



State of Washington
DEPARTMENT OF FISH AND WILDLIFE
Southwest Region 5 • 5525 South 11th St Ridgefield, WA 98642
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April 6, 2023

Bryan Snodgrass, Principal Planner
Vancouver Community and Economic Development
415 W 6th St
Vancouver, WA 98660

RE: Burnt Bridge Creek West Zone Change

Dear Mr. Snodgrass

Thank you for the opportunity to comment on the Burnt Bridge Creek West Zone Change. The Washington Department of Fish and Wildlife (WDFW) has reviewed the proposal and offers the following comments for your considerations.

WDFW is concerned that the proposed rezone and subsequent future development of the parcel will lead to unavoidable impacts on the priority Oregon white oak (OWO) woodland. WDFW recommends that the City of Vancouver explore other zoning options that reduces conflict between protecting the resource and reasonable use of property.

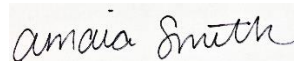
The *Proposed Burnt Bridge Creek West Zoning Map Designation Change* presentation presented by Bryan Snodgrass, Principal Planner for the City of Vancouver on March 14, 2023, indicates that a 275,000 square foot warehouse is proposed in the northern portion of this parcel tentative on zoning approval. We are concerned that changing the zoning to light industrial will not allow flexibility in avoiding impacts to the priority OWO woodland and the resulting development will degrade habitat. While we recognize the need for Light Industrial zoning and development, we do not believe this parcel is best suited to meet those needs. The OWO woodland within this parcel occupies approximately 27* of the 33 acres and is a part of a larger, contiguous OWO woodland that is approximately 41 acres*. Additionally, several acres of this contiguous oak stand are actively managed by the Terrace Oak Mitigation Bank. Stands this large are rare in Clark County and almost completely absent within the City of Vancouver. Because of the rare and valuable nature of the OWO woodland of this size, we recommend for the City of Vancouver to explore ways to keep this parcel as green space while encouraging industrial development on parcels that do not have significant conflict with priority habitats of this significance.

* Calculations are estimates based on WDFW PHS aerial imaging and have not been field verified.

If this zoning is approved, however, we recommend placing the southern portion of this parcel, outside of the proposed development footprint, into a conservation easement. A significant portion of the stand is located outside the proposed footprint and protecting it in an easement would prevent future development impacts that would be difficult, if not impossible, to mitigate for. We also request being consulted for the review of the compensatory mitigation plans prior to the City approving any development on this site. We are currently updating our recommendations for mitigating for Oregon white oaks and the best available science indicates mitigation is needed to offset the temporal loss of habitat *in addition to* the physical loss of trees. Based on this information, compensatory mitigation requirements will likely be greater than what has been required in previous development proposals. Due to the significant acreage of OWO woodland on site, the compensatory mitigation required will likely be complex and we want to ensure that any mitigation achieves no net loss of function.

Thank you for considering our recommendations to protect this priority habitat. We hope that the City gives special consideration to this property due to the size and location of this priority OWO woodland. Furthermore, we encourage the City to have additional conversation to determine the best use of this property, given the valuable habitat on site.

Sincerely,

A handwritten signature in cursive script that reads "Amaia Smith". The signature is written in black ink on a light-colored background.

Amaia Smith
Habitat Biologist,
Washington Dept of Fish and Wildlife
5525 South 11th St.
Ridgefield, WA 98642