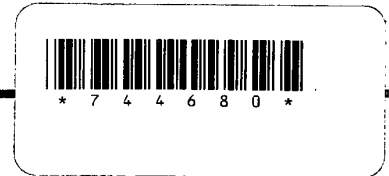


Schroader, Kathy



From: Gretchen Starke <gstarke@pacifier.com>
Sent: Tuesday, September 15, 2015 3:53 PM
To: Cnty 2016 Comp Plan
Subject: comments on the SDEIS for the update of the growth plan
Attachments: growth plan update, written comments, sept 2015.doc

Please accept these comments on the SDEIS for the update of the county growth management plan. Please make sure these are in the record. Thank you.

Gretchen Starke
Conservation Chair,
Vancouver Audubon Society

VANCOUVER AUDUBON SOCIETY

P.O. Box 1966 Vancouver, WA 98668-1966
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September 15, 2015

Community Planning
Comp Plan Comments
P.O. Box 9810
Vancouver WA 98666

**Subject: Comments on the Update of the County Growth Management
Plan and the SDEIS**

ATTN: Oliver Orjiako

Dear Mr. Orjiako:

Please accept these comments for the record.

I am the conservation chair of the Vancouver Audubon Society. The Audubon Society works on behalf of birds and other wildlife. Because growth has a profound effect on wildlife and habitat, we have been long concerned about planning in this county. We appreciate the opportunity to comment on the proposed alternatives to the plan and on the SDEIS. The first part of these comments are an expansion of the testimony I made before the joint planning commission and county council hearing on September 10.

The Vancouver Audubon supports Alternative 1 and opposes Alternative 4. There are many reasons to oppose Alternative 4. It promotes sprawl of a kind that is neither strictly urban nor actually rural, but is a kind of bastard combination of the two with the worst qualities of each and with few of the amenities of either. There would be the traffic congestion of urban areas and the distance from public and private services, such as grocery stores, of rural areas. Alternative 4 will cost the taxpayer a bundle of money providing public services to the newcomers. Either that, or the public services for the rest of us will deteriorate as scarce public dollars stretch in an effort to provide services to people spread out all over the county.

Alternative 4 will put a strain on water resources. Alternative 4 will promote more pollution from cars because it will be difficult, if not impossible, to provide C-Tran services to such a scattered population and the new residents will have to use their cars. Alternative 4 will hem in the cities, hampering their orderly growth. Alternative 4 will reduce the ability of the county to attract large employers, those that would need large tracts of land.

I could go on. Alternative 1, on the other hand, does not do those things. Alternative 1 provides for plenty of room to grow, to house the new population, to allow for support facilities such as stores and restaurants, offices and schools, all without putting undue pressure on the taxpayer.

But, Vancouver Audubon's main interest is in birds and wildlife. The SDEIS makes it very clear that, of all the alternatives, Alternative 4 has the greatest impact on fish and wildlife. This is because of the probable more intensive development of 65,500 acres of land, across most of the drainage basins. On the map, you can see the band of land proposed for upzoning going from the south to the north. Forest and field habitat will be converted to houses and lawns, neither of which is suitable for most wildlife. As each parcel is developed (and of course, they will be developed -- otherwise, why are we all going through this exercise?), the wild animals, such as birds, will be displaced to nearby parcels. The problem is that, if the parcel is already occupied by another pair of birds of the same species, the newcomers will be driven out. A pair of birds are territorial -- they defend their nesting area and the resources within. Otherwise, they cannot succeed in raising their chicks. The birds who lose their habitat will not reproduce and they will eventually die. The population of that species will decline and they will be replaced by species that are more comfortable living with human habitation -- species such as starlings and crows, for example. As more and more parcels are developed, less and less habitat will remain.

