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Development Consultant

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Rod Swanson  
Clark County Clean Water Division  
PO Box 9810  
Vancouver, WA 98666-9810  
[rod.swanson@clark.wa.gov](mailto:rod.swanson@clark.wa.gov)

**RE: DRAFT 2018 Clark County Stormwater Management Plan**

Dear Mr. Swanson:

Thank you for the opportunity to comment on the draft 2018 Clark County Stormwater Management Plan (SWMP). The Urban Greenspaces Institute works across the Portland-Vancouver metropolitan region to integrate greenspaces with the built environment. We engage with agencies, nonprofits, and the public on collaborative conservation initiatives and how to best leverage our limited public monies to achieve wildlife habitat connectivity, clean water, and public access to nature.

The County's SWMP and the associated capital projects list are important tools for communicating with the general public on how and where we spend our public monies to promote and safeguard clean water. We appreciate that many elements of the SWMP are required by State and federal rules. However, some aspects of the SWMP and capital list are the prerogative of County officials.

Historically, Clark County has focused its capital spending in urban and urbanizing areas, and has concentrated the majority of funds on stormwater facility retrofits to alleviate flooding and address clean water challenges. We understand that this geographic focus has been required by Washington Department of Ecology. Similarly, County road capital funds have been focused on unincorporated urban areas fringing the various cities. While this approach addresses many legitimate needs, it also neglects needed public improvements in the surrounding rural areas. In particular, it precludes the use of County stormwater and road capital funds to repair fish-blocking culverts at County road crossings in priority watersheds like the East Fork Lewis River, Cedar Creek, and Washougal River.

Other Washington counties like King and Kitsap counties have made significant investments of their stormwater (and road) capital funds on needed fish passage improvements/repairs at county-owned crossings. Local stormwater and road capital funds can provide crucial match for Salmon Recovery Funding Board restoration dollars.

We encourage Clark County Public Works Clean Water Division staff to consider incorporating priority fish passage repair/retrofits into the 2019-2024 stormwater capital plan. We recommend you consult with Washington Department of Fish and Wildlife and Lower Columbia Fish Recovery Board staff on this at the earliest stages. There are now a variety of tools and resources available to County staff to aid with pinpointing and prioritizing County-owned culverts that block fish passage. One of the best tools is the relatively new online WDFW fish passage map application:  
[https://wdfw.wa.gov/conservation/habitat/fish\\_passage/data\\_maps.html](https://wdfw.wa.gov/conservation/habitat/fish_passage/data_maps.html).

Using this tool, one can learn that at least 52 County-owned road crossings are complete barriers to fish passage and an additional 109 crossings represent partial barriers to fish passage. However, the current inventory of potential fish passage barriers in Clark County is incomplete, and many road crossings and other features have not been inspected. This includes many County-owned road crossings of anadromous fish habitat.

We look forward to working with you on these needed program improvements. We intend to raise this issue again as part of the annual update to the County's transportation improvement program. Congratulations on your updated SWMP and let's stay in touch on the important work ahead.

Sincerely,

A handwritten signature in black ink, appearing to read "Ted Labbe". The signature is fluid and cursive, with the first name "Ted" being the most prominent.

Ted Labbe  
UGI Policy/Program Director  
[ted.labbe@gmail.com](mailto:ted.labbe@gmail.com)  
503-758-9562

CC: Susan Wilson, Clark County Public Works  
Dave Howe, Washington Dept. of Fish and Wildlife  
Rian Sallee, Washington Dept. of Ecology  
Steve Manlow, Lower Columbia Fish Recovery Board