

From: [Jeffrey Delapena](#)
To: [Cnty 2025 Comp Plan](#); [Tim Trohimovich](#)
Cc: [Brooke Frickleton](#); [Oliver Orjiako](#); [Jose Alvarez](#); [Jenna Kay](#)
Subject: FW: Comments on Draft EIS for the Comp Plan Update
Date: Monday, December 1, 2025 8:08:46 AM
Attachments: [Outlook-0pdxctxd](#)
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[2024-11-25 FW Comments on EIS for Comp Plan Update Clark Cnty.pdf](#)
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[image003.png](#)
[image004.png](#)

Good day, Tim,

Thank you for submitting Futurewise'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
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COMMUNITY PLANNING

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From: Tim Trohimovich <Tim@futurewise.org>
Sent: Wednesday, November 26, 2025 5:29 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Cc: Brooke Frickleton <brooke@futurewise.org>
Subject: Comments on Draft EIS for the Comp Plan Update

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Dear Staff and Consulting Team:

Enclosed please find Futurewise's comments on the Draft Environmental Impact Statement for the Updated Comprehensive Growth Management Plans of Clark County, Battle Ground, Camas, La Center, Ridgefield, Washougal, Woodland and Yacolt (October 1, 2025). Thank you for considering our comments.

If you need anything else, please let me know.

Tim Trohimovich, AICP (he/him)
Director of Planning & Law



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November 26, 2025

Community Planning
Clark County
Comp Plan Comments
P.O. Box 9810
Vancouver Washington 98666

Dear Staff and Consulting Team:

Subject: Comments on the Draft Environmental Impact Statement for the Updated Comprehensive Growth Management Plans of Clark County, Battle Ground, Camas, La Center, Ridgefield, Washougal, Woodland and Yacolt (October 1, 2025)

Sent via email: comp.plan@clark.wa.gov

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for the Updated Comprehensive Growth Management Plans of Clark County, Battle Ground, Camas, La Center, Ridgefield, Washougal, Woodland and Yacolt (October 1, 2025) (DEIS). Futurewise agrees with the County's decision to prepare an environmental impact statement (EIS). The comprehensive plan and the development it will authorize is likely to have a significant probable adverse impact on the environment. We appreciate that Clark County is preparing an EIS to address these impacts. We also appreciate the helpful information included in the DEIS.

In addressing the adequacy of a nonproject EIS, the Court of Appeals wrote that:

In Leschi v. Highway Comm'n, 84 Wn.2d 271, 525 P.2d 774 (1974), a majority of the Supreme Court held that the adequacy question is one of law, subject to *de novo* review by the courts. The test to be applied is "whether the environmental effects of the proposed action and reasonable alternatives are sufficiently disclosed, discussed and that they are substantiated by supportive opinion and data." *Leschi v. Highway Comm'n*, *supra* at 286, 525 P.2d at 785.¹

WAC 197-11-440(6)(a) requires that for the elements of the environment significantly affected by the proposed action, "the EIS shall describe the existing

¹ *Ullock v. City of Bremerton*, 17 Wn. App. 573, 580, 565 P.2d 1179, 1184 (1977).



environment that will be affected by the proposal, analyze significant impacts of alternatives including the proposed action, and discuss reasonable mitigation measures that would significantly mitigate these impacts.” WAC 197-11-442 (1) provides that the lead agency shall have more flexibility in preparing EISs on nonproject proposals. WAC 197-11-442(2) also provides that for nonproject EISs

[t]he lead agency shall discuss impacts and alternatives in the level of detail appropriate to the scope of the nonproject proposal and to the level of planning for the proposal. Alternatives should be emphasized. In particular, agencies are encouraged to describe the proposal in terms of alternative means of accomplishing a stated objective (see WAC 197-11-060(3)). Alternatives including the proposed action should be analyzed at a roughly comparable level of detail, sufficient to evaluate their comparative merits (this does not require devoting the same number of pages in an EIS to each alternative).

As is documented below, the DEIS fails to comply with these requirements for several elements of the environment.

Comments on the Alternatives

One alternative should accommodate the selected population and employment projections within the existing urban growth areas and not convert natural resource lands to other uses.

