

State of Washington
DEPARTMENT OF FISH AND WILDLIFE
North Puget Sound • Region 4 • 16018 Mill Creek Blvd., Mill Creek, WA 98012-1296
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September 26, 2025

City of Snoqualmie
38624 SE River St
Snoqualmie, WA 98065

RE: Proposed Amendments relating to the Critical Area Ordinance pursuant to the Growth Management Act, amending the City of Snoqualmie's Municipal Code 19.12 Critical Areas – Fish and Wildlife Habitat Conservation Areas

Dear Planning Staff, Members of the Planning Commission, and Members of the City Council,

Thank you for giving the Washington Department of Fish and Wildlife (WDFW) the opportunity to comment **in support** of the proposed riparian buffer amendments to Snoqualmie's Critical Areas Ordinance (CAO), Chapter 19.12.

We would like to provide additional information that could preemptively address questions, clarify Growth Management Act (GMA) requirements, and emphasize the vital connection between healthy environments and thriving communities.

Under the GMA, jurisdictions are required to include Best Available Science (BAS) when updating their CAOs to ensure regulations are grounded in science and achieve no net loss of critical area functions and values¹. The importance of adhering to BAS is underscored by the legal case involving an appeal to the Growth Management Hearings board disputing the City of Anacortes' CAO. The Board remanded the CAO back to the city after determining that the proposed stream buffer widths did not adequately reflect BAS. Following the Board's decision, Anacortes adopted revised stream buffers informed by WDFW's BAS recommendations.

The BAS underpinning WDFW's riparian buffer recommendations is found in our **Riparian Ecosystems, [Volume 1: Science Synthesis and Management Implications](#)**. This document synthesizes peer-reviewed research regarding riparian area functions, such as pollution filtering, flood control, and nutrient cycling.

While Volume 1 is WDFW's BAS, [Volume 2](#) translates this science into practical management recommendations. The two volumes work together, with Volume 1 establishing the scientific foundation and Volume 2 providing actionable guidance for implementing that science in policy.

¹ Washington Administrative Code (WAC 365-195-900 through WAC 365-195-925)

Recognizing the importance of WDFW's BAS, many jurisdictions—including Clark, Pierce, Kitsap, Skagit, and King counties—have updated, or are actively updating, their stream buffer regulations to align with WDFW's recommendations.

Snoqualmie is similarly making meaningful progress by proposing a minimum 100-foot buffer for Class 3 and 4 streams to ensure, at the very least, pollution is filtered before reaching waterways. The proposed increase in buffer size for Class 2 streams also better reflects the space required for riparian ecosystems to function effectively. By integrating WDFW's BAS, Snoqualmie is strengthening its CAO, aligning with neighboring jurisdictions, and improving its ability to achieve the overarching goals of critical area protections.

It is important to note that riparian areas are essential in maintaining ecosystem services that directly benefit communities. Riparian areas filter pollutants, reduce flood risks, stabilize streambanks, and support critical habitat for fish and wildlife, including salmon. Protecting riparian areas is not simply an environmental mandate; it is a fundamental investment in public health, safety, and resilience.

We commend the city for valuing the health of local communities and the environment by incorporating WDFW's BAS into its regulations. The connection between healthy environments and healthy communities cannot be overstated.

If additional technical assistance or clarification is needed, WDFW is available to support your efforts.

Thank you,

A handwritten signature in black ink, appearing to read 'Marcus Reaves', with a long, sweeping horizontal line extending to the right.

Marcus Reaves, Regional Habitat Program Manager (Marcus.Reaves@dfw.wa.gov)