



State of Washington  
**DEPARTMENT OF FISH AND WILDLIFE**  
Southwest Region 5 • 5525 South 11<sup>th</sup> St Ridgefield, WA 98642  
Telephone: (360) 696-6211 • Fax: (360) 906-6776

September 13, 2022

Preston Pinkston  
Lewis County Community Development Department  
2025 NE Kresky Ave  
Chehalis, WA 98532

**RE: WDFW Comments on the proposed expansion of the UGA for City of Chehalis**

Dear Mr. Pinkston:

Thank you for the opportunity to comment on the **Chehalis Westlund-Enbody and Chehalis Breen UGA Expansion Proposals**. The Washington Department of Fish and Wildlife (WDFW) has reviewed this proposal and offers the following comments for your consideration.

WDFW would like to offer support for the County's requirement to protect the floodplain by applying a Conservation Easement to the floodplain portion of the properties in these proposals, should the proposals be approved. Based on experience over the past two decades, we know that damages to infrastructure, residences and businesses in the floodplain are inevitable, and can be avoided by preventing development of that kind in those habitats. In addition, avoiding development in floodplain habitats protects the riparian buffer and maintains a critical corridor for wildlife that migrate between the Cascades and the coast.

**However, we would encourage the City of Chehalis to step back from an expansion of the UGA at this time.** WDFW encourages compact development strategies and the maintenance of open space. Expansion of urban development leads to the fragmentation of wildlife habitat and negative effects on fish life and water quality through impacts to our wetlands, rivers and streams.

Habitat fragmentation negatively impacts species by creating small, isolated habitat patches of reduced quality for wildlife. While fragmentation happens on a site-by-site basis, its effect on wildlife is felt at the landscape scale. Creating fragmented habitat results in:

- a loss of habitat connectivity for species migration and dispersal,
- increased predation and harassment of wildlife by household pets,
- increased interactions with humans,
- increased opportunities for invasive species to penetrate important habitat areas

The best way to deal with impacts of fragmentation is to minimize and avoid them through careful planning. Maintaining large blocks of undeveloped habitat and protecting natural corridors such as forested riparian zones and ridgetops minimizes the effects of habitat loss. Allowing for large blocks of undeveloped land, and corridors between them, provides space for migrating animals to move across the environment with minimal interactions with humans and infrastructure. It also protects aquatic habitats by maintaining adequate forested buffers to provide shade and cooler water, filtering runoff before it reaches the stream, protecting aquifer recharge areas, and providing a self-sustaining source of large wood that is critical for habitat forming processes and the benefit of fish.

In closing, WDFW encourages the City of Chehalis to work toward compact development, fully realizing a need for expansion by developing the area already within the existing UGA. When expansion is necessary, we recommend focusing on adding space closer to the city limits. Developing within the existing boundaries of the current UGA will prevent irreparable impacts to fish and wildlife habitat, and to the natural resources that support a healthy community and their relationship to the outdoors in the Chehalis basin.

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

Sincerely,

*Karen Adams*

Karen Adams, Habitat Biologist  
Washington Department of Fish and Wildlife Habitat Program  
Karen.adams@wdfw.wa.gov, 360-906-6731

cc: Madeline Nolan, WDFW Region 5 Assistant Habitat Program Manager



## **SEPA Comments Memo**

File Number: SEP22-0031

Date Printed: September 14, 2022

---

### **BUILDING DEPARTMENT**

- Portions of this property are located in the mapped floodplain any proposed development in these areas will require floodplain development permits through Lewis County

### **PUBLIC WORKS**

- No comments

### **ENVIRONMENTAL HEALTH**

- No comments