State of Washington
Department of Fish and Wildlife, Region 4
Region 4 information: 16018 Mill Creek Blvd, Mill Creek, WA 98012 | phone: (425)-775-1311

October 15, 2025

City of Sumas
Carson Cortez, City Planner
Sumas City Hall
433 Cherry Street
Sumas, WA 98295

RE: Submittal ID 2025-S-9793, WDFW's comments on the City of Sumas Critical Area Ordinance Update

Dear Mr. Cortez

On behalf of the Washington Department of Fish and Wildlife (WDFW), thank you for the opportunity to comment on the draft Critical Area Ordinance (CAO) as part of the current periodic update. Within the State of Washington's land use decision-making framework, WDFW is considered a technical advisor for the habitat needs of fish and wildlife and routinely provides input into the implications of land use decisions.

We provide these comments and recommendations in keeping with our legislative mandate to preserve, protect, and perpetuate fish and wildlife and their habitats for the benefit of future generations – a mission we can only accomplish in partnership with local jurisdictions.

Table 1. Recommended changes to proposed code language.

Code Section	Code Language (with WDFW suggestions in red)	WDFW Comment
15.20.090 Exemption from critical area review requirements	A.(7.) Activities involving artificially created wetlands or artificial watercourses intentionally created from nonwetland sites that do not contain fish and were not created to convey a stream of potion of stream that existed prior to development, including, but not limited to, grass-lined swales, irrigation and drainage ditches,	Because natural hydrology within Sumas has been significantly altered, many existing ditches follow historic or natural flow paths and may function as important extensions of aquatic habitat. In some cases, these conveyances can support incidental or seasonal use by anadromous or resident fish, particularly during high-flow events. All watercourses connected to fish-bearing waters should therefore be evaluated for appropriate protective measures. If a constructed irrigation or drainage ditch unintentionally

	stormwater detention facilities, and landscape features, except those features which were created as mitigation pursuant to city, state, or federal regulations.	supports fish, a fish exclusion device should be installed before the waterway can qualify under this exemption. Whatcom County provides cases in which ditches or other artificial watercourses should be considered streams in 16.16.710 2. Ditches or other artificial watercourses are considered streams for the purposes of this chapter when: a. Used to convey natural streams existing prior to human alteration; and/or b. Waterway is used by anadromous or resident salmonid or other resident fish populations; or c. Flows directly into shellfish habitat conservation areas.
15.20.090 Exemption from critical area review requirements	C. Exemption activities shall use reasonable methods or accepted best management practices to ~~reduce~~ avoid potential impacts to critical areas and/or to restore impacted critical areas to the extent feasible following completion of exempt activities. To be exempt does not give permission to destroy a critical area or critical area buffer or to ignore risk from a natural hazard.	Avoidance must be proven infeasible before other actions identified within the mitigation sequence can be taken (per WAC 197-11-768). Exempt activities should be limited to actions that avoid impacts to critical areas. If impacts do occur, this section must clearly require mitigation through a plan approved by the appropriate staff to ensure no net loss of critical area functions and values.
15.20.105 Critical area maps	A. In conjunction with adoption of this chapter, the city council shall adopt maps indicating the locations of known or potential aquifer protection areas, geologically hazardous areas, and upland wildlife habitat conservation areas within the city of Sumas...	Are these maps publicly available? If the city decides to incorporate specific maps within the chapter, we recommend incorporating the following: - Wildlife Habitat Connectivity in Whatcom County, Washington and Surrounding Watersheds - WDFW's PHS on the Web - WDFW's Priority Habitats And Species: Riparian Ecosystems and the Online SPTH Map Tool
15.20.230 Critical area mitigation—Generally	B. All proposed mitigation shall be contained in a proposed mitigation plan which shall be included as part of the detailed study. The mitigation plan shall describe the following: To demonstrate that avoidance has been adequately assessed, the applicant must, at a minimum, address the following considerations where applicable:	We recommend specifying the steps an applicant must take to demonstrate compliance with *avoidance* of impacts. This clarity helps ensure that avoidance is meaningfully evaluated before moving to other steps within the mitigation sequence.

