxic chemicals like PFAS, human waste, and trash—that leaches into our soils and waterways. This is happening in real time, and yet it's completely unacknowledged in the City's formal stormwater planning documents.

This pollution doesn't stop at city boundaries. It flows downstream, affecting the aquifer recharge zones, recreational water uses, and our long-term public health. PFAS exposure, as many of you know, has been linked to cancers and other chronic illnesses.

Clark County has a right and a responsibility to question whether its partner jurisdictions are fulfilling their legal and environmental obligations.

I urge you to formally recommend that the City of Vancouver revise its Stormwater Plan to include these pollution sources and work collaboratively with county and state agencies on meaningful mitigation.

Let's make sure all pollution is acknowledged—regardless of its source—and that our stormwater strategy reflects the reality on the ground.

The health of our watershed and the integrity of our environmental partnerships depend on it.

Thank you.

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Subject: Public Comment on 2025 Vancouver Stormwater Management Program Plan

From: Peter Bracchi – Vancouver Resident

Email: peterbracchi@aol.com

Date: 5/7/25

Dear Stormwater Program Team and City of Vancouver Officials,
I am submitting this public comment regarding the **2025 Stormwater Management Program Plan (SWMP)**. After reviewing the document ([link](#)), I must express serious concerns about how the City has failed to acknowledge or address two persistent, well-documented, and ongoing sources of stormwater and groundwater pollution:

1. Unregulated On-Street Habitation Near the Men's Share House (Downtown Vancouver)

Over the last eight years, the area surrounding the **Men's Share House in downtown Vancouver** has experienced sustained street-level habitation. These encampments have introduced significant and visible pollution—including **PFAS contamination**, waste runoff, and unsanitary conditions—into nearby stormwater drains and the underlying **Critical Aquifer Recharge Area (CARA)** that spans the city.

Photos and documentation from 2016–2024 illustrate the consistent stormwater violations:

 [Share House stormwater impact photo archive](#)

Despite the **wellhead protection zones** and CARA zoning that legally protect these areas, no portion of the 2025 Plan documents the long-term pollution from this source or provides corrective strategies.

2. Chronic Encampment Along Burnt Bridge Creek (Andresen Safe Stay Area and Vicinity)

Since at least 2016, the **Burnt Bridge Creek corridor**, and particularly in the last 2 years the Andresen Road area, has suffered from sustained environmental degradation due to unsheltered habitation and unauthorized camps. This is a **protected stream**, flanked by environmentally sensitive buffers and CARA-designated land.

- Encampments have led to **tree loss, riparian buffer destruction, solid waste accumulation, fires, PFAS and human waste discharge**.
- Despite these long-term, cumulative effects, the City continues to support the operation of a sanctioned site (Andresen Safe Stay) directly adjacent to the creek. As recently stated by Mayor Anne McEnerny-Ogle, this site will remain indefinitely—until housing for all becomes available.

Photos documenting this degradation over time:

 [Burnt Bridge Creek environmental damage archive](#)


Additional context:

All land along Burnt Bridge Creek within the City of Vancouver is designated as **Critical Area** under Washington State law, and much of it is zoned as **recreational open space**. The area is part of a watershed already listed as impaired under the

federal **303(d)** list.

Despite these designations and impairments, **no SEPA (State Environmental Policy Act) review was conducted** when the City of Vancouver adopted or amended ordinances allowing outdoor habitation, including in Critical Areas. Specifically, no SEPA or SPEA (Stream and Potential Environmental Assessment) analysis has been done for the **Andresen Safe Stay site** or for the encampments near the **Men's Share House**.

As a result, long-term encampments have caused significant degradation: vegetation removal, slope destabilization, fecal matter contamination, fire damage, and increased silting—all within areas protected by the **Growth Management Act (RCW 36.70A)** and local ordinances (e.g., VMC 20.740 and VMC 8.22).

 This represents a clear failure in legal compliance and environmental protection.

