

**From:** [Sears, Tricia \(DNR\)](#)  
**To:** [kmahoney.planning@gmail.com](mailto:kmahoney.planning@gmail.com)  
**Cc:** [Sears, Tricia \(DNR\)](#); [Long, Lexine \(COM\)](#)  
**Subject:** Medina's Critical Areas Ordinance Amendments (2025-S-11241): WGS comments  
**Date:** Tuesday, December 16, 2025 9:55:18 AM

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Hello Kim,

In keeping with the interagency correspondence principles, I am providing you with comments on Medina's Critical Areas Ordinance Amendments (2025-S-11241).

For this proposal submitted via Planview, I looked at the proposal and focused on areas related to WGS work. Of note, but not limited to, I look for language around the geologically hazardous areas, mineral resource lands, mining, climate change, and natural hazards mitigation plans.

Specifically in this proposal, I reviewed the CAO Update (Draft), Redlines to MMC 16.12, 16.50, and 16.72\_2025-1208.pdf and Commerce Notice to Adopt, Medina CAO Update\_2025-1210.pdf.

Kudos to you for working on your CAO! Below I have included comments and suggestions.

[CAO Update \(Draft\), Redlines to MMC 16.12, 16.50, and 16.72\\_2025-1208.pdf](#)

On page 2, section 16.12.180. - "Q" definitions, it is great to see the definition of qualified professional, and in particular, for the geologically hazardous areas.

On page 7, subsection C states, "C. Limited critical areas exemptions. The following developments, activities, and associated uses shall not be required to follow a critical areas review process; provided, that they are consistent with the requirements of this chapter. The city may condition approval of such to ensure adequate critical areas protection:" Are they subject to some other kind of review? I'm unclear how the actions listed can be exempt from critical areas review but can have conditions of approval "to ensure adequate critical areas protection" and how they can demonstrate they meet the listed provisions.

On page 8, it states, "i. The applicant submits a report from a qualified professional (e.g., certified arborist or professional forester)." Suggest consider adding that information to the definition of qualified professional on page 2.

On page 14, it states, "F. NGPAs in development proposals. Native growth protection areas (NGPAs) shall be used in development proposals for subdivisions and short subdivisions in accordance with the following:..." This appears to be specific to subdivisions and not all development proposals in critical areas. This is the only place there is a requirement to record to title that there is geologically hazardous areas hazard, and that is limited to landslide hazard. It is not required for erosion and seismic hazards. Consider adding those two hazards to the requirement. Consider having a provision that requires all of the critical areas found on the property to be noted / recorded to the title, not just NGPAs and subdivisions.

On page 26, in section 16.50.090 Geologically Hazardous Areas, good to see that the types of

hazards are identified: erosion, landslide, and seismic hazards. In this sentence from 2.a.ii “...U.S. Geological Survey or Department of Natural Resources;” suggest referring to it as the Washington Department of Natural Resources to clearly distinguish the federal and state level agencies. Suggest, as noted below, the code include a reference to the Washington Geologic Information Portal.

On page 31, good to see the factor of safety provision.

Suggest having provisions for geologically hazardous areas for temporary and permanent marking, including fencing and signs, similar to requirements in the wetlands and the fish and wildlife habitat conservation areas provisions.

[Commerce Notice to Adopt, Medina CAO Update\\_2025-1210.pdf](#)

Looks good.

Below, I include our usual language for this and future endeavors.

Recognizing the limitations of the current proposals, I want to mention that it would be great for you to consider these in current or future work, be it in your comprehensive plan, development code, and SMP updates, and in your work in general:

- Consider adding a reference to the definition of geologically hazardous areas, WAC 365-190-120, in other areas besides the CAO. In addition, consider adding a reference to WAC 365-196-480 for natural resource lands.
- Consider adding in other areas besides the CAO. If you have not checked our interactive database, the Washington Geologic Information Portal, lately, you may wish to do so. [Geologic Information Portal | WA - DNR](#)
- If you have not checked out our Geologic Planning page, you may wish to do so. [Geologic Planning | WA - DNR](#)

Thank you for considering our comments. If you have any questions or need additional information, please contact me. For your convenience, if there are no concerns or follow-up discussion, you may consider these comments to be final as of the 60-day comment deadline of 2/8/26.

Have a great day!

Tricia

Tricia R. Sears (she/her/hers)

**Geologic Planning Liaison**

Washington Geological Survey (WGS)

Washington Department of Natural Resources (DNR)

Cell: 360-628-2867 | Email: [tricia.sears@dnr.wa.gov](mailto:tricia.sears@dnr.wa.gov)