	(A) Alternative building locations on the property; (B) Adjustments to the project footprint and orientation; (C) Modification of non-critical area setbacks, where feasible, as a first option before encroaching into critical areas or their buffers; (D) Multi-story design or alternate building design	
15.20.310 Allowed activities in wetlands, streams, and buffers.	A. Surface water discharge into a wetland buffer and/or streams and their buffers when no other alternatives for discharge are feasible and the discharge is designed to minimize physical, hydrologic and ecological impacts to the wetland or stream. Low impact development approaches shall be considered and implemented to the maximum extent feasible.	This addition is taken from this section in part D. (5.) and E.(5.). We recommend adding it here as well.
15.20.320 Fish and wildlife habitat conservation areas—Designation	E. Wildlife Habitat Corridors	WAC 365-196-335 states, "Each county or city planning under the [growth management] act must identify open space corridors within and between urban growth areas. They must include lands useful for recreation, wildlife habitat, trails, and connection of critical areas as defined in RCW 36.70A.030." We recommend designating 'Wildlife Habitat Corridors' as a type of FWHCA. If a method for identifying wildlife habitat corridors has not yet been established, we encourage you to reach out to WDFW staff for support. Whatcom County has some of the most comprehensive wildlife habitat connectivity data, making this periodic update a critical opportunity to put that information into action. Data and resources include: - The *Wildlife Habitat Connectivity in Whatcom County, Washington* report and corresponding mapping data and webmap tool, - Page 72-82 of WDFW's *Washington Habitat Connectivity Action Plan* and mapping resource, and

		- *Integrating Wildlife Habitat Connectivity Into Local Government Planning* guidance document.
15.20.320 Fish and wildlife habitat conservation areas—Designation	F. Riparian Management Zones (RMZs)	WDFW's current best available science standards and management recommendations outline the need to replace 'stream buffer' terminology with 'Riparian Management Zone' or RMZ for short. 'Stream buffer' implies that the area is comparable to a setback from development. In contrast, RMZ reflects the scientific understanding that these areas are critical areas in their own right, providing essential functions such as water quality protection, shading, bank stability, large woody debris recruitment, and wildlife habitat. Using RMZ language clarifies that these areas are not simply buffers but functioning ecological zones that require protection afforded to other critical area types. For these reasons, we recommend designating the RMZ as a type of critical area under the FWHCA designation.
15.20.320 Fish and wildlife habitat conservation areas—Designation	The foregoing notwithstanding, HCAs shall not include drainage ditches, irrigation canals and other similar artificial features that are within the boundaries of and maintained by a drainage improvement district, irrigation district or other similar agency. Fish exclusion devices shall be installed in artificial watercourses that have the potential to contain fish in order for the feature to qualify for exclusion from designation as a HCA.	We suggest the adjacent addition to align with state and federal standards to protect anadromous fisheries.
15.20.330 Fish and wildlife HCA indicators	C. A finding by a qualified biologist that the presence of a fish and wildlife HCA is likely;	Please reach out to your local habitat biologists for assistance during these determinations (Lizzi Lutes, Lizzi.Lutes@dfw.wa.gov). WDFW has an interactive state-wide web map that allows applicants/jurisdictions to input an address or GPS coordinate to see which WDFW habitat biologist covers that area: https://wdfw.maps.arcgis.com/apps/MapJournal/index.html?appid=48699252565749d1b7e16b3e34422271
15.20.350 Fish and wildlife habitat conservation areas—	C.(2) Buffers shall be based on recommendations provided by the Washington Department of Fish and Wildlife PHS Program and habitat biologist;...	See comment above.