Futurewise reiterates its comments from its June 5, 2024, letter on the scope of the EIS that the EIS needs to include one alternative should accommodate the selected population and employment projections within the existing urban growth areas (UGA) and not convert natural resource lands to other uses. None of the three alternatives meet this recommendation. The Washington State Supreme Court has written that:

The State Environmental Policy Act of 1971 (SEPA) directs that “alternatives to the proposed action” be included in an EIS. RCW 43.21C.030(c)(iii). Under the Washington Administrative Code, consideration by the County Council of reasonable alternatives is mandatory. WAC 197-11-440(5)(b). SEPA rules define “reasonable alternatives” as less environmentally costly action that “could

feasibly attain or approximate a proposal's objectives." WAC 197-11-786.²

The Determination of Significance and Request for Comments on Scope of Environmental Impact Statement identifies its objectives as the alternative's "ability to accomplish the objectives of GMA and the objectives of the Comprehensive Plan and County-wide Planning Policies."³ This alternative will feasibly attain or approximate the proposal's objectives of complying with the Growth Management Act (GMA), the comprehensive plan objectives, and the county-wide planning policies at lower environmental costs. This is explained in more detail in Futurewise June 5, 2024, letter on the scope of the EIS.

None of the alternatives in the DEIS achieves the objectives from the scoping notice with less environmental impact than this alternative. Therefore Alternatives 2 and 3 should not have been included in the DEIS. The failure to include an alternative that accommodates the selected population and employment projections within existing urban growth areas (UGAs) means the EIS is inadequate.

Comments on the Affected Environment, Significant Impacts, and Mitigation Measures

Comments on 3.3.1 Description of the Affected Environment, A. Air Quality and B. Climate. Please see pp. 49 through 55.

SEPA EISs are required to analyze greenhouse gas pollution.⁴ In addition, RCW 36.70A.070(9)(d)(i)(A) provides:

(d)(i) The greenhouse gas emissions reduction subelement of the comprehensive plan, and its related development regulations, must identify the actions the jurisdiction will take during the planning

² *King Cnty. v. Cent. Puget Sound Growth Mgmt. Hearings Bd.*, 138 Wn.2d 161, 183, 979 P.2d 374, 385 (1999), as amended on denial of reconsideration (Sept. 22, 1999).

³ State Environmental Policy Act Determination of Significance and Request for Comments on Scope of Environmental Impact Statement Clark County Comprehensive Plan Update 2025-2045 p. 3 of 4 (May 15, 2024).

⁴ *Columbia Riverkeeper, Sierra Club, and Center For Biological Diversity v. Cowlitz County, Port of Kalama, Northwest Innovation Works-Kalama, LLC, and State of Washington, Department of Ecology*, Shorelines Hearings Board (SHB) No. 17-010c, Order on Motions for Partial Summary Judgment (Sept. 15, 2017), at 18, 2017 WL 10573749, at *9.

cycle consistent with the guidelines published by the department pursuant to RCW 70A.45.120 that will:

(A) Result in reductions in overall greenhouse gas emissions generated by transportation and land use within the jurisdiction but without increasing greenhouse gas emissions elsewhere in the state[.]

While we appreciate that the DEIS identified current greenhouse gas emissions, we recommend that the EIS also analyze the impacts of the alternatives to ensure they comply with RCW 36.70A.070(9)(d)(i)(A)'s require for an overall reduction in greenhouse gas emissions.

Comments on Table 4. Summary of Potential Environmental Impacts p. 8 and 3.4.2 Significant Environmental Impacts A. Surface Water on pp. 60 – 61.

All of Washington's water is already allocated to a water user. According to Ria Berns, who manages the Washington State Department of Ecology's Water Resources Program, "[e]ven when there is enough snowpack and enough water flowing through Washington's rivers and streams, it's all spoken for"⁵ The State of Washington Department of Ecology writes that for the Cowlitz, Lewis, and Salmon-Washougal watersheds:

Increasing demands for water over time, from ongoing population growth, agriculture, and other consumptive uses as well as associated land use practices, have resulted in lower streamflows and declining groundwater levels in some areas. These decreases have impacted important resources for fisheries and general stream health.⁶

⁵ Conrad Swanson, *Trump keeps talking about taking PNW water – is that possible?* The Seattle Times (Updated Feb. 23, 2025 at 7:00 am) last accessed on May 12, 2025, at: <https://www.seattletimes.com/seattle-news/climate-lab/trump-keeps-talking-about-taking-pnw-water-is-that-possible/> and at the link on the last page of this letter with the filename: "Trump keeps talking about taking PNW water is that possible.pdf."

