

From: [Jeffrey Delapena](#)
To: [Justin Derhammer](#); [Cnty 2025 Comp Plan](#)
Cc: [Bill Iyall](#); [Lori Goodwin](#); [Sean Hess](#); [Christina E. Donehower](#); [Oliver Orjiako](#); [Jose Alvarez](#); [Jenna Kay](#)
Subject: RE: Cowlitz Indian Tribe's Comments on the Comprehensive Growth Management Plan Process and Draft DEIS
Date: Wednesday, November 26, 2025 11:46:42 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[Cowlitz Indian Tribe Comments to Clark Co re GMA DEIS.pdf](#)

Good day, Justin,

Thank you for submitting Cowlitz Indian Tribe's feedback related to the Draft Environmental Impact Statement for the 2025 Comprehensive Plan Update.

I have forwarded these comments to additional Staff and will enter them into the Index of Record.



Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558



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From: Justin Derhammer <jderhammer@cowlitz.org>
Sent: Wednesday, November 26, 2025 11:43 AM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Cc: Bill Iyall <BIyall@tc.cowlitz.org>; Lori Goodwin <lgoodwin@cowlitz.org>; Sean Hess <shess@cowlitz.org>; Christina E. Donehower <cdonehower@cowlitz.org>
Subject: Cowlitz Indian Tribe's Comments on the Comprehensive Growth Management Plan Process and Draft DEIS

You don't often get email from jderhammer@cowlitz.org. [Learn why this is important](#)

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.

Good morning,

Attached are the Cowlitz Indian Tribe's Comments on the Draft Environmental Impact Statement (DEIS), the proposed plan, and the planning process for the Updated Comprehensive Growth Management Plans of Clark County, Battle Ground, Camas, La Center, Ridgefield, Washougal, Woodland, and Yacolt.

Sincerely,

Justin Derhammer
Staff Attorney III
Cowlitz Indian Tribe
P.O. Box 996
Ridgefield, WA 98642
Cell: (269) 254-6774

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November 26, 2025

Oliver Orjiako, Director
Comprehensive Plan EIS
Community Planning
P.O. Box 9810
Vancouver, WA 98666

SENT VIA EMAIL:
comp.plan@clark.wa.gov

RE: Comments on the Draft Environmental Impact Statement (DEIS), the proposed plan, and the planning process for the Updated Comprehensive Growth Management Plans of Clark County, Battle Ground, Camas, La Center, Ridgefield, Washougal, Woodland, and Yacolt

Dear Director Orjiako:

Thank you for the opportunity to comment on the DEIS for the Updated Comprehensive Growth Management Plans of Clark County, Battle Ground, Camas, La Center, Ridgefield, Washougal, Woodland, and Yacolt, as announced on October 1, 2025. These comments should be considered both comments on the DEIS as well as general comments on the proposed plan and planning process.

The DEIS presents three alternatives for the management of future growth in Clark County, including Alternative 1, a “no action” alternative, which would allow for the continuation of the current growth management plan; Alternative 2, which would see an expansion of 1,037 acres of urban growth area (UGA); and Alternative 3, which envisions 2,545 additional acres of UGA.

The Cowlitz Indian Tribe is a federally recognized Indian Tribe of southwest Washington and northern Oregon. As Clark County is aware, the planning area lies in the heart of our homelands, in what is now Clark County. Since Time Immemorial, our people have hunted, fished, and gathered across this dynamic landscape, following a strategic seasonal round of resource acquisition. As an integrated part of our traditional lifeway, we have attached religious and cultural significance to properties throughout Clark County, including the over 800 recorded archaeological sites that are spread throughout the County, numerous traditional cultural places like the Cowlitz Trail, and even elements of the built environment like Fort Vancouver.

Changes to growth and development within Clark County will affect our ancestral lands and natural and cultural resources. The growth management plans also have the potential for direct effects on the lives of members of the Cowlitz Indian Tribe, many of whom live and work in the Clark County area. Because of the potential for this planning process to affect the lives and interests of our Tribal members, we appreciate the opportunity to comment.

The Cowlitz Indian Tribe understands that it is in the interest of everyone living and working in Clark County that growth be managed in such a way that housing and economic opportunities be provided for as many people as possible. At the same time, decisions about where to allow growth need to be made in such a way that negative effects are recognized and mitigated to the greatest extent possible.

