

**From:** [Rebecca Messinger](#)  
**To:** [Sue Marshall](#); [Glen Yung](#); [Michelle Belkot](#); [Wil Fuentes](#); [Matt Little](#)  
**Cc:** [Oliver Orjiako](#); [Jose Alvarez](#); [Cnty 2025 Comp Plan](#)  
**Subject:** FW: Clark County Comp Plan Review Comments ---Richard Dyrland, Hydrologist  
**Date:** Thursday, January 15, 2026 12:38:07 PM  
**Attachments:** [Comp Plan Water Comments.pdf](#)  
[image001.png](#)  
**Importance:** High

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Councilors,

Please see the below email and attached comments from Mr. Dyrland.

Thank you.

Rebecca



**Rebecca Messinger**  
Clerk to the Council  
COUNTY MANAGER'S OFFICE

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**From:** RICHARD DYRLAND <toppacific2@msn.com>  
**Sent:** Thursday, January 15, 2026 12:07 PM  
**To:** Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>  
**Subject:** Clark County Comp Plan Review Comments ---Richard Dyrland, Hydrologist  
**Importance:** High

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Rebecca,

Please distribute my attached comments on the Clark County Comp Plan draft & hearings to the County Councilors and Planning Staffs, and County Mgr. They particularly focus on water

related issues

Thank you,

Richard Dyrland

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**R. Dyrland COMP-PLAN COMMENTS- FOCUS ON WATER OVERSITES 1-15-2026**

**My name is Richard Dyrland, I am retired and have lived in Clark Co. WA in Ridgefield for 38 yrs. and during that time and before, worked as a Federal Regional Hydrologist in the Intermountain, Northwest, and California Regions of the US Govt. along with serving 5 years in WA DC.**

**I support Alternative 1 – which is called the (No Action) alternative but should properly labeled the (Current Basic Program) using standard planning & economic nationwide criteria. Alternative -1 uses no expansions of the UGA’s as it meets local and state requirements for providing adequate housing options for all income strata as well as balancing housing growth with local jobs, water services and adequate transportation and roads support (Concurrency Compliance). The existing UGA expansion areas meet predicted time-period needs for Clark County.**

**However, after listening to the various presentations by the 6 or so population center cities of Clark County, I am concerned about the lack of existing or proposed UGA expansion discussions that would address current and impending Water issues with Surface & Groundwater and their Stormwater handling, retention, and recharge-infiltration components.**

**These concerns are supported by a series of scientific study reports by the WA Dept. of Ecology/Water Supply/Water Availability/Changes to Environmental Conditions published, starting in 2023 for the WRIA-27(Cowlitz, Lewis, Salmon-Washougal Watersheds) of the Lewis Watershed Complex.**

**Basically, they describe changing watershed functioning conditions as “Increasing demands for water over time, from ongoing population growth, agriculture, and other consumptive uses as well as associated land use practices, that have resulted in lower stream flows, higher stream temperatures and declining groundwater levels in some areas. These decreases have also impacted important resources for fisheries and general stream health.”**

**In addition, any expansion UGA boundaries will push farther out and some will incur cumulative effects with larger tradeoffs (both social, economic, and environmental) that must be evaluated and discussed thoroughly.**

**It is not enough to just state “WE WILL MITIGATE THESE EFFECTS,” because experience and monitoring afterward has shown that certain types of water issues have a long record of being one of the un-mitigatable actions. Some types of impacts and tradeoffs cannot be effectively mitigated even when the mitigation is in the same watershed. And, trying to mitigate in a whole different watershed, especially when threatened & endangered (T&E) adult salmon and fry habitat, or groundwater infiltration is involved, ---has effectiveness problems.**

**For example, in the current Comp Plan proposed Alternative-2 for the City of Battle Ground, the expansion west up Hwy-502 towards Dollars Corner is also the location of the headwaters of Mill Creek North, which has extensive T&E salmon production for the East Fork Lewis River System. Protecting this water related resource was not even mentioned in the Battle Ground presentation.**

**The WA State & GMA Concurrency laws such as WAC 365-196-840 and WAC RCW 36.70A-095 and others, which cover water, sewer, and road construction before any housing or commercial development starts, need better compliance within the current Urban Growth Boundaries as well as those proposed in Comp Plan Alternatives 1, 2 & 3. Examples of inadequate compliance are 179<sup>th</sup> St. in North Vancouver and NW Pioneer Street in Ridgefield.**

**In closing, I urge the Clark County Councilors and Planning Staffs to review the Futurewise comments and analysis of the Draft EIS for the Comp Plan Update that was sent to you on December 1, 2025. It contains discussions related to water and other Plan components along with extensive data and information references.**

**I support the comments made by both Futurewise and FOCC that Alternatives 2 & 3 are not needed.**

**Thank You.**