

**From:** [Jeffrey Delapena](#)  
**To:** [R5 Planning \(DFW\)](#)  
**Cc:** [Cnty 2025 Comp Plan](#); [Oliver Orjiako](#); [Jose Alvarez](#); [Jenna Kay](#)  
**Subject:** RE: Determination of Significance & Scoping Notice for the 2025 Comp Plan Update  
**Date:** Wednesday, June 5, 2024 4:51:18 PM

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Good day, Brittney,

Thank you for these comments regarding the 2025 EIS Update and Comprehensive Growth Plan. I have forwarded to staff, and will add these to the Index of Record.

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**From:** R5 Planning (DFW) <[R5.Planning@dfw.wa.gov](mailto:R5.Planning@dfw.wa.gov)>  
**Sent:** Wednesday, June 5, 2024 4:45 PM  
**To:** Cnty 2025 Comp Plan <[comp.plan@clark.wa.gov](mailto:comp.plan@clark.wa.gov)>  
**Subject:** RE: Determination of Significance & Scoping Notice for the 2025 Comp Plan Update

**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,

Thank you for the opportunity to comment on the Clark County Determination of Significance & Scoping Notice for the 2025 Comp Plan Update. Attached to this email are WDFW's comments.

I am available for future correspondence and to discuss our recommendations.

Thank you,



**Brittney Salter**  
Environmental Planner 3  
Region 5 Land Use Lead  
WDFW Habitat Program  
(360)-764-6665 \*

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**From:** Sonja Wiser <[Sonja.Wiser@clark.wa.gov](mailto:Sonja.Wiser@clark.wa.gov)>  
**Sent:** Wednesday, May 15, 2024 8:56 AM  
**Subject:** Determination of Significance & Scoping Notice for the 2025 Comp Plan Update

External Email

Greetings,

Attached for your review and consideration, please find a copy of the State Environmental Policy Act Determination of Significance for the Clark County Comprehensive Plan Update 2025-2045 and Request for Comments on the Scope of the Environmental Impact Statement.

Comments are due **by 5:00pm on June 5, 2024**. Details on how to comment are included within the attached document and included below. Thank you!

**Email Comments:** [Comp.plan@clark.wa.gov](mailto:Comp.plan@clark.wa.gov)

**Online Form:** <https://clark.wa.gov/community-planning/comp-plan-comments>



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

June 5<sup>th</sup>, 2024

Comprehensive Plan EIS Scoping  
Clark County Community Planning  
P.O. Box 9810  
Vancouver, WA 98666

Dear Oliver Orjiako:

Thank you for the opportunity to comment on the **Determination of Significance for the Clark County Comprehensive Plan Update 2025-2045 and Request for Comments on the Scope of the Environmental Impact Statement (EIS)**. The Washington Department of Fish and Wildlife (WDFW) offers the following for your consideration.

WDFW submitted comments on March 15, 2024, in response to the Clark County Comprehensive Plan Update and Site-Specific Review. The comments emphasized key considerations for forestry, agricultural land, and large tracks of undeveloped parcels that are at risk for increased impact if integrated into the Urban Growth Areas (UGA) and converted to higher density urban use. While site-specific protection occurs at a later stage in review, considering landscape-scale impacts is essential for long-range planning and provides a more comprehensive and effective approach to sustainable growth and conservation.

WDFW appreciates Clark County's proactiveness in using the Priority Habitats and Species (PHS) mapping for designating the priority habitats in the 2016 alternatives analysis. It is important to note however, that not all PHS are mapped. We strongly encourage using the PHS definitions, as identified in the [PHS List](#), as the basis for evaluating impacts in the 2025 EIS process. **While the fish and wildlife resources identified in the 2016 plan are thorough, WDFW's biodiversity areas, corridors and habitat connectivity modeling are not currently represented on the PHS webmap. WDFW completed habitat connectivity mapping throughout Washington State, including Clark County, and is working on making that information available. This is new information since the 2016 EIS and requires special considerations in the 2025 EIS.** Habitat connectivity requires strategic planning that transcends jurisdiction boundaries and is a critical ecological function. WDFW staff are happy to provide technical assistance, including preliminary mapping information, in

integrating habitat connectivity into the 2025 Comprehensive Plan.

**This letter identifies additional considerations regarding fish and wildlife resource impacts for the 2025 EIS. This information is in addition to the letter submitted on March 15, 2024, which is referenced throughout. We also want to offer further avenues to explore in the mitigation sections for the 2025 EIS for ways to avoid, minimize and even mitigate for these landscape-scale impacts.**

### **Fish and Wildlife Resource Impacts**

The Growth Management Act (GMA) requires local governments to accommodate population growth and protect public resources, including fish and wildlife, from the potential impacts of population growth while assuring no net loss of ecological function. When fish and wildlife habitats are incorporated into UGAs, so are the fish and wildlife that depend on them.