Performance requirements		
15.20.340 Fish and wildlife habitat conservation areas—Detailed study requirements	B. (4.) A mitigation plan, including a discussion of how the proposal and any proposed mitigation measures is sufficient to avoid or minimize adverse impacts to identified species and habitats.	Please see comments for 15.20.230 (B.) above. We strongly recommended that applicants document the steps taken to demonstrate that avoidance has been adequately evaluated.
15.20.350 Fish and wildlife habitat conservation areas—Performance requirements.	B... ~~Buffers~~ RMZs shall be measured horizontally in a landward direction from the channel migration zone if present. If no channel migration zone is present, the RMZ shall be measured horizontally from the ordinary high water mark (OHWM), or top of bank where noted, for stream habitats and from the outermost edge of upland habitat areas~~; provided, that HCA buffers shall not extend into and beyond substantially improved surfaces, such as lawfully established structures and impervious surfaces~~.	Channel Migration Zones (CMZs) are critical for maintaining the processes that support riparian ecosystems. Without addressing CMZs, the CAO may fail to fully protect the functional riparian areas that naturally shift over time, which may also lead to increased flood risk and potential damage to infrastructure located too close to these dynamic areas. We encourage the city to delineate RMZs from the edge of the CMZ if present. For further information, please see the WA Department of Ecology's (DOE) informational webpage as well as WDFW's *Riparian Ecosystems, Volume 2: Management Recommendations.* Additionally, the RMZ or any critical area or its buffer should be delineated based on the BAS criteria established in this section and not determined by existing or historical land use. Where structures or improvements lawfully exist within an RMZ, critical area, or associated buffer, those structures should be recognized as legally nonconforming uses. This ensures consistent application of standards while maintaining the scientific integrity of critical area and critical area buffer delineations.
15.20.350 Fish and wildlife habitat conservation areas—Performance requirements.	C. Standard Buffers. 1. The following standard buffers shall be established for the following fish and wildlife HCAs based on designation and classification. Standard buffers are assumed to be comprised of a moderately intact native vegetation community that is adequate to protect the functions and values of the resource at the time of the proposed activity.	A common addition to this section that many jurisdictions are utilizing includes: "Standard riparian management zone widths presume the area is densely vegetated with a native plant community appropriate for the ecoregion, consisting of an average of 80% native cover comprised of trees, shrubs and groundcover plants. If the existing area is sparsely vegetated or vegetated with invasive species, the buffer must either be enhanced through an approved mitigation plan or increased by 33%." This ensures that there is an incentive to enhance degraded RMZs. Covington (Planning Commission