⁶ State of Washington Department of Ecology, Water Resources Program, *WRIA 26 Cowlitz Watershed Water Availability* p. 3 (Publication 20-11-026 Oct. 2023) last accessed on Nov. 26, 2025, at: <https://ecology.wa.gov/water-shorelines/water-supply/water-availability/in-your-watershed> and enclosed at the link on the last page of this letter with the filename: "2011026.pdf;" State of Washington Department of Ecology, Water Resources Program, *WRIA 27 Lewis Watershed Water Availability* p. 3 (Publication 20-11-027 Sept. 2023) last accessed on Nov. 26, 2025, at: <https://ecology.wa.gov/water-shorelines/water-supply/water-availability/in-your-watershed> and enclosed at the link on the last page of this letter with the filename: "2011027.pdf;" State of Washington Department of Ecology, Water Resources Program, *WRIA 28 Salmon-Washougal*



The DEIS does not address the lack of water availability in the County's basins. The DEIS does not address the adverse environmental impacts of water withdrawals Ecology has already found in the county's watersheds. The EIS also does not address the impact of permit-exempt wells on surface or ground either despite Alternative 2's planned rural population increase of 1,037 and Alternative 3's planned rural population increase of 2,545.⁷ Futurewise's June 5, 2024, letter on the scope of the EIS wrote that rural development adversely impacts water resources and the availability of irrigation and stock water in Clark County.⁸ Surface and ground water are elements of the environment.⁹ The impacts of addition urban and rural water withdrawals for new development on surface and ground water must be analyzed in the EIS. The impacts of transfers of agricultural water rights for development must also be analyzed.

The existing water limitations will be aggravated by increasing droughts. As the *Clark Regional Natural Hazard Mitigation Plan Volume 1—Planning Area-Wide Elements* documents:

Although there is still some uncertainty regarding climate change impacts on the water cycle, most current models project increases in precipitation in winter, spring and fall and decreases in precipitation in summer. This decrease in precipitation, coupled with higher average summer temperatures, may contribute to an increase in the frequency, severity and duration of droughts in the region (Dalton et al., 2013). More frequent extreme events such as droughts could end up being more cause for concern than the long-term change in temperature and precipitation averages. According to the Washington State Department of Ecology, Washington has experienced unusually

Watershed Water Availability p. 3 (Publication 20-11-028 Sept. 2023) last accessed on Nov. 26, 2025, at: <https://ecology.wa.gov/water-shorelines/water-supply/water-availability/in-your-watershed> and enclosed at the link on the last page of this letter with the filename: "2011028.pdf."

⁷ Draft Environmental Impact Statement for the Updated Comprehensive Growth Management Plans of Clark County, Battle Ground, Camas, La Center, Ridgefield, Washougal, Woodland and Yacolt p. 4 (October 1, 2025).

⁸ State of Washington Department of Ecology, Water Resources Program, *WRIA 26 Cowlitz Watershed Water Availability* p. 3 (Publication 20-11-026 Oct. 2023); State of Washington Department of Ecology, Water Resources Program, *WRIA 27 Lewis Watershed Water Availability* p. 3 (Publication 20-11-027 Sept. 2023);" State of Washington Department of Ecology, Water Resources Program, *WRIA 28 Salmon-Washougal Watershed Water Availability* p. 3 (Publication 20-11-028 Sept. 2023).

⁹ WAC 197-11-444(1)(c)(i), (ii), (iv), (v).



dry periods almost every year since 2000 (Washington Department of Ecology, 2007).¹⁰

Further, RCW 36.70A.070(9)(e)(i) requires that “[s]pecific goals, policies, and programs of the [comprehensive plan] resiliency subelement must include, but are not limited to, those designed to: ... (C) Address natural hazards created or aggravated by climate change, including sea level rise, landslides, flooding, drought, heat, smoke, wildfire, and other effects of changes to temperature and precipitation patterns.” Consistent with this requirement, when analyzing water resources, the EIS must adequately analyze future droughts and propose mitigation measures for droughts.

Comments on 3.8.2.2 Impact of Alternative 2 C. Resource Lands on p. 131.

The DEIS claims that “[t]he transfer of land represents approximately 1 percent of the existing agricultural lands, and as such does not represent a substantial loss of resource lands.” The DEIS does not cite to any evidence or include any analysis supporting this conclusion. Further, just examining the percentage loss is the wrong standard for analyzing the loss of agricultural lands.

