

From: [Sonja Wiser](#)
To: [R5 Planning \(DFW\)](#); [Bart Catching](#); [Jose Alvarez](#)
Cc: [Smith, Amaia A \(DFW\)](#)
Subject: RE: Comprehensive Plan Update Site-Specific Review Comment Deadline
Date: Monday, March 18, 2024 10:09:00 AM
Attachments: [Clark County Comp Plan March 2024.pdf](#)

Dear Amaia: Thank you for your comments related to the 2025 Comp Plan & Site Specific Review Update. Your comments have been forwarded to staff and will be added to the 2025 Comp Plan Index of Record. Your name and email have been added to our database to receive future communications related to the 2025 Comp Plan. Please let us know if you have further questions. Thank you.

<https://clark.wa.gov/community-planning/2025-update-public-comment>

From: R5 Planning (DFW) R5.Planning@dfw.wa.gov
Sent: Friday, March 15, 2024 11:16 AM
To: Bart Catching Bart.Catching@clark.wa.gov; Jose Alvarez Jose.Alvarez@clark.wa.gov
Cc: Sonja Wiser Sonja.Wiser@clark.wa.gov; Smith, Amaia A (DFW) Amaia.Smith@dfw.wa.gov
Subject: RE: Comprehensive Plan Update Site-Specific Review Comment Deadline

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.

Hello,

Attached are WDFW's comments on the Clark County Comprehensive Plan and Site-Specific Review update.

Thank you,
WDFW Region 5 Habitat Program

From: Sonja Wiser <Sonja.Wiser@clark.wa.gov>
Sent: Thursday, February 1, 2024 6:57 AM
Subject: Comprehensive Plan Update Site-Specific Review Comment Deadline

External Email

COMPREHENSIVE PLAN UPDATE SITE-SPECIFIC REVIEW COMMENT DEADLINE

News Release from **Clark Co. WA Communications**

Posted on FlashAlert: January 31st, 2024 3:11 PM

Vancouver, Wash. – As part of the 2025 Comprehensive Growth Management Plan update, Clark County Community Planning has been accepting site-specific comprehensive plan and zoning amendment requests. The next phase of the plan update process will be the creation of land use alternatives to be studied as part of the Draft Environmental Impact Statement (DEIS). Site specific requests must be submitted by March 15, 2024, to be included in one of the alternatives to be studied in the DEIS. Site-specific request information and a link to an interactive map showing requests received to date can be viewed here: <https://clark.wa.gov/community-planning/2025-update-site-specific-requests>.

The deadline for submitting site-specific review requests is 5 p.m., Friday, March 15, 2024.

Property owners and other interested parties may continue to submit letters and written comments throughout the periodic comprehensive plan update using the webpage form at: <https://clark.wa.gov/community-planning/comp-plan-comments>. Alternatively, these comments can be submitted by email to comp.plan@clark.wa.gov or in writing to:

Community Planning
Comp Plan Comments
P.O. Box 9810
Vancouver WA 98666

For questions, please contact Community Planning staff listed above.

Contact Info:

Bart Catching, Community Planning, 564.397.4909, bart.catching@clark.wa.gov

Jose Alvarez, Community Planning, 564.397.4898, jose.alvarez@clark.wa.gov

SS



State of Washington
DEPARTMENT OF FISH AND WILDLIFE
Southwest Region 5 • 5525 South 11th St Ridgefield, WA 98642
Telephone: (360) 696-6211 • Fax: (360) 906-6776

March 15, 2024

Clark County Community Planning
P.O. Box 9810
Vancouver WA 98666

To whom it may concern,

Thank you for the opportunity to comment on the **Clark County Comprehensive Plan Update and Site-Specific Review**. The Washington Department of Fish and Wildlife (WDFW) offers the following for your consideration as the Comprehensive Plan continues to develop.

To begin, we want to thank Clark County for their early planning efforts and for engaging WDFW in various working groups. In preparation, we reviewed the 2016 Comprehensive Plan and Environmental Impact State (EIS) to learn how Clark County previously assessed environmental impacts in the previous update. WDFW appreciates that Clark County is evaluating cumulative impacts and recognize that impacts to Priority Habitat and Species (PHS) are regulated under the Fish and Wildlife Habitat Conservation Areas (FWHCA) section of the critical areas ordinance. However, we encourage Clark County to further consider cumulative landscape-level impacts to PHS in the EIS associated with the 2025 Comprehensive Plan update. We actively worked with Clark County in the development of CCC 40.445 Wetland and Fish and Wildlife Habitat Conservation Areas and wrote two letters of support (November 16, 2022 and January 27, 2023) for incorporating our PHS recommendations. WDFW will also offer technical assistance to other jurisdictions within Clark County during their respective critical areas ordinance updates. While these ordinances protect and regulate impacts to PHS, we noted several landscape-level PHS functions that are not well integrated or protected by existing ordinances. These include protecting natural resource lands and reducing habitat fragmentation.