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<tr><td></td><td></td><td>meeting), Woodinville (planning commission packet), Skagit County (meeting agenda packet (14.24.530)), and other jurisdictions all utilize some version of the above language to incentivize riparian area restoration.</td></tr>
<tr><td>15.20.350 Fish and wildlife habitat conservation areas—Performance requirements.</td><td><table>
<tr><th>River/Stream</th><th>Standard ~~Buffer~~ RMZ</th><th>Or RMZ</th></tr>
<tr><td>Sumas River/Johnson Creek</td><td>~~100 feet from the OHWM~~ See SMP</td><td>111 feet</td></tr>
<tr><td>Sumas Creek</td><td>~~50 feet from the top of bank~~ $SPTH_{200}$</td><td>111 feet</td></tr>
<tr><td>Bone Creek</td><td>~~50 feet from the top of bank~~ $SPTH_{200}$</td><td>111 feet</td></tr>
<tr><td>All other naturally occurring streams</td><td>$SPTH_{200}$</td><td>111 feet</td></tr>
</table>
RMZs shall be established using the standard Site Potential Tree Height at 200 years ($SPTH_{200}$) width. Applicants may determine this width using WDFW's online mapping tool or through field delineation conducted by a qualified professional. Guidance and qualified professional resources are provided in WDFW's Guidelines for Determining Site Potential Tree Height from Field Measurements, as amended.</td><td>As noted earlier in this chapter and in WAC requirements under the GMA, CAOs must be updated to reflect BAS.
To align with WDFW's current best available science standards and management recommendations (released in 2020), we recommend the utilization of WDFW's Site Potential Tree Height at 200 years ($SPTH_{200}$) to measure RMZ widths (see WDFW's mapping tool and field delineation guidance).
By using WDFW's mapping tool, we can see that streams within Sumas have RMZs between 100 and 111 feet, depending on the location.
To stop pollutants from entering streams, RMZs must be 100 feet wide and fully vegetated at a minimum. Meeting RMZ standards is especially critical in agricultural areas such as Sumas, where nutrient loading from fertilizer application and livestock waste runoff can significantly degrade water quality. Adequately sized riparian areas are essential for filtering these pollutants, stabilizing streambanks, and reducing sediment and nutrient inputs that impair downstream habitat and aquatic health.
The importance of addressing water quality concerns is demonstrated by the listing of the Sumas River within the city on Ecology's water quality atlas, which outlines a trend of continued degraded water quality over time.
For examples of how other jurisdictions are aligning with WDFW's BAS, please see:
- Anacortes 19.70.330
- Burlington 14.15.380
- Skagit County 14.24.530
In some examples, jurisdictions have kept static buffer distances, represented by the third inserted column in the adjacent table.</td></tr>
<tr><td>15.20.350 Fish and wildlife habitat conservation</td><td>D. Increased Buffers. If the standard buffer is not comprised of a moderately intact native vegetation community, the administrator shall increase the</td><td>As mentioned above, we recommend replacing or supplementing this section with:
"Standard riparian management zone widths presume the area is densely vegetated with a native plant community appropriate for the ecoregion, consisting</td></tr>
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areas—Performance requirements	standard buffer to protect the functions and values of the resource and buffer areas or the applicant may choose to enhance the standard buffer to meet the above standard. Any such buffer enhancement shall be undertaken at the sole expense of the applicant and shall be based on and incorporated into a mitigation plan prepared by a qualified biologist consistent with the requirements established at Section 15.20.360...	of an average of 80% native cover comprised of trees, shrubs and groundcover plants. If the existing area is sparsely vegetated or vegetated with invasive species, the buffer must either be enhanced through an approved mitigation plan or increased by 33%." This establishes clear and measurable thresholds and criteria to guide applicants.
15.20.350 Fish and wildlife habitat conservation areas—Performance requirements	E. Buffer Reductions. 1. Buffer Reduction Based on Mitigation. Where compensatory mitigation is provided, standard buffers may be reduced; provided, that the standard buffer is not reduced by more than twenty-five percent. Buffer reductions shall only be permitted when all impacts to the habitat and their required buffers are compensated at the expense of the...	WDFW does not recommend buffer reductions for RMZs (stream buffers). To our knowledge, there is no scientific evidence supporting the idea that reducing a riparian buffer in one area while expanding it elsewhere achieves no net loss of ecological functions and values. WDFW's *Riparian Ecosystems, Volume 1: Science Synthesis and Management Implications* (2020) shows that riparian buffer widths are established on the specific ecological functions they are intended to support, **which are directly tied to the width**, continuity, and quality of vegetation. Any reduction to any part of the RMZ results in a direct loss of habitat functions. However, if averaging is limited to areas that no longer provide ecological function, such as existing pavement or previously developed portions of the site, then this provision may be more consistent with no net loss standards.
15.20.350 Fish and wildlife habitat conservation areas—Performance requirements	E. (2.) Buffer Averaging. Standard buffers may be reduced through the use of buffer averaging; provided, that the total buffer area is not reduced below the area that would result from use of the standard buffer, and provided, further, that the standard buffer is not reduced by more than twenty-five percent, and the use of buffer averaging will improve the overall protection of the resource. Buffer averaging may not be utilized in combination with buffer reductions based on mitigation.	See comments above. This is not supported by WDFW's BAS. If retained, we recommend that no area should be reduced below 100 feet **at a minimum** to maintain the pollution removal function.