WDFW's guidance document [Landscape Planning For Washington's Wildlife: Managing For Biodiversity In Developing Areas](#) is designed to help local land use and conservation planners consider biodiversity in the planning process.

With the exception of forestry conversions, here are additional considerations that expand upon the concepts in this document which pose threats to fish and wildlife resources:

- **Habitat Fragmentation:** Habitat is at risk of fragmentation with increased development pressure. The GMA requires fully-planning cities and counties to 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.” WDFW recommends identify areas where large, connected patches of native vegetation can be preserved to maintain biodiversity and provide wildlife corridors. Whenever feasible, consider incorporating plans that link urban and rural parks and open spaces to form functional wildlife corridors, which then ultimately can be joined to outlying habitats. The county should evaluate fragmentation risk of critical habitats in the alternatives analysis. See previous comment letter for further information and recommendations for implementation.
- **Riparian Areas:** While connectivity of riparian corridors on a landscape scale is important, protecting these riparian areas at the site scale must also be considered. WDFW's [new riparian management recommendations](#) supports using Site Potential Tree Height of 200 years (SPTH200) to ensure the riparian ecosystem has the greatest functionality. These ecological functions include, but are not limited to stream morphology, erosion and sedimentation process, fish and wildlife habitat availability, wood recruitment, stream temperature, shading, pollutant removal, and nutrient cycling. Not all jurisdictions within Clark County have updated their Critical Areas Ordinance to incorporate WDFW's best available science for riparian habitat. During the alternatives analysis, WDFW recommends evaluating impacts to riparian habitat for jurisdictions that have not incorporated this new science.
- **Road Management:** To accommodate a growing population, infrastructure expansion is required to accommodate the increase in traffic. Roads and traffic affect connectivity by

creating barriers to movement, fragmenting habitat, and can contribute to wildlife mortality by vehicle collisions. WDFW recommends assessing the impact of new roads on terrestrial and aquatic habitat connectivity and for road system expansions to be considered carefully to avoid creating new barriers.

- **Stormwater Management:** As we plan for more growth, we will need to plan for additional stormwater infrastructure. Some jurisdictions have been transparent about their lack of adequate stormwater infrastructure for their current populations. Stormwater systems are an important component of infrastructure to manage runoff. In a study conducted by Tian et al (2021) they linked a chemical found in tires, commonly known as 6PPD-quinone, with decades of stormwater-linked coho mortality events in urban streams in the Pacific Northwest. While their study was focused on coho, they hypothesized that this compound was likely toxic to other aquatic organisms as well. WDFW recommends evaluating the impact of stormwater facilities being constructed in or near critical areas and potential risk of impact to aquatic environments. Regional staff have observed a trend of these facilities being built within riparian areas in many jurisdictions.
- **Forestry Conversion:** Forest practice conversions are becoming more frequent with population growth. As forests are transformed into urban areas, long-term timber production possibilities decrease, and open spaces, habitats and species are lost. The consequences of increased forest practice conversions result in a trend of unplanned urban growth, where housing units are built in or near critical areas.

### **Strategies for Mitigation Sequence**

WDFW recognizes that not all future ecosystem impacts are avoidable. However, we have technical expertise to support local jurisdictions in achieving no net loss of ecosystem functions and values. **The mitigation sequence of impact avoidance, minimization, and mitigation that is used for site-scale projects should be prioritized at the landscape-scale as well.** We commend the county for creating incentive programs to protect wildlife habitat, as a means of mitigating impacts from growth. Here are some additional strategies to incorporate into mitigation sections of the 2025 EIS:

- **Habitat Restoration and Enhancement:** WDFW supports the statement, *“Implementation of restoration projects identified in this plan could help to further restore fish and wildlife habitats, potentially at a larger scale by forming partnerships among jurisdictions, nonprofit organizations, and other entities”*. WDFW recommends identifying degraded or fragmented habitats and critical areas for implementing restoration projects. This could involve planting native vegetation, removing invasive species, and creating wildlife-friendly spaces. Establishing and enhancing buffer zones around critical areas can also be a way to avoid impacts from development. Prioritize the preservation and enhancement of existing wildlife corridors to ensure connectivity between habitats.