There is the problem of fragmentation. Breaking habitat up into pieces makes it less suitable for wildlife. Each species has its own requirements. Take as an example, warblers. Most species of warblers nest in forested areas. Warblers are subject to nest parasitism, that is, other birds, such as cowbirds, lay their eggs in the warblers' nest. The cowbird chicks hatch first and are the most aggressive in demanding food from the parents. Often, the cowbird chick will kick the warbler chick out of the nest. But, warblers nest deep in the woods. Cowbirds don't like going deep into the woods. If the woods are broken up by development, the cowbirds can easily reach the warblers' nest. Alternative 4 will break up a lot of woods.

More intensive development adversely affects fish, especially salmon. Salmon require cold, clean water. More intensive development introduces silt and other pollutants into the streams. As streamside vegetation is removed, the water heats up because of the lack of shade. The salmon become more stressed and may not make it to spawning time.

More intensive development resulting from upzoning disrupts migration corridors for both aquatic and terrestrial species. An animal moving along a stream corridor through the woods will suddenly confront an expanse of lawn or a building. Its migration is then disrupted.

But, the SDEIS offers a grain of hope. There is such a thing as mitigation. The county could take measures to mitigate for the harm done to wildlife by Alternative 4. The SDEIS

specifically mentioned the Conservation Futures Program, a program in which the county, through various grants and funding from a number of sources, buys land for recreation, open spaces, and conservation purposes. Indeed, if thoughtfully implemented, Conservation Futures could help offset to some extent, the harmful effects of Alternative 4 on fish and wildlife. Strategic purchases of land or development rights could help maintain migration corridors, could reduce somewhat fragmentation. The problem is, is that mitigation is not required. There is no evidence that the present board of councilors (let alone considering what any future board might do) would even consider an attempt to mitigate the development resulting from Alternative 4, or any of the alternatives. In fact, at least one of the councilors, Councilor Meilke has exhibited evidence that he is hostile to the Conservation Futures Program. Councilor Madore has supported Mielke in this. Just recently, Mielke and Madore voted to start the process of selling land purchased through the program, land that has upland habitat near the Lewis River. Upland habitat is becoming more and more scarce in Clark County.

If the county chooses Alternative 4 as the preferred alternative, and if that choice withstands challenges (no sure thing), and if the board of councilors continues to attack the Conservation Futures Program, fish and wildlife have an uncertain future in Clark County.

I'd also like to point out that there are no mistakes in the current plan concerning lot size. There is a difference between tax lots and legal buildable lots. And neither the federal nor the state constitutions guarantee a return on investment or a right to maximize income on property.

The following are further comments on the SDEIS document itself:

1. While I realize it is a supplemental EIS and relies on the EIS for the current plan and while I understand that time was short, it still is a skimpy document, especially in considering the impact of the various alternatives on fish and wildlife. I would have especially appreciated more detailed analysis of Alternative 4's increasing the fragmentation of habitat and breaking up of migration corridors, especially on species such as warblers. It would also have been useful to have some discussion of what areas of the county would be more impacted, that is, which stream corridors that are presently relatively intact would be fragmented.
2. I did not see that the issue of wildfire was addressed at all. If it was, I missed it when looking through the SDEIS. As the climate changes because of global warming, we can expect summers to be warmer and dryer. As this summer should have told us, wildfire is becoming more and more an issue that we need to pay attention to. One of the adverse consequences of climate change in the Pacific Northwest will be an increase in wildfire (Climate Change, EPA). Because Alternative 4 provides for a greater increase in lots and homes in the wooded areas of the county -- what land managers call the urban-forest interface -- will increase the risk of wildfire. Further, the increased presence of homes, would increase the difficulty -- and danger -- the fire fighters would have in controlling the fire. For this reason alone, Alternative 4 should be rejected.

3. Two of the numbers in the table on page 3-13 make no sense. It appears that the computer adding a couple of columns made a serious mistake. The subtotal for agriculture is given as **9,94518,690 acres** when I think that the number, 18,690, is the number intended and the subtotal for forest is given as **13,11238,897** when I think the number, when I think that **38,897** is the intended number.

Thank you.

Sincerely,

Gretchen Starke
Conservation Chair,
Vancouver Audubon Society