Hello,

Attached you will find the comment letter from Washington Dept. of Fish & Wildlife regarding the Clark County Draft Supplemental Environmental Impact Statement, as part of the 2016 Comprehensive Growth Management Plan Update.

Thank you for your time and consideration of these recommendations.

Sincerely,
Emelie McKain

Emelie McKain
Region 5 Assistant Regional Habitat Program Manager
2108 Grand Blvd. Vancouver, WA 98661
Emelie.mckain@dfw.wa.gov
O: 360.906.6764 | M: 360-401-5317
September 16, 2015

Clark County Community Planning
Attn: 2016 Comp. Plan Record
PO Box 9810, Vancouver WA 98666

RE: WDFW Comments on 2nd REVISED Comprehensive Plan Draft Supplemental EIS Available for Review

Dear Mr. Orjiako,

Thank you for the opportunity to comment on the proposed August 2015 Draft Supplemental Environmental Impact Statement relating to the Clark County 2016 Comprehensive Growth Management Plan Update. The Washington Department of Fish and Wildlife (WDFW) believes that the county has done a good job creating viable growth options that balance the varied and complex needs of the county, its residents and fish and wildlife. We offer comments in the hope to find a solution that best meets county growth and conservation goals. Washington Department of Fish & Wildlife recommends adopting Alternative 3 and adjusting the Urban Growth Areas by a more appropriate amount than outlined in the 2007 EIS.

It is our understanding that the proposed Alternative 3 creates the best potential scenario for the success of fish and wildlife in the county. In addition, the new projected county growth rates along with the availability and productivity of suitable fish and wildlife habitat are unlike previously assessed rates in 2007, therefore giving way to a more appropriate growth plan.

Alternative 3 will bring an additional 78 acres of valuable fish and wildlife habitat conservation areas into potentially developable areas\(^1\). This amount of disturbed habitat is significantly less than Alternatives 2 & 4 which at a maximum provide 65,500 acres for potential development\(^1\). Fish and wildlife would likely experience negative effects from more intensive development within UGA expansion areas such as habitat fragmentation, loss of native vegetation, increased noise and light disturbance and increased stormwater pollution. While these negative effects are not ideal, mitigation can occur on a project basis to minimize the cumulative damage to watersheds and larger habitat areas.

In addition, this alternative takes into account the complexities of collaborative planning; the socioeconomic and residential needs of the county are nicely balanced with the needs of fish and wildlife by emphasizing development to fill in existing urban areas. This alternative promotes the

\(^1\) 2016ClarkCountyCompPlanDraftSEISSearch.pdf
build out of existing UGA boundaries instead of classifying high quality habitat in rural and forested areas into more easily developed zoning classes as proposed in Alternatives 2 & 4. This strategy promotes the integrity of high quality habitat as well as high functioning rural land.

Washington Department of Fish and Wildlife endorses the proposed Alternative 3 to the Clark County 2016 Comprehensive Plan Update. We also offer to collaborate on crafting approaches to development and future land use. WDFW is always available for questions regarding the above comments and is open to meeting with the county to discuss further options. Our agency greatly values our cooperative relationship with the county and respects the efforts made to find the right balance between many separate complex factors in regards to drafting the 2016 Comprehensive Growth Management Plan.

Again, we thank you for the opportunity to provide input on the Draft Supplemental Environmental Impact Statement. Please contact me should you have questions or need additional information.

Sincerely,

[Signature]

Emelie McKain
Region 5 Assistant Regional Habitat Program Manager
Washington Department of Fish & Wildlife
2108 Grand Blvd. Vancouver, WA 98661
Emelie.mckain@dfw.wa.gov
360.906.6764

cc: Dave Howe, WDFW Region 5 Habitat Program Manager
    Kevin Tyler, Clark County Resource Enhancement and Permitting Manager
    Keith Folkerts, WDFW Land Use Policy Lead