The Forever People

Unfortunately, the DEIS does not provide the kinds of information that the Cowlitz Indian Tribe and people of Clark County need to make an informed decision about the management of growth, so it is difficult for the Cowlitz Indian Tribe to support any of the proposed alternatives. Please see the attached comment matrix for additional details, but we would like to emphasize the following concerns. The matrix demonstrates that Clark County is not adequately addressing the following goals of the Growth Management Act found in RCW 36.70A.020:

- Goal 2 Reduce sprawl.
- Goal 8 Protect natural resource-based industries.
- Goal 9 Enhance fish and wildlife habitat.
- Goal 10 Protect and enhance the environment.
- Goal 12 Adequate public facilities services.
- Goal 13 Historic preservation.
- Goal 14 Climate change and resiliency.

Presence of the Tribe

First, the DEIS almost completely overlooks the historical and ongoing role of the Cowlitz Indian Tribe in the life of Clark County. The first mention of the Tribe comes in Table 68, which shows the ilani Casino Hotel as being the seventh largest employer in Clark County, just after the County government itself. While this recognition is appreciated, it fails to demonstrate that the County understands the larger historical, cultural, and economic role of the Tribe in and with the County. This apparent disregard of the Tribe carries over into the maps providing the geographical context for the County's decision-making. Those areas that are outside of proposed UGAs are clearly demarcated. It is striking, therefore, that one of the areas where the County lacks the jurisdiction to regulate growth management – the lands held in trust by the U.S. Government for the Cowlitz Indian Tribe – are not clearly demarcated despite their proximity to the La Center and Ridgefield UGAs as proposed for Alternatives 2 and 3. The Cowlitz Reservation needs to be clearly recognized in this document because of its potential to affect the planning of the County and the cities of La Center and Ridgefield.

Natural Resources, Especially Salmon

Second, the Cowlitz Indian Tribe would like to highlight the impacts of the two action alternatives on natural resources, especially Endangered Species Act-listed salmonids. Salmon and steelhead are integral to Cowlitz culture and diet. Both action alternatives would convert considerable amounts of rural land to urban land, further degrading and fragmenting fish and wildlife habitat. According to the DEIS, Alternative 2 would add 6 stream miles and 17 acres of flood zone to UGAs, and Alternative 3 would add 12 stream miles and 124 acres of flood zone to UGAs. There are no assurances in the DEIS that these impacts can be fully mitigated. The Tribe, in addition to many other entities, has made substantial investments in salmon recovery throughout the County. Progress is being made, and the County is an important partner in these efforts. These proposed changes in UGAs would tend, over the long term, to work in opposition to the already existing investments. Within the study area, the East Fork Lewis and Salmon Creek/Lake River subbasins stand to be impacted the most by future

growth as described in the alternatives. For both subbasins, the [Washington Lower Columbia Salmon Recovery and Fish & Wildlife Subbasin Plan](#) identifies the following immediate priority: "Manage growth and development to protect watershed processes and habitat conditions." Whether fish are recovered will be driven, in large part, by whether such processes and conditions remain intact. Salmon recovery priorities should be considered up front in the planning process rather than as an afterthought (or once a proposal gets to the project-level review stage). Please provide realistic mitigations for these adverse effects.

Cultural Resources

Third, in the same way that the need for mitigation of negative effects to natural resources like salmon is overlooked, the DEIS fails to engage with cultural resources in a meaningful way. Washington Administrative Code (WAC) 365-196-450 defines "traditional cultural property" (TCP) as:

a property which has traditional cultural significance. It is associated with the cultural practices or beliefs of a living community that are rooted in that community's history, and are important in maintaining the continuing cultural identity of the community.

Unfortunately, the DEIS fails to acknowledge the presence of TCPs throughout the County, creating a substantial hole in their analysis of the impacts of expanding UGAs. While the Tribe often considers information about TCPs to be sensitive and not available for public disclosure, the Tribe would be open to discussing a protocol for their identification, as suggested by WAC 365-196-450(2)(a)(iii).