15.20.360 Fish and wildlife habitat conservation areas—Mitigation requirements	A. When a regulated activity is proposed within a fish and wildlife habitat conservation area or its associated buffer, the applicant ~~shall~~ must demonstrate to the satisfaction of the administrator that all reasonable efforts have been made to avoid, minimize and/or compensate for potential impacts consistent with the mitigation sequence established at Section 15.20.300(A).	Please see comments for 15.20.230 (B.) above. We strongly recommend that applicants document the steps that were taken to *avoid* impacts.
15.20.360 Fish and wildlife habitat conservation areas—Mitigation requirements	C. Compensatory mitigation shall be provided on site. If proven infeasible, compensatory mitigation may occur ~~or~~ off site in the location that will provide the greatest ecological benefit and have the greatest likelihood of success; provided, that mitigation occurs as close as possible...	The preference for on-site in-kind mitigation should also be stated within the FWHCAs section. Fish-bearing streams rely on intact ecosystem functions and values, such as shading, large wood recruitment, filtration, and habitat connectivity, precisely where they occur. These functions cannot be replicated elsewhere, as aquatic species depend on them across the watershed for survival and recovery. Off-site or mitigation banking may provide some benefits, but it does not often replace the localized functions critical to maintaining fish populations and overall watershed health. Please review WAC 220-660-080 4. b. for guidance that specifies WDFW's requirements. For more information, please review the document *State of Washington Alternative Mitigation Policy Guidance For Aquatic Permitting Requirements from the Departments of Ecology and Fish and Wildlife.*
15.20.445 Variances	B.(2)(a) The proposal is limited to the minimum encroachment and the minimum variance necessary to afford relief and allow reasonable use of the property, and in case of a single-family dwelling such encroachment shall be limited to the extent necessary to create an aggregate developable area no larger than 5,000 square feet; and	This provision lacks clear and enforceable standards. Terms such as "minimum encroachment," "minimum variance necessary," and "reasonable use" are subjective and open to interpretation, which can lead to inconsistent application and difficulty in determining compliance. Additionally, allowing up to 5,000 square feet of "developable area" without specifying how that threshold is calculated (e.g., whether it includes driveways, accessory structures, or impervious surfaces) could result in encroachments that significantly impact critical area functions. Applicants should instead be required to demonstrate that the proposal represents the minimum level of disturbance necessary to afford reasonable use of the property. We recommend adding measurable criteria or guidance to clarify how "minimum" and "reasonable use" are to be determined to ensure consistency with the intent of critical area protection standards.

		Skagit County's CAO specifies that the Reasonable Use Exception (RUE) applies only to sites without at least 4,000 square feet of developable area outside the standard buffer (newest draft of SCC 14.24.140).
15.20.450 Reasonable use exceptions	5. The granting of the exception is consistent with the general purpose and intent of this chapter and will ~~not create significant adverse impacts~~ result in no net loss to the identified critical areas functions and values or otherwise be detrimental to public health, safety, or welfare.	No activity can impact critical areas unless no net loss of ecosystem function and value standards are met via the mitigation sequence (WAC 365-196-830, WAC 365-190-080, WAC 197-11-768).
15.20.450 Reasonable use exceptions	General comment.	We recommend adding language similar to Skagit County's CAO, which specifies that the Reasonable Use Exception (RUE) applies only to sites without at least 4,000 square feet of developable area outside the standard buffer (newest draft of SCC 14.24.140). Incorporating this threshold would help ensure that the RUE is applied narrowly and only in cases of genuine constraint.
15.20.480 Definitions.	"Channel Migration Zone" means the area within which a river channel is likely to move laterally over a specified period (e.g., 100 years).	Local governments should identify and limit development within Channel Migration Zones (CMZs)(WAC 173-26-221). Additionally, identifying CMZs helps guide development away from high-risk areas and reduces flood hazards. CMZs are critical for maintaining the dynamic processes that support riparian ecosystems. Without addressing CMZs, the CAO may fail to fully protect the functional riparian areas that naturally shift over time. We encourage the town to incorporate this CMZ definition as well as delineate riparian management zones (RMZs) from the edge of the CMZ if present. For further information, please see the WA Department of Ecology's (DOE) informational webpage as well as WDFW's *Riparian Ecosystems, Volume 2: Management Recommendations.*
15.20.480 Definitions.	"Ecosystem functions" are the products, physical and biological conditions, and environmental qualities of an ecosystem that result from interactions among ecosystem processes and ecosystem structures. Ecosystem functions include, but are not limited to, sequestered carbon, attenuated peak streamflow,	We suggest including the adjacent definition of 'Ecosystem Functions.' 'Functions' as a standalone term is defined later in this section, but we suggest alignment with language found in WAC 365-196-210 (14).