Southwest Washington is experiencing increased rates of population growth. Forestry, agricultural land, and large tracks of undeveloped parcels are being lost as they are integrated into the Urban Growth Area (UGA) and converted to higher density urban use. **WDFW recognizes Clark County must plan to accommodate projected population growth. However, as the county grows, it is essential to consider landscape connectivity, including the value of agricultural and forestry land, during the planning process. This is an opportunity to assess landscape-level ecological functions that aren't well integrated into current ordinances.**

Since the 2016 Comprehensive Plan, WDFW has worked extensively to increase collaboration with cities and counties across the state to emphasize the importance of maintaining habitat connectivity and open space. The Comprehensive Planning process is a framework to address landscape scale concerns, such as habitat connectivity and corridors, that are not well integrated into individual land-use development proposals. Land-use planning can minimize the effects of habitat loss by maintaining large blocks of native habitat and protecting natural corridors - such as river forest corridors and ridgetops - that connect the remaining large habitat blocks. Moreover, while we appreciate Clark County's proactiveness in using the PHS resources for designating FWHCAs, it is important to note that while this mapping tool is an excellent resource for identifying where PHS are located on the landscape, not all habitat characteristics

are mapped. We strongly encourage using the PHS definitions as the basis for evaluating impacts during the 2025 Comprehensive Plan update.

To address these gaps and fully protect FWHCAs in Clark County, we recommend integrating these landscape-level processes into other aspects of the Comprehensive Plan. Below, we provide an overview of key recommendations that, if incorporated into the 2025 Comprehensive Planning process, will help improve the protection and quality of fish and wildlife habitat within Clark County. This is not an exhaustive list, but an outline of emphasis areas to consider.

Protecting Natural Resource Lands

While conservation of fish and wildlife habitat can be accomplished using a variety of site, regional, and landscape incentives and regulations, maintaining existing natural resource lands as viable agricultural and forestry producers is an important consideration. Upzoning land adjacent to existing natural resource lands can complicate a landowner's ability to remain solvent in our economy. For example, upzoning land adjacent to agricultural or forestry to high density zoning risks increasing traffic, pollution, and can create conflicts on a producer's ability to provide their product efficiently and affordably.

One way to help protect natural resource lands is by giving landowners financial incentives to protect these lands from development. For example, one option would be a transfer of development rights (TDR). This was mentioned in the 2016 Comprehensive Plan where the plan mentioned that "Cities could establish a regional program to identify and protect priority habitat areas. This program could include TDR for those cities that do not have such programs, purchase of the land using funds earmarked for that purpose, and property taxation that recognizes the restrictions on development." WDFW is interested in learning the County's plan for implementing a TDR program, and how it could be used to improve protections for natural resource lands.

Additionally, supporting educational programs and providing resources for landowners to implement wildlife-friendly practices, such as wildlife-friendly fencing or native habitat restoration, would be another way to extend the benefits of conservation beyond public lands. This approach would not only promote PHS within these properties, but also promote a culture of shared stewardship and conservation in the community.

While we recognize mining is a type of natural resource lands, it is important to note that this type of land use has considerable negative impacts to FWHCAs in the immediate vicinity. WDFW acknowledges that aggregate mining is a critical component of infrastructure development and understand this resource is needed to meet development demands. However, it is important to consider impacts to FWHCAs when deciding where mining occurs on the landscape. Additional insight on our impact concerns can be found in our previous comment letter, dated April 25th, 2023, in response to the Chelatchie Mine Overlay. We encourage Clark County to further assess landscape-level ecosystem impacts for mining, if such lands are proposed during the Comprehensive Plan.

Reducing Habitat Fragmentation with Open Space Corridors

When assessing land-use alternatives, identifying and maintaining open space corridors will reduce habitat fragmentation and lessen impacts on habitat connectivity. WDFW's biodiversity areas and corridor and habitat connectivity modeling is not currently represented on the PHS webmap but should be considered during the Comprehensive Plan update. Habitat connectivity requires strategic planning that transcends jurisdiction boundaries and is a critical ecological function. Protecting open space corridors from development pressure allow wildlife to move between areas of high value and navigate an urbanizing environment. The Growth Management Act (GMA) requires fully-planning cities and counties establish "open space corridors" within and between UGAs. Furthermore, the GMA guideline for critical

areas encourages “creating a system of fish and wildlife habitat with connections between larger habitat blocks and open spaces.”

Identifying open space corridors, particularly those with lower zoning densities, will allow the county to better evaluate proposed amendments, including changes to Comprehensive Plan and zoning designations and UGA expansions. Additionally, identifying open space corridors will help prioritize areas for acquisition of land for open space, including conservation and recreation. WDFW staff are happy to provide technical assistance in integrating habitat connectivity into the Comprehensive Plan in the absence of it being available on the PHS webmap.

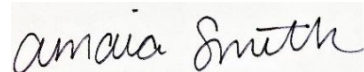
Protecting and Enhancing Urban Green Spaces

While WDFW is supportive of using land within the UGA more efficiently, we want to ensure that Clark County is being proactive in considering how green spaces are being integrated into urban areas. We encourage Clark County to think creatively on how open space can be incorporated into high density areas, such as exploring green roofs or shared open space opportunities. For example, WDFW recently reviewed the Clark County Housing Options Study and Action Plan for the unincorporated Vancouver Urban Growth Area, which states there is a reduction in private open space requirements. While we understand the importance of increasing the number of affordable houses, we need to be careful that these decisions are not contributing to loss of access to nature for low-income households. Additionally, we encourage Clark County to think creatively in how existing infrastructure, like stormwater ponds, can be adapted to provide green spaces for these affordable housing complexes as a dual-purpose solution.

WDFW looks forward to working with Clark County, and the jurisdiction within, in developing comprehensive plans for land management and conservation. The protection of these natural resources will not only benefit our environment but also provide numerous recreational and economic opportunities for the community. WDFW welcomes additional discussion to address questions and is available to offer additional technical assistance.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Amaia Smith". The signature is written in black ink on a light-colored background.

Amaia Smith
Assistant Regional Habitat Program Manager
Washington Department of Fish and Wildlife
5525 S. 11th St.
Ridgefield, WA 98642