The analysis of impacts to archaeological resources also has significant limitations. Because there is not a comprehensive archaeological inventory of the proposed UGAs, the County relies on a proxy measure of the impacts to archaeological resources – the acres of areas with a high potential to contain archaeological resources as reflected in the State's archaeological predictive model. Despite recognizing that almost all the added acres of UGAs lie in high potential areas, the DEIS dismisses this identified impact without proposing appropriate mitigation measures. Please address the significant negative effect identified in your analysis.

Conclusion

We urge the County to go back to the drawing board with this DEIS, recognize the role of the Cowlitz Indian Tribe, and propose meaningful mitigations to the identified negative effects to natural and cultural resources. Until mitigations are proposed for critical review, we are unwilling to concur with any of the proposed alternatives.

Thank you for considering our comments. For questions concerning this letter, please contact Christina Donehower, Natural Resources Policy Analyst, and Sean Hess, Cultural Resources Policy Analyst. Christina can be reached at cdonehower@cowlitz.org or (360) 506-1848, and Sean can be reached at shess@cowlitz.org or (360) 846-8923.

Sincerely,

The Forever People

COWLITZ INDIAN TRIBE


Bill Iyall (Nov 27, 2025 09:16:40 PST)

William B. Iyall, P.E.
Tribal Chairman

cc: Dr. Allyson Brooks, Washington State Historic Preservation Officer

Enclosure: Comment Matrix

The Forever People

Cowlitz Indian Tribe Comment Matrix

Comment #	Section or Table, Page No.	Excerpt if Applicable	Comment Type	Comment
1	SEPA Fact Sheet, Proposal Description and Alternatives, page i	"The No Action Alternative keeps existing 2015-2035 Comprehensive Growth Management Plans in place with the inclusion of required density changes in the cities of Camas, Vancouver and Washougal to reflect the implementation of HB 1110."	Suggestion	"HB 1110" appears in the text four times, but there is not any kind of definition of this or explanation of its impact on growth management. Please consider providing a definition of this (perhaps as a footnote) to help the lay reader understand this legislation regarding growth management.
2	SEPA Fact Sheet, Proposal Location, page ii	"Unincorporated Clark County and the cities of Battle Ground, Camas, La Center, Ridgefield, Vancouver, and Washougal, Woodland (Clark County portion), and the Town of Yacolt."	Suggestion	The inclusion of Vancouver in this list of cities creates the impression that Vancouver is participating in the development of this document. However, this contradicts the prior statement on page i saying "City of Vancouver is also updating its comprehensive plan but intends to prepare separate environmental documentation for its plan update." Please consider removing Vancouver from this sentence on page ii, or provide a better explanation of the level of Vancouver's participation in the development of this DEIS.