3. Failure to Align City Practice with SWMP Goals and Regional Clean Water Projects

The 2025 SWMP outlines goals of:

- Improving stormwater quality,
- Protecting surface and groundwater,
- Complying with Phase II MS4 permit obligations, and
- Supporting habitat and watershed resilience.

Yet none of these goals are supported by on-the-ground actions related to the above pollution sources. The Plan does not mention Share House, Burnt Bridge Creek encampments, or the resulting violations of environmental zoning and water quality protection.

In fact, these environmental problems are also **not addressed in the City's own 2019 Watershed Health Assessment Report**, despite the ongoing nature of the issue:

 [Watershed Health Assessment Report, 2019 \(PDF\)](#).

Moreover, the **Burnt Bridge Creek Partnership** through the WA Department of Ecology outlines ambitious goals for watershed restoration:

 [Burnt Bridge Creek Partnership Plan](#)

This raises a critical trust issue: how can Vancouver be considered a reliable environmental partner when it knowingly omits documentation of long-term, government-sanctioned pollution sites in its formal stormwater strategy?

RECOMMENDATIONS:

I request the following:

1. **Immediate inclusion** of environmental and stormwater impacts from long-term habitation at Share House and Burnt Bridge Creek in the 2025 SWMP.

2. **Initiation of PFAS sampling and human-waste indicator testing** near Share House storm drains and Andresen/Burnt Bridge Creek Safe Stay runoff zones.
3. **Enforcement of CARA and riparian buffer regulations**, with published inspection and enforcement protocols.
4. **Citywide integration of homelessness response with environmental protection policies**, as encampments cannot be treated separately from pollution management.
5. **Full SEPA review** for policies and zoning changes that permit habitation in environmentally protected areas, including retrospective analysis of the impact of outdoor habitation on the Burnt Bridge Creek corridor.

Conclusion:

The city's current policy of tolerating or managing unsheltered habitation within protected environmental zones directly contradicts the stated goals of the Stormwater Management Program. This omission damages public trust, risks non-compliance with NPDES permit obligations, and delays meaningful restoration of our watersheds. Vancouver must correct course—both for legal accountability and for ecological integrity.

