



Schroader, Kathy

From: Mckain, Emelie L (DFW) <Emelie.Mckain@dfw.wa.gov>
Sent: Wednesday, October 21, 2015 10:46 AM
To: Wisner, Sonja; Schroader, Kathy
Cc: Howe, David L (DFW); Folkerts, Keith E (DFW); Tyler, Kevin
Subject: Clark County RILB Comments -WDFW
Attachments: Rural_Industrial_Land_Bank_Comments_WDFW_2015.pdf

Hello,

Attached you will find the comment letter from Washington Dept. of Fish & Wildlife regarding the Clark County Rural Industrial Land Bank Programmatic Environmental Review Addendum

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





State of Washington
DEPARTMENT OF FISH AND WILDLIFE
Southwest Region 5 • 2108 Grand Boulevard, Vancouver, WA 98661
Telephone (360) 696-6211 • Fax (360) 906-6776

October 21, 2015

Oliver Orjiako
Clark County Community Planning
Attn: Rural Industrial Land Bank
PO Box 9810, Vancouver WA 98666

RE: WDFW Comments on Clark County Rural Industrial Land Bank Programmatic Environmental Review Addendum

Dear Mr Orjiako,

Thank you for the opportunity to comment on the proposed Clark County Rural Industrial Land Bank (RILB) Programmatic Environmental Review Addendum. The Washington Department of Fish and Wildlife (WDFW) has reviewed this RILB proposal and offers the following comments for your consideration.

In order to reduce potential impacts on fish and wildlife and their habitat, WDFW recommends the adoption of Site 1 as the Clark County RILB site. The five sites are diverse in offerings for the proposed RILB as well as potential impacts on direct and surrounding land parcels. The proposed industrial manufacturing and light commercial land use of this bank poses significant threat to viable fish and wildlife habitat and resources on all sites.

Site 1 has the least direct impacts on Priority Habitat and county critical areas, as well as the lowest direct impact on ESA listed species. With that said, the proposed Site 1 will still have a large direct and indirect impact on the natural landscape and species that occupy it. The presence of Oregon White Oak and several emergent wetlands as well as riparian priority habitat and mature forest lends to more strict classification of zoning in the area.

Along with the selection of Site 1 for the RILB, WDFW recommends strict site specific on and offsite mitigation of development for light to heavy industrial use in this bank. Site 1 is surrounded by priority riparian habitat and Salmon Creek, which holds several ESA listed species and provides many resources for fish and wildlife. The proposed site also includes a mature forest and White Oak priority habitat, which should be protected from future development on the site. A habitat specific appropriate buffer is recommended for any wetland encroachment from development as well as the forested area in the NE corner of Site 1.

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The west side of Site 1 houses a parcel that is currently under the proposed conservation acquisition area for Clark County. It is recommended that Site 1 is reduced in size to allow for the western parcel to be acquired for conservation purposes. The habitat value that parcel provides is vital to local fish and wildlife due to the advancement of urban and industrial development in the area.

WDFW is hopeful for the continued opportunity to work with the county and brainstorm creative approaches to habitat conservation and mitigation techniques for the newly established Rural Industrial Land Bank

Again, we thank you for the opportunity to provide input. Please contact me should you have any questions or need additional information

Sincerely,



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

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