3	1.0 Introduction and Summary, page 1	"Clark County and the cities and towns of Battle Ground, Camas, La Center, Ridgefield, Vancouver, Washougal, Woodland, and Yacolt are proposing to revise their Comprehensive Growth Management Plans (Comprehensive Plans, Growth Management Plans, or Plans) to comply with the requirements of the Growth Management Act (GMA)."	Suggestion	Similar to Comment #2 above. The inclusion of Vancouver in this list of cities creates the impression that Vancouver is participating in the development of this document. However, this contradicts the prior statement on page i saying "City of Vancouver is also updating its comprehensive plan but intends to prepare separate environmental documentation for its plan update." Please consider removing Vancouver from this sentence on page 1, or provide a better explanation of the level of Vancouver's participation in the development of this DEIS.
4	1.0 Introduction and Summary, page 5		Critical	Both Alternatives 2 and 3 are described in the DEIS as "exceed[ing] the land capacity needed to accommodate the housing and job growth projected for the next 20 years." This implies there is excess capacity built-in to the action alternatives. If that is the case, what is the rationale behind the high levels of proposed UGA expansion that would convert more rural land to urban land than needed?
5	1.0 Introduction and Summary, page 5		Critical	According to the DEIS, Alternative 2 would expand UGAs by approximately 1,037 acres and add 6 stream miles and 17 acres of flood zone to UGAs, and Alternative 3 would expand UGAs by approximately 2,545 acres, provide for additional site-specific rezoning requests, and add 12 stream miles and 124 acres of flood zone to UGAs. Such high levels of environmental impact are of great concern to the Cowlitz Indian Tribe and will affect our lands and natural and cultural resources. There are no assurances in the DEIS that these impacts can be fully mitigated.
6	Table 5. Summary of Mitigation/Plant and Animal Resources, page 11	"The protection of fish and wildlife habitat conservation areas is addressed in comprehensive plan policies and implemented through local ordinances.... Mitigation for impacts to migratory species and habitat is the same as for fish and wildlife habitat, above."	Critical	As acknowledged elsewhere in the DEIS, regulations cannot realistically eliminate all impacts from urbanization. Moreover, some migratory species require large blocks of contiguous, intact habitat, underscoring the need for foresight and thoughtful growth management planning. Landscape-scale priorities like those identified in the Washington Lower Columbia Salmon Recovery and Fish & Wildlife Subbasin Plan (LCFRB 2010) and Washington Habitat Connectivity Action Plan (Michalak et al. 2025) should be proactively considered in planning efforts like this one. Lower Columbia Fish Recovery Board (LCFRB). 2010. Washington Lower Columbia Salmon Recovery and Fish & Wildlife Subbasin Plan. LCFRB, Longview, WA. Available: https://lcfwb.org/library/recovery-plans . Michalak, J. L., G. P. Kalisz, H. A. Morgan, S. M. DeMay, Z. Kaszta, J. Azerrad, E. Bockstiegel, A. Shirk, and P. Cramer. 2025. Washington Habitat Connectivity Action Plan. Washington Department of Fish and Wildlife and Washington Department of Transportation, Olympia, WA. Available: https://wdfw.wa.gov/publications/02630 . Spatial data available: https://wdfw.maps.arcgis.com/home/item.html?id=c2d2f9ff6e6cf47fb8630daa02a70c45f .