Respectfully,

Peter Bracchi

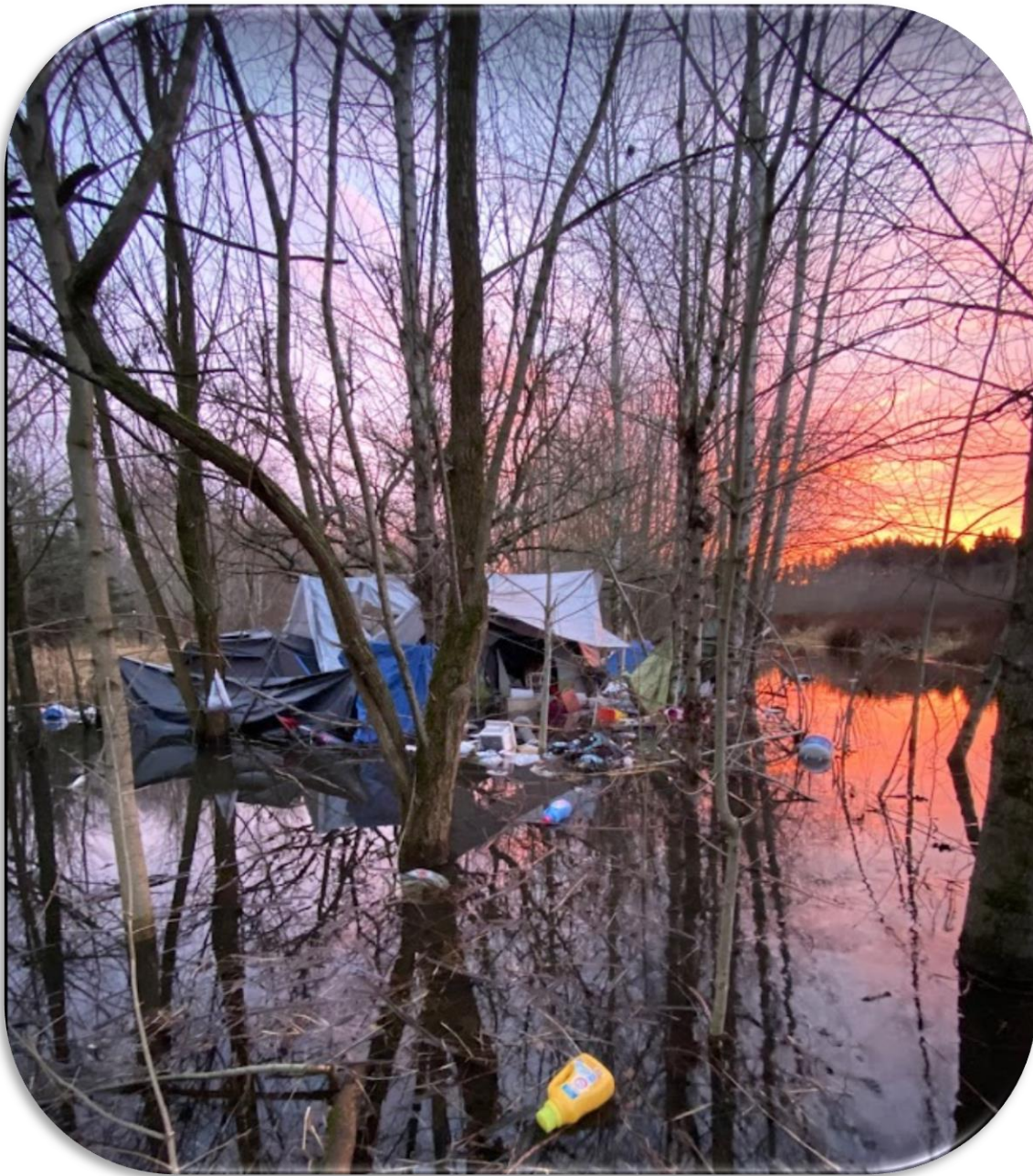
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June 1, 2022

Request

We have a need for a land restoration and water pollution mitigation Plan for the Burnt Bridge Creek Watershed Critical Area.



This document is designed to be viewed Electronically - Titles and Pictures contain Hyperlinks

Environmental Summary

Burnt Bridge is a regulated waterway it does not meet the Washington Department of Ecology standards for fecal coliform bacteria, temperature, acidity, and levels of dissolved oxygen. By not meeting the state standards, it has placed Burnt Bridge Creek on the federal 303(d) list of water quality impaired waterbodies.

The City is failing to bring Burnt Bridge Creek into compliance with state water quality standards.

Along the BBC trail most of the Land in the Critical Area belongs to the City of Vancouver and designated for Recreation. Land Zoning is *Park, Open Space, Greenway, or Lettuce Field*.

The quality of Stream water is related to Land Use Quality and Pollution.

