

From: [Jeffrey Delapena](#)
To: lconaway50@aol.com; [Cnty 2025 Comp Plan](#)
Cc: [Oliver Orjiako](#); [Jose Alvarez](#); [Jenna Kay](#)
Subject: RE: County 2025 Draft EIS
Date: Monday, December 1, 2025 11:20:24 AM
Attachments: [Comments SEPA 2025.docx](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Linda,

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

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



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Cc: [Sue Marshall](mailto:Sue.Marshall@clark.wa.gov) <Sue.Marshall@clark.wa.gov>; [Wil Fuentes](mailto:Wil.Fuentes@clark.wa.gov) <Wil.Fuentes@clark.wa.gov>; [Matt Little](mailto:Matt.Little@clark.wa.gov) <Matt.Little@clark.wa.gov>
Subject: County 2025 Draft EIS

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Please see attached.

I represent Northwest Wild Fish Rescue (NWWFR). We are submitting the following comments on the draft of the SEPA environmental impact statement as promulgated by Community Planning to Clark County on October 1, 2025. We may submit other comments as the process continues to update the Growth Management Plan. We have chosen to comment now on two elements that we feel we are the most familiar with based on our history of work in Clark County as well as our overall history of environmental concerns. These are water and animal and plant resources. As articulated below and based on our review of the draft of the SEPA environmental impact statement, Northwest Wild Fish Rescue supports Alternative 1 of the existing alternatives.

There are some overriding concerns that need to be factored in to any growth management plan. What is the level of growth that is sustainable given the environment in which we live? Every environment has a carrying capacity which defines how many resources are available to sustain life. For now, we have adequate resources available to sustain our population. But what if the supply chain for food is broken again, will we have protected enough agricultural land so we can still feed our population. If increasing drought in the summer draws down our water supplies, what measures can we take proactively to conserve them? And how will we counteract the effects of overcrowding in urban environments (increased crime/violence, more air pollution, more impervious surfaces, increased levels of anxiety/depression).

Northwest Wild Fish Rescue believes that any update of the Growth Management Plan must address these primary concerns as well as specific areas.

WATER

Northwest Wild Fish Rescue has worked for approximately 20 years in Clark County to protect wild fish including coho and steelhead, both of which are struggling to survive. We have worked extensively in Mill Creek, Mason Creek and Salmon Creek. (For some reason Mason Creek is not listed on Table 27.) As you are aware, fish are struggling due to a combination of factors, including decreasing amounts of water during the summer due to lower precipitation rates, illegal water withdrawals, increased pollution, higher water temperatures, increased demands for water due to increased population. While salmon bearing streams are protected under county code and state and Federal law, there are proposals at the Federal level to remove protections for endangered fish as well as other endangered species. If this were to occur then the responsibility to protect these fish and the water they need to survive will fall on state and local entities. Battle Ground's proposal to expand to the Dollars Corner area will specifically affect Mill Creek. This creek is already struggling with several sources of probable pollution which have not been remedied.

Code enforcement is hamstrung at this time due to lack of sufficient personnel and lack of

funds. To add to this burden with increased responsibilities is not realistic. As you are well aware, budgets and revenue sources are decreasing not through need but through economic factors. These pressures are not likely to change soon. So mitigation of growth impacts is likely to be less available than in the past.

Increasing impervious areas through increased urban development will only increase run-off, pollution, etc. It will impact groundwater quantity as well as quality. Some mitigation of these effects might lie in better building practices such as using permeable building materials, increasing green space requirements in developments, etc. Alternative 1 would “reduce the risk of impacts to groundwater quantity and quality” compared to Alternatives 2 and 3. Alternative 1 would also reduce the impact to critical aquifer recharge areas as compared to Alternatives 2 and 3.

FISH AND WILDLIFE HABITAT

We are blessed to live in a unique and beautiful area. In Clark county, we have runs of endangered salmon/steelhead. These fish face many threats including loss of suitable habitat, decreasing water, overfishing, increasing pollution, etc. It is estimated that “these populations are less than 10 percent of their original size”. “The Lower Columbia region now has the largest number of salmon and steelhead runs in the state of Washington listed or proposed for listing under the ESA. The sizes of the runs have decreased from millions to thousands or hundreds depending on the stream. It is worth noting that these fish spawn in the creeks and tributaries not large rivers as do chinook. This makes it even more important to protect the creeks where these fish return to spawn.

While these fish are resilient, they do have limits to their ability to survive further environmental degradation. It is incumbent on us to protect their habitat. Expanded urban growth would degrade their ability to survive even further. We support Alternative 1 as a result.

Northwest Wild Fish Rescue believes that it is premature to expand the UGA at this time. We believe that we need to build smarter and to protect our environment in better and more effective ways. We believe that Alternative 1 would have the least detrimental environment impacts.