Cowlitz Indian Tribe Comment Matrix

Comment #	Section or Table, Page No.	Excerpt if Applicable	Comment Type	Comment
7	Table 5. Summary of Mitigation/Land and Shoreline Use, page 12	<p>"Mitigation for the lack of sufficient land capacity for the 20-year growth projection is to change growth or redevelopment assumptions or upzone land within existing UGAs. Clark County's comprehensive plan has policies that protect rural lands. Development on rural lands is also regulated by the county's zoning code, which establishes rural districts and permitted uses.</p> <p>Clark County's comprehensive plan policies protect resource lands from incompatible uses and from conversion to urban land. The zoning code regulates the intensity and nature of development that can occur on and adjacent to resource lands. City comprehensive plans contain policies that direct development away from productive forest and farm land."</p>	Critical	Review of the Growth Management Act (GMA) shows that the Washington legislature intended for historic preservation and cultural resources management to be one of the major elements of growth management planning. Witness RCW 36.70A.020 "Planning goals," which lists "Historic preservation" as a planning goal on par with transportation, recreation, and the environment. The GMA also provides multiple opportunities for Tribes to participate in growth management, as shown in RCW 36.70A.040 and elsewhere. In this light, it is disappointing to see consideration of cultural resources management and historic preservation buried deeply in the document. There is no call out of cultural resources management or historic preservation in the Table of Contents, and it is not until the reader reaches Section 3.8 "Lands and Shoreline Use", Subsection 3.8.1.F, that the reader comes to know that "Historic and Cultural Resources" are even considered in this DEIS. Please revise the outline to give historic preservation and cultural resources management a footing on par with transportation in keeping with the organization of the Growth Management Act. All of Clark County is within the traditional homeland of the Cowlitz Indian Tribe, and management of growth in this area has a direct impact on the management of our tribal heritage, as construction has repeatedly adversely affected our legacy.
8	Table 5. Summary of Mitigation/Land and Shoreline Use, page 12	<p>"Mitigation for the lack of sufficient land capacity for the 20-year growth projection is to change growth or redevelopment assumptions or upzone land within existing UGAs. Clark County's comprehensive plan has policies that protect rural lands. Development on rural lands is also regulated by the county's zoning code, which establishes rural districts and permitted uses.</p> <p>Clark County's comprehensive plan policies protect resource lands from incompatible uses and from conversion to urban land. The zoning code regulates the intensity and nature of development that can occur on and adjacent to resource lands. City comprehensive plans contain policies that direct development away from productive forest and farm land."</p>	Critical	The growth of the UGAs and resultant construction is likely to result in adverse effects to cultural resources valued by the Cowlitz Indian Tribe and other members of the public. Please provide language in this table summarizing the mitigation steps to be followed to address these adverse effects.
9	Table 6. Summary of Unavoidable Impacts/Water, page 14	"Unavoidable impacts include more impervious surfaces in critical recharge areas and greater risk of contamination from new industrial and commercial development in areas that currently are rural. Alternative 1 could result in more pressure to develop in rural areas and install septic systems. More rural residential development increases the eventual risk of septic system failures that can contaminate private well water and public water sources."	Critical	The DEIS authors only call out Alternative 1 in this section on water. Why are unavoidable impacts not similarly attributed to Alternatives 2 and 3? Please better clarify in the DEIS how unavoidable impacts compare among the three alternatives. A chart or similar visual summarizing the relative magnitude of effects for implementing each alternative would be especially helpful.
10	Table 6. Summary of Unavoidable Impacts/Plants and Animals, page 14	"Requirements for protecting critical habitats are found in the GMA, Endangered Species Act (ESA), and the Shoreline Management Act (SMA). All Clark County jurisdictions have implemented requirements to protect critical areas, which include fish and wildlife habitat. There is little mitigation available, however, for the incremental loss of fish and wildlife habitat within larger watersheds. Native plants and animals are displaced by development."	Suggestion	Please clarify that some requirements to protect critical areas vary by jurisdiction (e.g., width of riparian buffers). Ensuring protective standards are adequate is important for sustaining healthy, resilient fish and wildlife populations and making continued progress on salmon recovery.
11	Table 6. Summary of Unavoidable Impacts/Plants and Animals, page 14	"As with the potential unavoidable impacts on surface and ground water, mitigation based on Best Available Science is likely more effective at avoiding or mitigating impacts, but not all impacts from urbanization can realistically be eliminated."	Suggestion	"Best Available Science" is referenced here and two other places in the DEIS. We urge Clark County to recognize the importance of incorporating Indigenous Knowledge into planning and decision-making where appropriate and when centered on principles of free, prior, and informed consent. Washington Executive Order 25-10 is a step in the right direction and already directs cabinet agencies making decisions or setting standards based on best available science to "account for available and tribally accepted Indigenous Knowledge."