What are Critical Areas

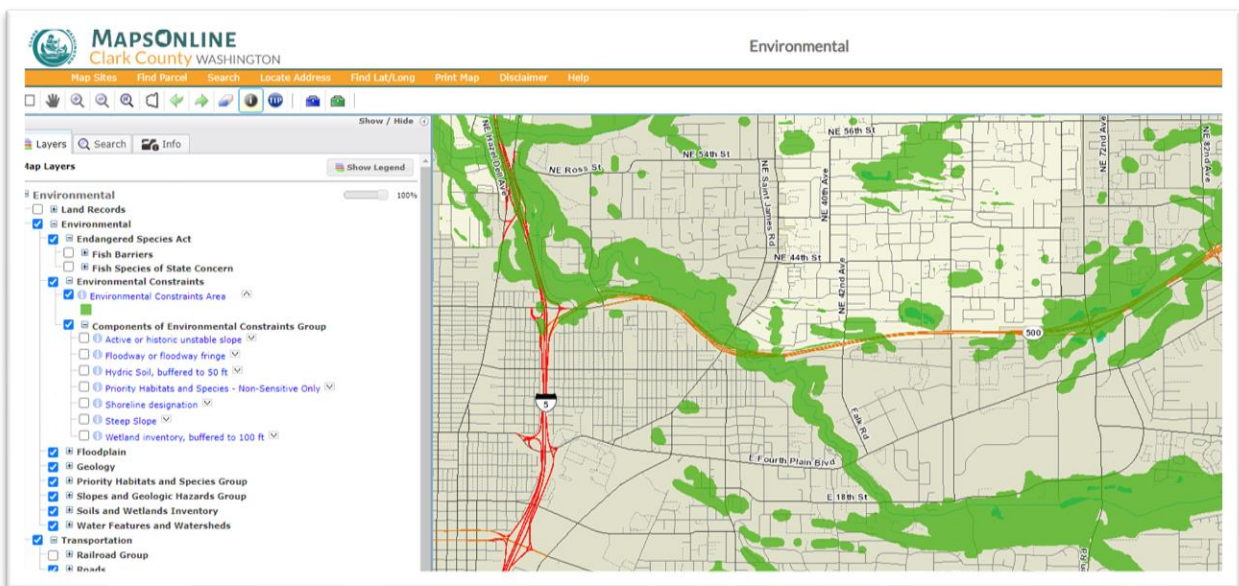
The Growth Management Act (GMA) requires all cities and counties in Washington to adopt regulations protecting “critical areas” in order to preserve the natural environment, wildlife habitats, and sources of fresh drinking water.

Protecting critical areas also helps reduce exposure to risks, such as landslides or flooding, and maintains the natural elements of our landscape. It can be costly, or even impossible, to replace critical area functions and values once they are lost.

RCW 36.70A.030(5) defines five types of critical areas:

- 1) Wetlands
- 2) Frequently flooded areas
- 3) Geologically hazardous areas
- 4) Fish and wildlife habitat conservation areas
- 5) Areas with a critical recharging effect on aquifers used for potable water

Environmental Constraints layer – summary of Items 1-4



Problem Description

The City of Vancouver Failed to perform a **SEPA** study when [Camping Laws](#) were initiated or update. The City has, and still allows camping within the Critical Area.

The [State Environmental Policy Act](#) (SEPA) process identifies and analyzes environmental impacts associated with governmental decisions. These decisions may be related to issuing permits for private projects, constructing public facilities, or adopting regulations, policies, and plans. The SEPA review process helps agency decision-makers, applicants, and the public understand how the entire proposal will affect the environment

By the City failing to perform the required SEPA Study, the result has been Environmental Destruction to the Critical Area with additional Fecal Matter and Water Pollution to the existing 303(d) list stream.

Potentially Harmful Materials from continuous habitation and Fires been a contributing problem. Stream shade has been reduced by the Cutting of Trees. Silting has Increased due to digging, vegetation removal, Tree cutting and habitation on steep slopes.

Critical Area land has had residential occupation for the last 6 years. The land has had the ground cover removed and trees cut down to establish cleared living areas. The result has been years of Environment Devastation, water pollution and increased devastation caused by Fires, and Water Pollution.

The City is failing to meet it Commitment to Clean Water

The City is failing to meet its Commitment to “Not Net Loss” to Critical Areas

The City is failing to enforce it own City Codes for Environmental Protection

15.04	Park Code
15.04.040	Removal or Destruction of Park Property
15.04.100	Depositing Litter
15.04.110	Fires
15.04.150	Closing Hours--Unlawful Entry
8.22	Camping
8.22.040	Unlawful Camping
8.22.050	Unlawful Storage of Personal Property in Public Places
14.26	Water Resources Protection
14.26.115	Prohibits “Municipal Waste Disposal Sites”
14.26.117	Discharges to Water Resources. “Potentially Harmful Materials”
20.740	Critical Areas Protection
20.740.020	General Provisions - No Net Loss of Functions
20.760	Shoreline Management Area

