

From: [Jeffrey Delapena](#)
To: conservation@vancouveraudubon.org
Cc: [Oliver Orjiako](#); [Jose Alvarez](#); [Rebecca Messinger](#)
Subject: RE: Clark County Comprehensive Plan Update Preferred Alternative Comments
Date: Friday, April 17, 2026 1:02:00 PM
Attachments: [Clark County Comprehensive Plan Preferred Alternative 4-17-2026.pdf](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Susan,

Thank you for providing the Vancouver Audubon Society's comments regarding the Council Hearing to select the Preferred Alternative for the 2025 Comprehensive Plan.

I am forwarding to additional members of Staff, including the Council's office ahead of the Apr. 27th Hearing. This will also be added to the Index of Record.

Best regards,



Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558



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From: Susan Saul <conservation@vancouveraudubon.org>
Sent: Friday, April 17, 2026 11:45 AM
To: Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Subject: Clark County Comprehensive Plan Update Preferred Alternative Comments

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.

The comment letter from the Vancouver Audubon Society is attached.

Susan Saul

Conservation Chair

conservation@vancouveraudubon.org





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

April 17, 2026

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

submitted via email to Jeffrey.Delapena@clark.wa.gov

Re: Clark County Comprehensive Growth Management Plan Update Preferred Alternative

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.

We support Alternative 1. The Preferred Alternative should reflect the Clark County Council's prior decisions that forecast growth for housing, population, and employment can be accommodated within current Urban Growth Areas (UGA), meaning there is no legal reason to expand UGAs. Alternative 1 is the only alternative that does not expand UGAs.

The hundreds of acres that Ridgefield, La Center, and Camas are requesting to add to their UGAs are designated prime agricultural lands and farmlands of statewide importance. Battle Ground's proposed UGA expansion would convert hundreds of acres of agriculture quality rural lands identified in the Agricultural Lands Study. These agricultural lands represent an invaluable community resource as we consider the need to feed our growing population, provide local food security and climate change resiliency, and the support the future of the farming industry and jobs in the agricultural sector as a whole.

The Council should honor the recommendations of the Agricultural Advisory Commission, which voted to maintain all existing agricultural designations and requested a moratorium on upzoning of lands that meet the legal criteria for agricultural designation. To use encroaching development as a justification to place land in UGAs will continue to chip away at the amount of agricultural land, which goes against the conservation purpose of the agricultural land designations.

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.

Clark County must match the City of Vancouver's Greenhouse Gas Emission Goals. The Preferred Alternative should adopt the recommendations of the Clark County Climate Community Advisory Group (CAG) for an explicit greenhouse gas reduction goal.

Bird conservation in a changing climate requires smart planning and bold action. The National Audubon Society's *Survival by Degrees* report found that two-thirds of North American birds are at risk of extinction from climate change. To bring birds back from a decline of three billion since 1970, we need to implement climate solutions, conserve natural resources, and build resilient communities. This means dramatically reducing carbon emissions and offsetting what we cannot eliminate. Adopting Vancouver's Climate Action Framework is an opportunity to address at the local level the multiple, ongoing challenges we and birds are facing, including the negative impacts to both bird and human health.

Sincerely,

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

Susan Saul
Conservation Chair