Cowlitz Indian Tribe Comment Matrix

Comment #	Section or Table, Page No.	Excerpt if Applicable	Comment Type	Comment
12	3.1 Approach to Analyses, B. How are impacts evaluated?, page 19	"The determination of impacts of each alternative depends on knowing where the natural resources are and how much of each resource area could be impacted by the implementation of each alternative of the Comprehensive Plan update assessed here. Where impacts on natural resources or the built environment can be quantified, the analysis relies on Geographic Information System (GIS) mapping of resources to assess the location and size of the natural resources, such as soils, streams, wetlands, shorelines, schools, parks, landfills, etc. and how the changes proposed in the Comprehensive Plan might affect resources by converting rural land to urban land through the expansion of urban growth areas (UGAs) or the alteration of city boundaries."	Suggestion	The authors have used "natural resources" as a catch-all phrase for the things that are being analyzed in this analysis, but many of the things that are being analyzed, including "schools, parks, landfills, etc." are not (by any conventional use of the phrase) "natural resources." Furthermore, the phrase does not capture the important distinction between "natural resources" and "cultural resources." Please rewrite this entire paragraph to better reflect the distinctions between "natural resources," "cultural resources," and "elements of the built environment."
13	3.1 Approach to Analyses, B. How are impacts evaluated?, page 19	"The determination of impacts of each alternative depends on knowing where the natural resources are and how much of each resource area could be impacted by the implementation of each alternative of the Comprehensive Plan update assessed here. Where impacts on natural resources or the built environment can be quantified, the analysis relies on Geographic Information System (GIS) mapping of resources to assess the location and size of the natural resources, such as soils, streams, wetlands, shorelines, schools, parks, landfills, etc. and how the changes proposed in the Comprehensive Plan might affect resources by converting rural land to urban land through the expansion of urban growth areas (UGAs) or the alteration of city boundaries. The UGAs and city boundaries for each alternative were overlaid on those resources and GIS software was used to calculate how much of the resource is found within each of the current and proposed boundaries."	Critical	While it is appreciated that the DEIS authors provided an explicit explanation of how they are going to measure effects (i.e., by using GIS to "calculate how much of the resource is found within each of the current and proposed boundaries"), they did not stick to their analytical method when it comes to the results showing that 1,037 acres of area with a moderate-to-high potential for containing archaeological resources were going to be impacted under Alternative 2 and that 2,545 acres of moderate-to-high potential for containing archaeological resources were going to be impacted under Alternative 3. Please provide additional comments on this same theme below when it comes to the evaluation of the alternatives.
14	3.2.2.4 Impacts from Climate Change, page 44	"According to the United Nations Intergovernmental Panel on Climate Change (IPCC) and the U.S. Environmental Protection Agency (EPA), temperatures in Washington State could increase by about 5 degrees Fahrenheit in winter and summer and by about 4 degrees Fahrenheit in spring and fall over the next 100 years."	Suggestion	This IPCC study and the EPA study should be cited properly and added to the list of references cited in 3.2.4 References. Also, there are analyses that are more focused on the Pacific Northwest than this reference. Please consider updating this with more regionally focused information like that provided in the River Management Joint Operating Committee (RMJOC) studies (https://www.bpa.gov/-/media/Aep/power/hydropower-data-studies/rmjoc-ll-report-part-1.pdf).
15	3.3.2 Significant Environmental Impacts, B. Climate, page 50	"None of the alternatives would have a direct impact on the climate of the region in the short-term. The changes that each alternative would bring about in land use, transportation, the environment, and the economy would take place gradually over the planning period and beyond."	Suggestion	While we recognize that this planning effort covers the next 20 years, there is a critical need for planning on much longer timeframes. Addressing climate change requires solutions that respond to both near-term and long-term impacts. Collaboration and leadership at all levels of Tribal, state, federal, and local governments are needed.
16	3.5 Plants and Animals, pages 72-89		Critical	Please address salmon recovery investments and priorities in the DEIS. Considerable conservation and habitat restoration work has been done (and is continuing to be done) for these culturally, economically, and ecologically important species. Within the study area, the East Fork Lewis and Salmon Creek/Lake River subbasins stand to be impacted the most by future growth as described in the alternatives. For both subbasins, the Washington Lower Columbia Salmon Recovery and Fish & Wildlife Subbasin Plan (LCFRB 2010) identifies the following immediate priority: "Manage growth and development to protect watershed processes and habitat conditions." Whether fish are recovered will be driven, in large part, by whether such processes and conditions remain intact. Salmon recovery priorities should be considered up front in the planning process rather than as an afterthought (or once a proposal gets to the project-level review stage).