6 Years of Environmental Destruction & Water Pollution to BBC

[Shoreline Destruction and Pollution - East Side](#)



[Shoreline Destruction and Pollution West Side](#)



Frequently Flooded Areas

Bicycle Chop shop Camp. ground compacted, trees cut and Water Pollution



Clark County Geographic Information Services - Environmental Constraints Layer Flood Plain

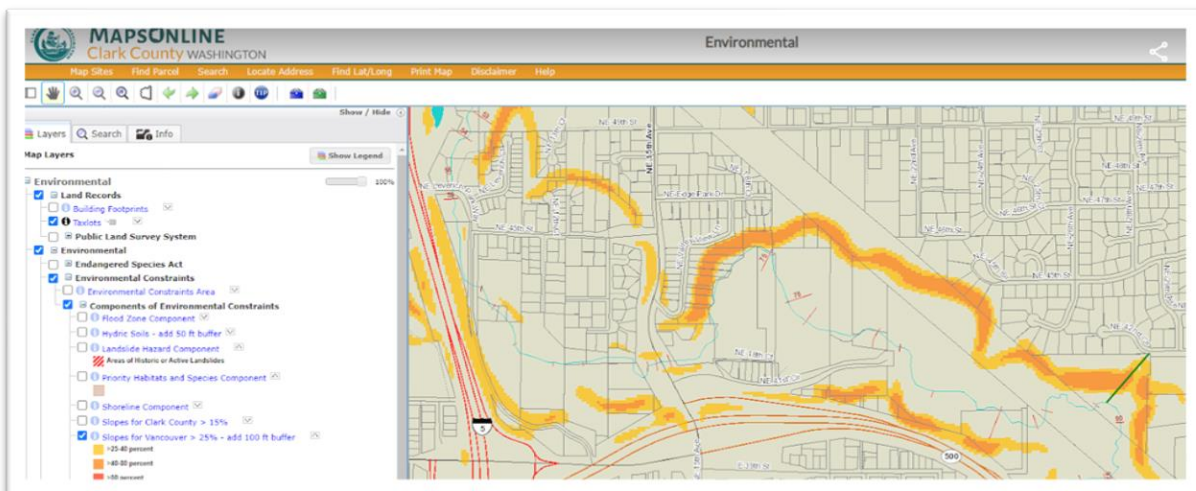


Geologic Hazard Areas 6 Years of Environmental Destruction

Removal of Vegetation causes Erosion on Steep slopes, silting into creek

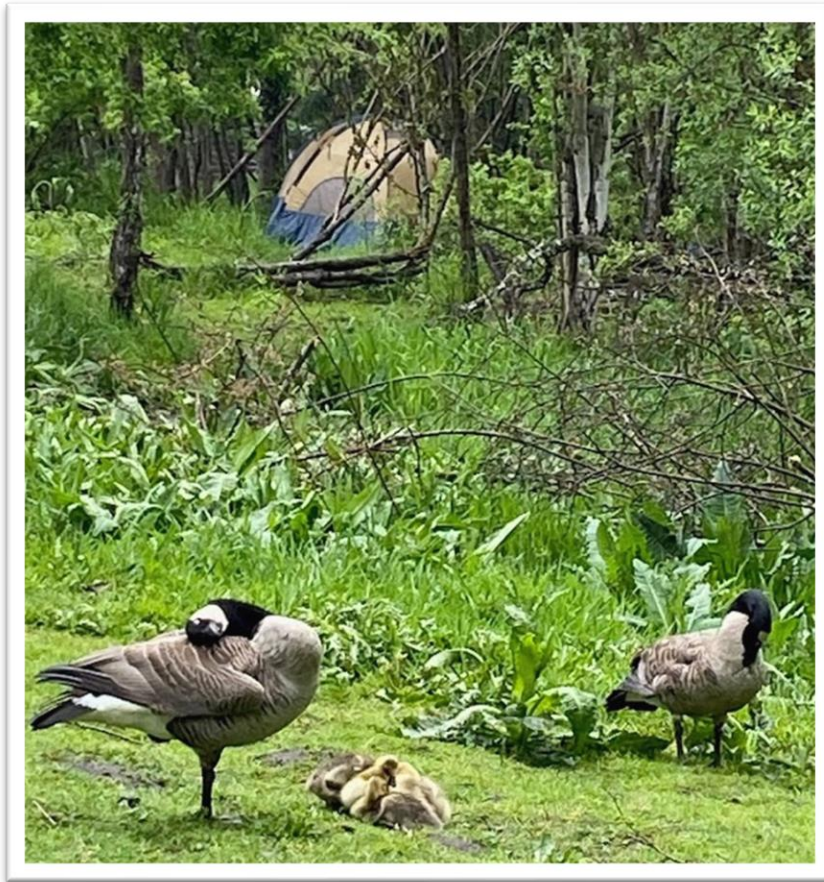


