

From: [Jeffrey Delapena](#)
To: "conservation@vancouveraudubon.org"
Cc: [Oliver Orjiako](#); [Jose Alvarez](#); [Rebecca Messinger](#)
Subject: RE: Comments Re: Clark County Comprehensive Plan Preferred Alternative
Date: Monday, January 5, 2026 12:00:00 PM
Attachments: [Clark County Growth Management Plan Agricultural Lands Comments_VAS_1-5-2026.pdf](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Susan,

Thank you for providing the Vancouver Audubon Society's feedback ahead of the Joint Hearing to select the Preferred Land Use Alternative for the 2025 Comprehensive Plan Update.

I am forwarding to additional members of Staff. Your comments will be brought to the attention of the Planning Commission and Council ahead of the Hearing. This will also be added to the Index of Record.

Best,



Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558



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From: Susan Saul <conservation@vancouveraudubon.org>
Sent: Monday, January 5, 2026 11:58 AM
To: Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Subject: Comments Re: Clark County Comprehensive Plan Preferred Alternative

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Vancouver Audubon Society's comment letter regarding Clark County's Agricultural Lands is attached.

Susan Saul

Conservation Chair

conservation@vancouveraudubon.org





P.O. Box 1966
Vancouver, WA 98668-1966

January 5, 2026

Clark County Council
PO Box 9810
Vancouver, WA 98666-9810

Submitted electronically to Jeffrey.Delapena@clark.wa.gov

RE: Comprehensive Growth Management Plan

Dear Councilors:

The Vancouver Audubon Society is a non-profit chapter of the National Audubon Society with members in Clark, Skamania and Klickitat counties in Washington state. For 50 years, we have worked to protect birds and the places they need using science, advocacy, education, and on-the-ground conservation.

By "bending the bird curve," we are working to help halt, and ultimately reverse, the decline of birds across the Americas. Our members participate in community science efforts, including the annual Christmas Bird Count, the monthly Winter Raptor Count, and the annual Breeding Bird Survey, to collect data on local species presence and abundance to help scientists track population trends.

Our local communities share the same resources as our local birds so we are interested in the land use decisions made in the Clark County Comprehensive Growth Management Plan, particularly regarding agricultural lands.

From Vancouver Audubon's perspective, agricultural lands are important for birds as a source of food, cover and nesting habitat. Seasonal wetlands and fields along migration routes provide critical stopover and wintering grounds for waterfowl and other migratory birds, especially in western Washington's lowlands. In Clark County, agriculture lands provide essential bird habitat, particularly for migrating and wintering waterfowl (swans, geese and ducks) and sandhill cranes.

Farms are not just food producers but vital ecological partners, offering refuge and resources for birds, especially when managed with conservation in mind, benefiting both wildlife and agricultural sustainability. Farms can host surprising biodiversity, with diverse crops, farm size, and landscape features increasing bird density and variety,

Farms with a mix of crop and livestock operations, or those with more diverse landscapes including natural areas, tend to support higher bird density and diversity which can be beneficial to agriculture, too. For example, Northern Harriers are natural predators of rodents, which are common pests in agricultural fields. By feeding on these pests, they help in reducing crop damage and loss. Birds also help control insect populations that are harmful to crops, providing an important "agro-ecosystem service" for farmers.

Habitat loss through conversion, degradation and fragmentation has significantly altered the landscape for birds throughout Clark County, so we need to keep the existing agricultural lands in agricultural use.

The 2025 *Clark County Agricultural Lands Study* found that all currently designated agricultural lands provide long-term commercial significance to the agricultural industry. These lands represent a vital community resource to feed our growing population, provide local food security, protect climate change resiliency and maintain bird habitat, as well as protect the future of the farming industry and jobs in the agricultural sector.

The study also concluded that Clark County has additional incredibly high-quality soils in our rural areas that are not currently designated as agricultural lands but should be designated as required by state law. Importantly, the study also found that lands with agricultural designations are more likely to remain as large parcels and their owners more likely to take advantage of the current use tax deferral program, which make these lands even more agriculturally productive.

The de-designation of any agricultural land for unnecessary Urban Growth Area expansions would undermine the capability of our agricultural sector to rise to its highest levels of productivity and the conservation purpose of the agricultural land designations while also reducing our county's available bird habitat.

Therefore, Vancouver Audubon requests the Clark County Council to acknowledge that all the county's currently designated agricultural lands should maintain their agriculture designation and to designate additional agricultural lands in the county that have been found to meet the legal criteria.

Sincerely,

A handwritten signature in cursive script that reads "Susan M. Saul".

Susan Saul
Conservation Chair