Cowlitz Indian Tribe Comment Matrix

Comment #	Section or Table, Page No.	Excerpt if Applicable	Comment Type	Comment
17	3.5 Plants and Animals, pages 72-89		Suggestion	<p>When discussing salmonids in this section, we suggest describing species and populations consistent with the Washington Lower Columbia Salmon Recovery and Fish & Wildlife Subbasin Plan (LCFRB 2010) and Lower Columbia Conservation & Sustainable Fisheries Plan - 2023 Progress Report (Manlow et al. 2023). Clark County includes all or portions of the following subbasins/watersheds (with the number of ESA-listed salmon and steelhead populations indicated in parentheses):</p> <ul style="list-style-type: none"> North Fork Lewis (7 populations) East Fork Lewis (5 populations) Salmon (4 populations) Washougal (5 populations) Lower Gorge Tributaries (4 populations) <p>The North Fork Lewis and East Fork Lewis are especially important because they support 4 and 5 "primary populations," respectively; these primary populations are critically important for meeting regionwide fish recovery goals.</p> <p>Manlow, S., A. Johnson, B. Glaser, T. Buehrens, T. Hillson, and R. Beamesderfer. 2023. Lower Columbia Conservation & Sustainable Fisheries Plan - 2023 Progress Report. LCFRB, Vancouver, WA. Available: https://cdn.lcfrib.org/docs/library/ViabilityAssessment_2024-02-01.pdf.</p>
18	Table 43. Threatened and Endangered Animals within Clark County (WDFW 2025), page 74, and Table 44. Threatened and Endangered Plants in Clark County (DNR 2025), page 75		Suggestion	<p>We recommend changing the subsection header and titles of Tables 43 and 44 to better reflect their contents. Currently, the header/table titles only mention threatened and endangered species, but sensitive and extirpated species are also included. A broader term like "special status species" is one option and could be explained in the narrative. Many species are also protected by a combination of federal, state, and local regulations. We suggest mentioning other key plant and animal protections such as the Migratory Bird Treaty Act, Bald and Golden Eagle Protection Act, and Marine Mammal Protection Act.</p>
19	3.6.1 Description of the Affected Environment, B. Scenic Resources, page 92	"Therefore, scenic resources are protected only to the extent that they are associated with natural resources."	Suggestion	<p>Another shortcoming of this analysis is that it does not consider the potential for additional urban growth to affect the integrity of traditional cultural places, especially impacts to the visual integrity of traditional cultural properties. At a minimum, the analysis should be revised to acknowledge the potential for urban growth to visually affect TCPs.</p>
20	Table 68. Largest Employers in Clark County, 2025, page 121	Company: ilani Casino Hotel; No. of Employees: 1,500; Location: Cowlitz Tribe Lands	Critical	<p>We are disappointed to see that this table row and the distribution list in Appendix C are the only references to the Cowlitz Indian Tribe in the DEIS. The Cowlitz Indian Tribe is a federally recognized Indian Tribe of southwest Washington and northern Oregon. The Cowlitz People have maintained continuous occupancy in what is now Clark County since Time Immemorial. At a minimum, we recommend expanding the Introduction and/or Historic and Cultural Resources sections to better recognize the enduring connection of area Tribes to this landscape.</p>
21	3.8.1 Description of the Affected Environment, F. Historic and Cultural Resources, page 122	"Many of the county's historical resources no longer exist due to development and increasing urbanization."	Critical	<p>This is an inaccurate statement. While urban development certainly has had an impact on the integrity of archaeological sites and traditional cultural places, to conclude that "many of them no longer exist" is incorrect. Please revise this statement to note that archaeological resources and TCPs are present throughout the County and continue to remain important to the ongoing identity of the Cowlitz Indian Tribe as a people.</p>
22	3.8.1. Description of the Affected Environment, F. Historic and Cultural Resources, page 122	"A full list of these resources is maintained by County staff."	Suggestion	<p>This statement is incorrect, as it gives the impression that County staff have comprehensive information about the location of cultural resources. A comprehensive cultural resources survey has not been conducted of the County. Please revise this statement. Please include a characterization based on GIS data regarding the percentage of the County that has been investigated for archaeological resources. These data are available from DAHP.</p>
23	Table 69. Existing Historic Built Environment Resources in Clark County, page 122		Suggestion	<p>This table needs to note that, while it may be accurate with regard to the number of listed properties, it does not include all of the properties that are eligible for inclusion in the National Register and are thus still historic properties. Please provide a revised explanation noting that other properties eligible for the National Register are likely to be found, as the inventory of historic properties is not yet complete in Clark County.</p>
24	3.8.1 Description of the Affected Environment, F. Historic and Cultural Resources, page 122	"Much of the county has been identified as having a high probability for archaeological resources, in part because of the area's rich history and its importance as a settlement location."	Critical	<p>Please replace the word "Much" with the word "Most," as Table 70 shows that 60,538 acres of the 96,913 acres under consideration (i.e., 62.5%) have a High potential. If one groups "High" and "Moderate-High" together, this percentage increases to 95.9% of the area considered. Because this percentage is well over 90%, use of the word "Most" becomes a much more accurate way of depicting the situation. This would also more accurately convey the magnitude of the impact on cultural resources of the expansion of urban growth.</p>