Steep Slopes 40%-80% along Burt Bridge Creek

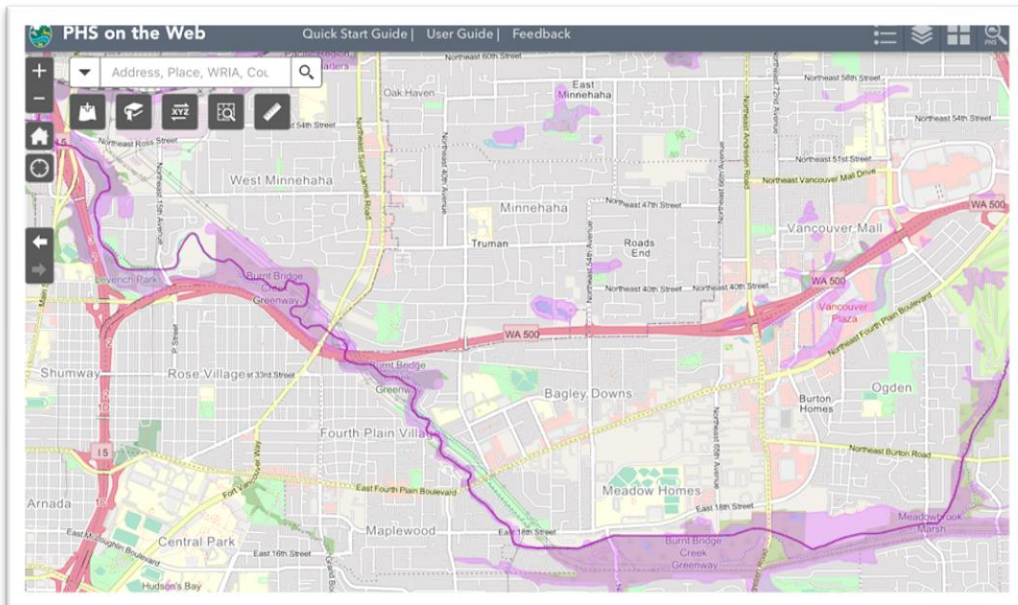


Priority habitat conservation areas over 6 years of Destruction

Priority Habitat Species Area



Map to Priority Habitat Species Area

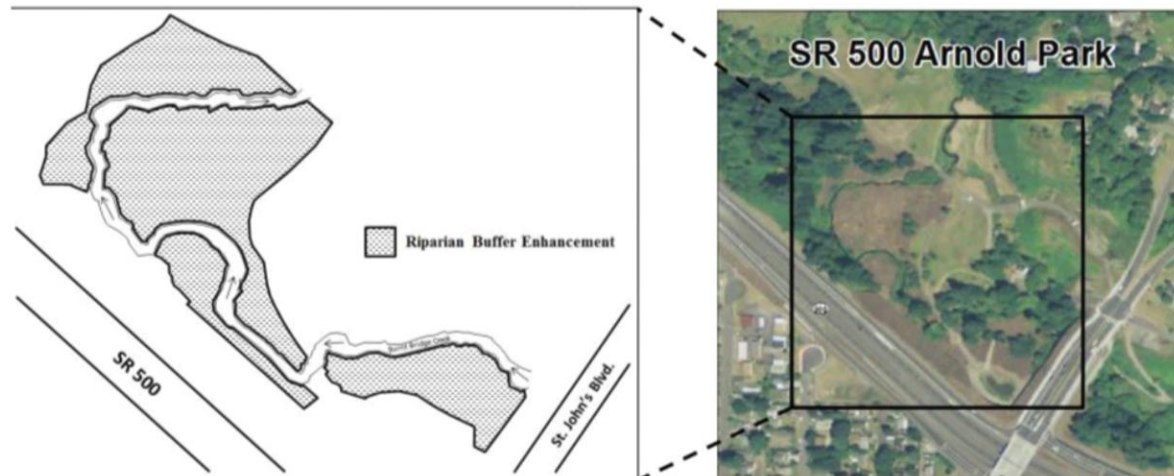


[Arnold Park-Mitigation continuous destruction over 6 years](#)

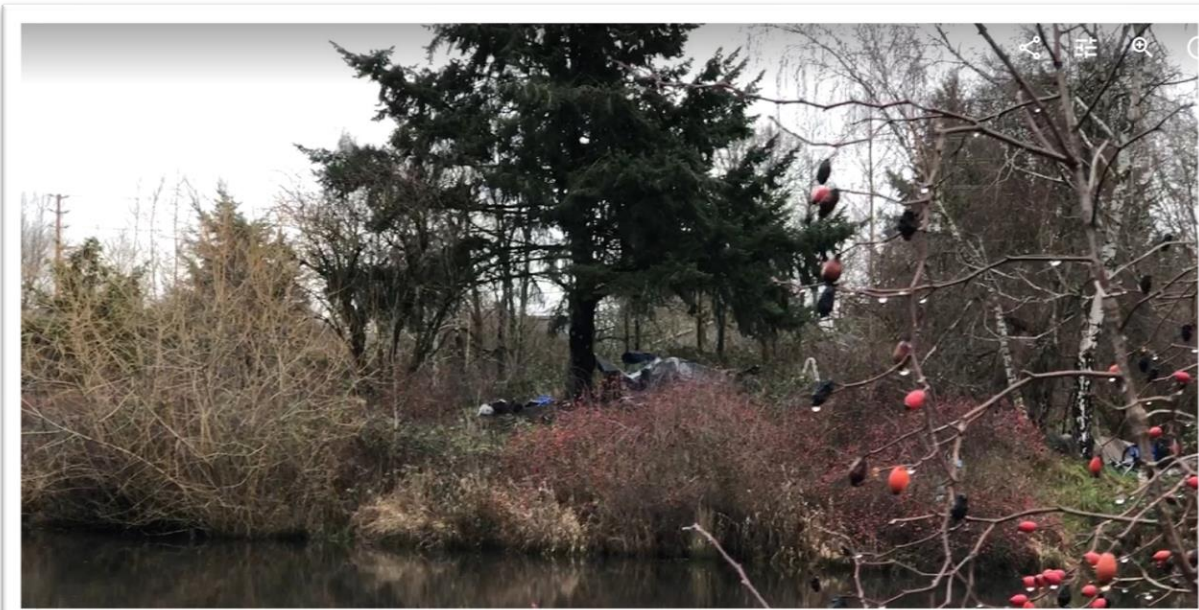
USACE NWP (23) NWS-2009-1104 - Southwest Region Wetlands Program

What is the 500 Arnold Park Mitigation Site?

This 4.42-acre mitigation site (Figure 1) is located along Burnt Bridge Creek west of St. John's Boulevard, north of SR 500, and entirely within Arnold Park. This site was created as partial compensation for impacts to 4.30 acres of disturbed riparian buffer due to mobility and safety improvements within the vicinity of the SR 500 and St. John's Boulevard interchange. The riparian enhancement area is located adjacent to and within the overall project boundaries, and shares the same watershed characteristics as the impacted areas. The site is designed to provide mitigation for lost wetland functions and is anticipated to provide stream shading, flood flow attenuation, water quality, and general habitat functions.



