

May 17<sup>th</sup>, 2016

Dyrland P-1

To: Clark County Councilors, Clark County WA.

Subject: Review of FEIS done for GMA-Preferred Alternative Process.



From: Richard Dyrland, Supervisory Federal Hydrologist, semi-retired

Dear Councilors,

I have reviewed the online version of the Final Supplemental EIS which is on the Clark County web site, with particular emphasis on the Water Resources and Fish & Wildlife Resources chapters.

Developing and reviewing an EIS is an activity that I am well experienced in since I have done this at both the regional and national level, including 17 EIS covering millions of acres of land and a wide range of complexities in Oregon and Washington.

**My evaluation of the FSEIS is that is not a strong document and it gives you very little substantive analysis on the impacts of alternatives as found in the "Options & Impacts (Alternatives)" document** That lack of in depth valid qualitative analysis of impacts, whether the impacts are direct, indirect, cumulative, induced, or connected actions ---does not provide much help in reaching the decisions that you & others must make.

The FEIS has lots of standard generic content common to almost all EIS documents, including a range of inventory data with much of it in map display format. It goes into extensive discussion of protective regulations and codes and compliance, followed by a series of mostly qualitative, again almost generic statements about impacts. What is lacking or very weak, is a real systematic analysis applied to the data and information available, which addresses the characteristics and condition of the resources in the County in relation to how they will be expected to respond under the Preferred Alternative.

In regard to the Water Chapter, supply is discussed but groundwater is hardly mentioned. It uses a general statement from the WA Dept. of Ecology that implies that we have several aquifers to draw from and so there is no need for concern.

This is not a valid statement as we already have aquifer problems, particularly with declining infiltration/recharge rates. The impact of this is manifested in local streamflow patterns that are shifting to reflect the groundwater inflow problems now occurring during critical summer flow period. These changing water conditions also have very detrimental impacts on fish and wildlife populations, and in particular the "Threatened & Endangered Species" located in the County. Also, there is an increasing number of wells that are growing dry and reflect this groundwater management problem. The abuse of wetlands and the related impacts are also not properly addressed and the situation is about the same as the deficiencies with water.

Councilors, you need a more substantive evaluation of these impacts within the major sub-basins in the County to see what impacts & associated risks the potential changes in land parcels and their different uses are likely to create. Simplistic general statements of "mitigation will take care of it" are just not realistic or valid. It seldom works, and particularly with water related concerns.

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The Fish & Wildlife chapter from "Options & Impacts (Alternatives)" of the FEIS repeats the same deficiencies as was previously stated regarding the chapter on water.

Many of the streams in Clark County have stream reaches that are degraded and some quite severely. Proper stream functioning is a problem and there is limited habitat in some critical stream reaches. Just acquiring land adjacent to streams is not an adequate solution, more stream & fish habitat restoration is needed along with real protection of streambank and riparian areas from now impacted by existing buildings and continued allowance of more construction. In particular the more recent recognition of the high value of smaller tributary streams and their sub-watersheds has not been properly addressed.

Here again the "crutch" of mitigation is used when it is common knowledge that it is not working very well and that prevention and proper restoration can produce effective results.

If we do not take more effective steps to help in addressing the "T&E" stream problems in particular, we could slide into an "Endangered Listing" situation. This would result in a drastic change on how we can interact with streams and riparian areas, none of which is desirable. This is already beginning to potentially happen in the Puget Sound area to the north where salmonid fish and other marine populations are crashing.

The Wildlife Component of Chapter-4 is somewhat better developed but again, more specific protection is needs to be built into the Alternatives and land changes that are likely to induce high impacts should not be allowed. And again, mitigation is not a "magic bullet" and there has been a pattern of improper use in Clark County in order to allow building and development in areas where there is a high impact ---the mitigation is not compensating for both the short-term and long-term impacts of these actions and the additive cumulative effects are of growing concern.

I hope this information and analysis of the DEIS will be helpful in the challenging task of developing decisions that will continue to make Clark County a great place to live.

Respectfully,



Richard Dyrland

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## Schroader, Kathy

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**From:** Orjiako, Oliver  
**Sent:** Wednesday, May 18, 2016 4:38 PM  
**To:** Albrecht, Gary, Alvarez, Jose, Anderson, Colete, Euler, Gordon, Hermen, Matt, Kamp, Jacqueline, Lebowsky, Laurie, Lumbantobing, Sharon, Orjiako, Oliver, Schroader, Kathy, Wisner, Sonja  
**Subject:** FW: Comp Plan Testimony (5/17/16 BOCC hearing)  
**Attachments:** 051716\_CompPlanComments\_Carol\_Levanen.pdf, 051716\_CompPlanComments\_Sydney\_Reisbick.pdf, 051716\_CompPlanComments\_Susan\_Rasmussen.pdf, 051716\_CompPlanComments\_Richard\_Dryland.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

FYI and for the record Thanks

-----Original Message-----

From: Tilton, Rebecca  
Sent: Wednesday, May 18, 2016 2:39 PM  
To: Orjiako, Oliver, Schroader, Kathy  
Subject: Comp Plan Testimony (5/17/16 BOCC hearing)

Hello,

Please see the attached comments, which were submitted at the board's hearing yesterday (during public comment)

Thanks!  
Rebecca

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