The Court of Appeals concluded that

[t]he principal GMA goal served by designating and conserving [agricultural resource lands] ARL is that of RCW 36.70A.020(8): to “[m]aintain and enhance natural resource-based industries, including productive ... agricultural ... industries.” This and related provisions evidence “a legislative mandate for the conservation of agricultural land.” *King County*, 142 Wn.2d at 562, 14 P.3d 133. The purpose of ARL designation is further focused by WAC 365-190-050(5), which states that in the application of ARL designation criteria, “the process should result in designating an amount of [ARL] sufficient to maintain and enhance the economic viability of the agricultural industry in the county over the long term.”¹¹

¹⁰ Clark Regional Emergency Services Agency, *Clark Regional Natural Hazard Mitigation Plan Volume 1—Planning Area-Wide Elements* p. 8-8 (Approved: March 31, 2023) last accessed on Nov. 26, 2025, at: <https://clark.wa.gov/communications/clark-regional-natural-hazard-mitigation-plan> and enclosed at the link on the last page of this letter with the filename: “CRNHMP Vol 1 2023_202304041255191062.pdf.”

¹¹ *Concerned Friends of Ferry Cnty. v. Ferry Cnty.*, 191 Wn. App. 803, 831–32, 365 P.3d 207, 221 (2015).

The EIS needs to analyze whether, after the dedesignations proposed in Alternative 2, there is enough designated agricultural lands of long-term commercial significance “sufficient to maintain and enhance the economic viability of the agricultural industry in the county over the long term; and to retain supporting agricultural businesses, such as processors, farm suppliers, and equipment maintenance and repair facilities” as WAC 365-190-050(5) requires. This analysis needs to take into account that between 2017 and 2022, Clark County lost 34,699 acres of land in farms, a 38.24 percent decrease.¹²

Also, as our letter on the scope of the EIS documented, in 2023, the State Department of Commerce updated WAC 365-190-050(3)(c)(i) to provide that one of the factors to determine if an area has long-term commercial significance for agricultural lands is “[t]he classification of prime and unique farmland soils, and farmlands of statewide importance, as mapped by the Natural Resources Conservation Service[.]” Previously WAC 365-190-050(3)(c)(i) did not include farmlands of statewide importance. The EIS must also identify the adverse impacts of rural development and urban growth area expansions, if any, on prime farmland soils, unique farmland soils, and farmlands of statewide importance.

Comments on 3.8.2.3 Impact of Alternative 3 C. Resource Lands on p. 138.

The DEIS claims that the “transfer of land represents approximately 5 percent of the existing agricultural lands, and as such does not represent a substantial loss of resource lands.” The DEIS does not cite to any evidence or include any analysis supporting this conclusion. Further, just examining the percentage loss is the wrong standard for analyzing the loss of agricultural lands.

The Court of Appeals concluded that

[t]he principal GMA goal served by designating and conserving [agricultural resource lands] ARL is that of RCW 36.70A.020(8): to “[m]aintain and enhance natural resource-based industries, including productive ... agricultural ... industries.” This and related provisions evidence “a legislative mandate for the conservation of agricultural

¹² United States Department of Agriculture, National Agricultural Statistics Service, 2022 Census of Agriculture Washington State and County Data Volume 1 • Geographic Area Series • Part 47 AC-17-A-47 Chapter 2. County Data, Table 8. Farms, Land in Farms, Value of Land and Buildings, and Land Use: 2022 and 2017 pp. 283 -- 288 (April 2019) last accessed on March 26, 2025 at: https://www.nass.usda.gov/Publications/AgCensus/2022/Full_Report/Volume_1_Chapter_2_County_Level/Washington/ and enclosed at the link on the last page of this letter with the filename: “st53_2_008_008.pdf.”

land.” *King County*, 142 Wn.2d at 562, 14 P.3d 133. The purpose of ARL designation is further focused by WAC 365-190-050(5), which states that in the application of ARL designation criteria, “the process should result in designating an amount of [ARL] sufficient to maintain and enhance the economic viability of the agricultural industry in the county over the long term.”¹³

The EIS needs to analyze whether, after the dedesignations proposed in Alternative 3, there is enough designated agricultural lands of long-term commercial significance “sufficient to maintain and enhance the economic viability of the agricultural industry in the county over the long term; and to retain supporting agricultural businesses, such as processors, farm suppliers, and equipment maintenance and repair facilities” as WAC 365-190-050(5) requires. This analysis needs to take into account that between 2017 and 2022, Clark County lost 34,699 acres of land in farms, a 38.24 percent decrease.¹⁴

Comments on 3.8.3 Avoidance and Mitigation Measures C. Resource Lands on pp. 140 – 41.