- **Wildlife Crossings and Corridors:** The 2016 EIS accurately states, *“Habitats for some migratory species are protected by local critical areas regulations; for example, locally important waterfowl or shorebird concentration areas, or elk winter range”*. However, site scale protection does not allow for proper corridor planning or avoiding landscape scale habitat loss. Within Clark County, Elk and black-tail deer in particular need corridors for their migration between summer and winter ranges. Landscape scale 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. This is crucial for maintaining biodiversity and providing corridors for animal movement. Where necessary, wildlife overpasses or underpasses should be considered to maintain connectivity between habitats.
  
- **Zoning for Wildlife:** WDFW recommends maintaining low zoning densities around high-value habitat areas, including wildlife areas/refuges, large, forested tracts, and corridors. This approach will help minimize the fragmentation of habitats and the displacement of wildlife. WDFW supports the 2016 EIS strategy: *“Provisions for clustering under the Preferred Alternative could help minimize the amount of habitat loss. Zoning code changes to allow lower minimum parcel sizes could include requirements for cluster development when considering applications for subdivision.”* To continue efforts that prevent urban sprawl, higher densities should be zoned within urban landscapes and cities should prioritize infill development over outward expansion. These approaches can help reduce the encroachment on natural habitats and preserve more land for wildlife.
  
- **Urban Growth Management:** Taking a conservative approach in planning for urban area expansion reduces impacts on wildlife habitat. A landscape scale habitat assessment can help identify areas just beyond current urban growth areas that already contain fragmented habitats or barriers to habitat connectivity, and these areas might be the best choices for future urban growth. Natural areas that have already been converted to agricultural land are preferred for UGA incorporation over natural areas or land within wildlife corridors. It should also be noted that agricultural and forest lands designated as resource lands under GMA can provide important wildlife habitat (e.g., act as winter feeding areas, wildlife movement corridors, and buffers from more intense residential development). WDFW recommends locating designated long-term forest and agricultural lands next to other large landowners (federal, state, private) whose lands are likely to remain undeveloped over the long term. By grouping relatively undeveloped parcels and “working” landscapes (i.e., farm and forest land), habitat value can increase for wildlife because this landscape more closely mimics a natural landscape.
  
- **Smart Growth Policies:** Habitat loss and fragmentation, stormwater pollution, noise and light impacts, road mortality, and invasive plants from yards and gardens combine to eliminate some species from urban and suburban neighborhoods. The county should encourage compact, mixed-use development near existing infrastructure as this minimizes the need for new roads and reduces habitat fragmentation. In a growing climate, promoting walkable neighborhoods and efficient public transportation can utilize

existing infrastructure and reduce emissions. In resource lands where low-density residential development is permitted, the county can encourage retention of forested areas and other natural habitats, and minimize clearing and new impervious surfaces.

- **Limit Forestry Conversion:** Conserving forests is a natural climate solution, as mature forests provide carbon sequestration, resilience benefits, and ecosystem services. Removal of forested areas results in the loss of ecosystem services such as biodiversity, climate risk, mitigation through carbon sequestration, decreased shading, and decreased access to green spaces. Small forest landowners own significant amounts of forest across the state, and risk of conversion to other land uses is high in some jurisdictions. The county should encourage participation in Washington's small forest landowner assistance cost-share and stewardship programs. Washington's cost-share program focuses on technical and financial assistance to implement forest treatments or write forest management plans for landowners, while the stewardship program focuses on education to help landowners develop their own forest management plans. These types of programs can support landowners in keeping their lands forested and practicing ecological and climate-smart management. Local governments can advertise and encourage participation in these programs and work with DNR and WSU Extension for more information. <https://www.dnr.wa.gov/cost-share>.
- **Stormwater Management:** Implement green stormwater infrastructure (such as vegetated stormwater ponds, rain gardens, permeable pavement, and bioswales) to reduce runoff and filter pollutants. Whenever feasible, avoid impervious surfaces for roads or trails that prevent water from infiltrating into the soil.

WDFW looks forward to working with Clark County, and the jurisdictions 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,



Brittney Salter  
WDFW Southwest Washington Land Use Planning Lead

CC: Amaia Smith, WDFW Assistant Regional Habitat Program Manager  
CC: Joy Peplinski, WDFW Habitat Biologist

## References

- Rentz, R., A. Windrope, K. Folkerts, and J. Azerrad. 2020. Riparian Ecosystems, Volume 2: Management Recommendations. Habitat Program, Washington Department of Fish and Wildlife, Olympia. <https://wdfw.wa.gov/publications/01988>
- Tian et al. 2021. A ubiquitous tire rubber–derived chemical induces acute mortality in Coho Salmon. *Science*, 371(6525), 185–189. <https://doi.org/10.1126/science.abd6951>
- Washington Department Of Fish And Wildlife. 2009. Landscape Planning For Washington’s Wildlife: Managing For Biodiversity In Developing Areas. 88 Pp + App. Olympia, Wa.