Cowlitz Indian Tribe Comment Matrix

Comment #	Section or Table, Page No.	Excerpt if Applicable	Comment Type	Comment
25	3.8.2.2 Impact of Alternative 2, C. Resource Lands, page 131	"The conversion of these agricultural lands may also conflict with GMA rules around UGA expansion into designated agricultural lands since the county and cities do not have a program authorizing transfer or purchase of development rights and/or depending on the outcome of an agricultural resource study that evaluates the criteria for agricultural lands of long-term commercial significance (WAC 365-196-310)."	Critical	The Clark County Agricultural Lands Study was released on November 5, 2025, about midway through the 60-day public comment period for the DEIS. It would have been helpful if these study results had been made available sooner and had been addressed as part of the DEIS. It is our understanding that the agricultural lands study will be used to inform the alternatives analysis and selection of the preferred alternative.
26	Table 78. Alternative 2 Area of Moderate to High Archaeological Predictability as compared to Alternative 1 (Acres), page 133		Suggestion	The reader would get a better sense of the level of potential impacts of the alternatives on archaeological resources if each of the alternatives were placed on a single table. Please provide a summary table comparing the level of impact of the No Action Alternative and the two action alternatives.
27	3.8.2.3 Impact of Alternative 3, C. Resource Lands, page 138	"The conversion of these agricultural lands may also conflict with GMA rules around UGA expansion into designated agricultural lands since the county and cities do not have a program authorizing transfer or purchase of development rights and/or depending on the outcome of an agricultural resource study that evaluates the criteria for agricultural lands of long-term commercial significance (WAC 365-196-310)."	Critical	Same as Comment #25 above.
28	3.8.2.3 Impact of Alternative 3, F. Historic and Cultural Resources, page 140	"While a comparison of the expanded UGA areas proposed for Alternative 3 against the location of historic built environment resources and the Archaeological Predictive Model can determine the potential for impacts to cultural resources, actual impacts are a matter of project-level discussions. These impacts would be evaluated and addressed during project-level environmental review and permitting. As can be seen in Figure 51, most areas within and adjacent to UGAs are listed as having a moderate to high predictability for encountering archaeological resources. As a result, the area of moderate to high predictability affected by Alternative 3 is more closely related to the size of the UGA expansion as opposed to the location of the expanded areas."	Critical	This text seems to be a way of saying, "It looks like Alternative 3 would more than double the impacts of Alternative 2, but we really can't tell if this going to be all that bad because we won't really know until we develop the individual projects." It is acknowledged that the analysts are in a difficult situation, as there is not a comprehensive archaeological survey of the county, so they have to rely on the predictive model. However, that is the best available science at this point in time, and saying that we don't really know until we start running bulldozers undercuts the validity of your analytical technique. Both of the action alternatives, as measured by the number of acres of high-to-moderate potential lands, would increase the likelihood for adverse effects to archaeological resources. Based on the acreage, the County can expect that the impacts on archaeological resources for Alternative 3 would be roughly double that of Alternative 2. This is the most accurate reading of the impact index used by the analysts. Please revise these statements to follow the results of the analysis.
29	3.8.3 Avoidance and Mitigation Measures, F. Historic and Cultural Resources, page 142	"There would be no significant adverse impacts to historic and cultural resources under Alternatives 2 or 3."	Critical	This conclusion does not line up with the results of the analysis and needs to be extensively revised. Alternative 2 increases impacts to cultural resources by putting 1,037 acres more development in moderate and high potential areas. Alternative 3 shifts development into 2,545 acres of moderate and high potential. Those are the results based on the impact index (acres in high-top-moderate potential areas) that the analysts decided to use, and they need to stick with the results. Please revise this section to acknowledge the significantly increased chance for adverse effects to historic properties from both of the action alternatives and provide a reasonable mitigation process. One suggestion would be for the County and Cities to provide funding for proactive cultural resources surveys in those areas where they propose to allow for expansion of urban growth, especially those zones with a high potential to contain archaeological resources. This plan should also include steps to identify traditional cultural places in the expansion areas.
30	Appendix A, pages 217-271	All of the maps showing the extent of the UGA under each of the alternatives covering La Center and Ridgefield	Critical	The maps of La Center and Ridgefield should be revised to show the extent of the Cowlitz Reservation, as land within the Reservation held in trust by the U.S. for the Tribe is not subject to county jurisdiction. At the same time, as one of the biggest employers in Clark County, it has the potential to affect urban growth. Denoting the location of the Reservation, given its unique legal and economic relationship to the County, is an important step to providing for an accurate analysis.