DEIS on page 141 claims that: “While not prohibited, it is a goal of the GMA to prevent the unnecessary conversion of agricultural land to urban uses.” This sentence misstates the law. As the Washington State Supreme Court has held: “Once agricultural lands had been designated, the Act also required counties and cities to adopt development regulations to assure the conservation of the designated lands RCW 36.70A.060(1). The County was required *to assure the conservation of agricultural lands and to assure that the use of adjacent lands does not interfere with their continued use for the production of food or agricultural products.*¹⁵ The lands the DEIS is analyzing are designated agricultural lands of long-term commercial significance. RCW 36.70A.060(1) is a requirement, not a goal. As long as they maintain that designation Clark County is required “*to assure the conservation of agricultural lands and to assure that the use of adjacent lands does not interfere with their continued use for the production of food or agricultural*

¹³ *Concerned Friends of Ferry Cnty. v. Ferry Cnty.*, 191 Wn. App. 803, 831–32, 365 P.3d 207, 221 (2015).

¹⁴ United States Department of Agriculture, National Agricultural Statistics Service, 2022 Census of Agriculture Washington State and County Data Volume 1 • Geographic Area Series • Part 47 AC-17-A-47 Chapter 2. County Data, Table 8. Farms, Land in Farms, Value of Land and Buildings, and Land Use: 2022 and 2017 pp. 283 -- 288 (April 2019).

¹⁵ *King County v. Central Puget Sound Growth Management Hearings Bd. (Soccer Fields)*, 142 Wn.2d 543, 556, 14 P.3d 133, 140 (2000) emphasis in original.

*products.*¹⁶ The EIS needs to correct this error of law and redo the analysis taking the correct legal standards into account.

As the above quote indicates, counties and cities cannot “choose to avoid converting agriculture lands to a non-resource, urban designation ...” as the DEIS implies on page 141. Avoiding converting agricultural lands of long-term commercial significance is a requirement of state law.¹⁷ Again, the analysis must be redone to comply with state law. An EIS that misstates state law is inadequate. As the Washington State Supreme Court has held: “The test to be applied is “whether the environmental effects of the proposed action and reasonable alternatives are sufficiently disclosed, discussed and that they are substantiated by supportive opinion and data.” *Leschi v. Highway Comm'n, supra* at 286, 525 P.2d at 785.”¹⁸ The supportive opinion must be correct.

Comments on 3.9.2 Significant Environmental Impacts, A. Travel Demand Forecasting pp. 150 – 51.

Studies show that increases in density reduce per capita vehicle miles traveled.¹⁹ This effect tends to be more pronounced in higher density areas with lower density areas experiencing less reduction in per capita vehicle miles traveled although density still reduces per capita vehicle miles traveled.²⁰ Dispersed employment also tends to increase per capita vehicle miles traveled and increasing employment density in smaller, lower density communities can increase per capita vehicle miles travel.²¹

¹⁶ *King County v. Central Puget Sound Growth Management Hearings Bd. (Soccer Fields)*, 142 Wn.2d 543, 556, 14 P.3d 133, 140 (2000) emphasis in original.

¹⁷ *King County v. Central Puget Sound Growth Management Hearings Bd. (Soccer Fields)*, 142 Wn.2d 543, 556, 14 P.3d 133, 140 (2000).

¹⁸ *Ullock v. City of Bremerton*, 17 Wn. App. 573, 580, 565 P.2d 1179, 1184 (1977).

¹⁹ Lei Zhang, Jinhyun Hong, Arefeh Nasri, Qing Shen, *How built environment affects travel behavior: A comparative analysis of the connections between land use and vehicle miles traveled in US cities* 5 *The Journal of Transport and Land Use* 40, pp. 45 – 47 (2012) last accessed on Nov. 26, 2025, at: <https://www.jtlu.org/index.php/jtlu/article/view/266> and at the link on the last page of this letter with the filename: “john_barneson,+Journal+manager,+Article4.pdf.” The *Journal of Transport and Land Use* is peer-reviewed. *Journal of Transport and Land Use* Submissions webpage last accessed on Nov. 26, 2025, at: <https://jtlu.org/index.php/jtlu/about/submissions> and at the link on the last page of the letter with the filename: “Submissions _ Journal of Transport and Land Use.pdf.”