[Meadowbrook Marsh Park Destruction and Pollution](#)

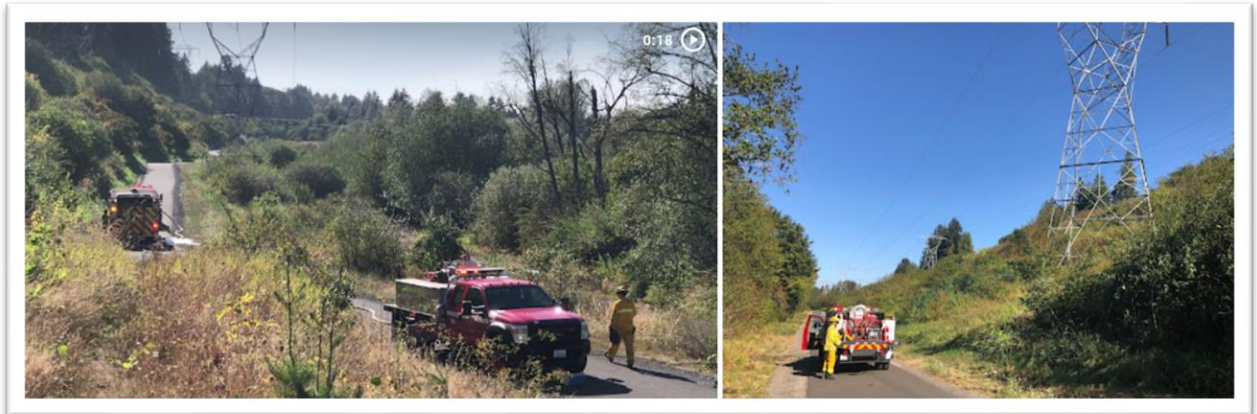


Continous Habitat lissues with FIREs over 6 years

[Fire in Anrold Park Mitigation Site](#)



[Fire in Riparian Area](#)



Continous Habitat Problems with FIREs over 6 years (continued)

SR500 Wetlands Fire - Riparian area



SR500 Wetland Fire Riparian Area & Steep Slopes



Pollution from Potentially Harmful Materials Into BBC over 6 years

Chapter 14.26 WATER RESOURCES PROTECTION

“Potentially Harmful Materials” means hazardous materials as defined at VMC Section 14.26.110 as well as other materials including, but not limited to, the following which, if discharged or improperly disposed, may present a risk to water resources:

Petroleum products including but not limited to petroleum fuel and petroleum-based coating and preserving materials; oils containing PCBs; antifreeze and other liquid automotive products; metals, either in particulate or dissolved form, in concentrations above established regulatory standards; flammable or explosive materials; radioactive material; used batteries; corrosives, acids, alkalis or bases; paints, stains, resins, lacquers or varnishes; degreasers; solvents; construction materials; drain cleaners and other toxic liquid household products; pesticides, herbicides, fungicides or fertilizers unless applied in accordance with local, state and federal standards; steam cleaning and carpet cleaning wastes; pressure cleaning wastes; car wash water; laundry wastewater; soaps, detergents, ammonia; swimming pool backwash; chlorine, bromine, and other disinfectants; heated water; domestic animal wastes; sewage; recreational vehicle waste; animal carcasses, excluding salmonids; food wastes; collected lawn clippings, leaves or branches; trash or debris; silt, sediment or gravel; dyes; and untreated or unapproved wastewater from industrial processes

Potentially Harmful Material Pollution in Critical Area



Additional Fecal Matter pollution over 6 Years

Continuous habitation has contributed additional Fecal Matter into the problem 303(d) Creek that already has problem with Fecal Coliform Bacteria. *(no links to additional pictures provided)*