²⁰ *Id.* p. 47.

²¹ *Id.* pp. 74 – 48.



Given these findings, it was surprising to see that Alternatives 2 and 3 have lower vehicle miles traveled and lower vehicle-hours traveled than Alternative 1.²² If we understand the DEIS correctly, all three alternatives have the same population and employment targets.²³ Alternatives 2 and 3 apparently do have density increases to accommodate housing affordable to households earning 80 percent or less of the county median income which would tend to decrease per capita vehicle miles traveled.²⁴ But Alternatives 2 and 3 include urban growth area expansions, dedesignations of agricultural lands, and for Alternative 3 rural upzones.²⁵ These changes will tend to spread the same population and employment over a larger area and increase per capita vehicle miles traveled. These changes seem inconsistent with the modeling and should be explained.

RCW 36.70A.070(9)(d)(i)(B) provides:

(d)(i) The greenhouse gas emissions reduction subelement of the comprehensive plan, and its related development regulations, must identify the actions the jurisdiction will take during the planning cycle consistent with the guidelines published by the department pursuant to RCW 70A.45.120 that will:

....

(B) Result in reductions in per capita vehicle miles traveled within the jurisdiction but without increasing greenhouse gas emissions elsewhere in the state[.]

However, the DEIS does not compare the per capita vehicle miles traveled for the alternatives and against the current per capita vehicle miles traveled. Since the comprehensive plan needs to reduce per capita vehicle miles traveled, it is necessary to document if that can be achieved by any alternative.

Comments on 3.10.2 Significant Environmental Impacts D. Water Supply and Sewer Services pp. 192 –95.

²² Draft Environmental Impact Statement for the Updated Comprehensive Growth Management Plans of Clark County, Battle Ground, Camas, La Center, Ridgefield, Washougal, Woodland and Yacolt p. 151 (October 1, 2025).

²³ *Id.* p. 1, pp. 16 – 17.

²⁴ *Id.*

²⁵ *Id.*



Re: Comments on the Draft Environmental Impact Statement for the Updated Comprehensive Growth Management Plans

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All of Washington's water is already allocated to a water user. According to Ria Berns, who manages the Washington State Department of Ecology's Water Resources Program, "[e]ven when there is enough snowpack and enough water flowing through Washington's rivers and streams, it's all spoken for"²⁶ While the DEIS estimated public water demand by alternative, it does not address whether these water systems have sufficient water rights to meet the demand. This is an important issue given the lack of available water in the State and also Clark County.²⁷

Futurewise also supports the comments on the EIS by the Friends of Clark County.

Thank you for considering our comments. If you require additional information, please contact me at email: tim@futurewise.org.

Very Truly Yours,



Tim Trohimovich, WSBA No. 22367
Director of Planning & Law

Enclosures at this link:

https://futurewiseorg.sharepoint.com/:f:/g/Ejq9oY4Toe9Ase5mwxoJlOYBDu_z8qLl2hfw97vIQ1mh5A?e=3brYRI

²⁶ Conrad Swanson, *Trump keeps talking about taking PNW water – is that possible?* The Seattle Times (Updated Feb. 23, 2025 at 7:00 am) last accessed on Nov. 26, 2025, at: <https://www.seattletimes.com/seattle-news/climate-lab/trump-keeps-talking-about-taking-pnw-water-is-that-possible/> and at the link on the last page of this letter with the filename: "Trump keeps talking about taking PNW water is that possible.pdf."

²⁷ State of Washington Department of Ecology, Water Resources Program, *WRIA 26 Cowlitz Watershed Water Availability* p. 3 (Publication 20-11-026 Oct. 2023); State of Washington Department of Ecology, Water Resources Program, *WRIA 27 Lewis Watershed Water Availability* p. 3 (Publication 20-11-027 Sept. 2023); State of Washington Department of Ecology, Water Resources Program, *WRIA 28 Salmon-Washougal Watershed Water Availability* p. 3 (Publication 20-11-028 Sept. 2023).