	aquifer water level, reduced pollutant concentrations in surface and ground waters, cool summer in-stream water temperatures, and fish and wildlife habitat functions.	
15.20.480 Definitions.	"Ecosystem values" are the cultural, social, economic, and ecological benefits attributed to ecosystem functions.	See comment above and WAC 365-196-210 (15).
15.20.480 Definitions.	"Fish habitat" or "habitat that supports fish life" means habitat, which is used by fish life at any life stage at any time of the year including potential habitat likely to be used by fish life, which could reasonably be recovered by restoration or management and includes off-channel habitat.	We recommend that the city include the WAC 220-660-030(52) definition of "fish habitat" to ensure consistency with state regulations and provide comprehensive protection of aquatic ecosystems.
15.20.480 Definitions.	"Hazard tree" is considered a threat to life, property, or public safety. Due to their high habitat value, hazard tree removal shall not adversely affect ecosystem functions to the extent practicable, encourage the creation of snags (Priority Habitat features) rather than complete tree removal, involve an avoidance and minimization of damage to remaining trees and vegetation, and require a qualified arborist to evaluate requests for hazard tree removal.	We recommend defining "Hazard Tree" in order to designate regulations that guide removal and mitigation if necessary.
15.20.480 Definitions.	"Monitoring and Adaptive Management" means the process of monitoring and improving permits, regulations, and programs to ensure the protection of critical areas.	This definition comes from the Department of Commerce. Jurisdictions should design a Monitoring and Adaptive Management program to: - Collect information on CAO effectiveness, - Evaluate the potential for exemptions and variances to cumulatively affect critical area functions across your jurisdiction, and - Improve permit implementation. See Commerce's Critical Areas Handbook, Chapter 7.
15.20.480 Definitions.	"No Net Loss of Critical Areas" refers to the actions taken to achieve and ensure no overall reduction in existing ecosystem	We recommend including this definition, as it is referenced throughout this chapter.

	functions and values or the natural systems constituting the protected critical areas. This may involve fully offsetting any unavoidable impacts to critical area functions and values pursuant to the Growth Management Act, WAC 365-196-830 'Protection of critical areas,' or as amended.	
15.20.480 Definitions.	"Priority Habitat" means a habitat type with unique or significant value to many species. An area identified and mapped as priority habitat has one or more of the following attributes: comparatively high fish and wildlife density, comparatively high fish and wildlife species diversity, important fish and wildlife breeding habitat, important fish and wildlife seasonal ranges, important fish and wildlife movement corridors, limited availability, high vulnerability to habitat alteration, and unique or dependent species.	We'd recommend the adjacent definition for 'Priority Habitat' be added here, taken from WDFW's Priority Habitats and Species List. Priority *habitats* and *species* are two distinct concepts that are represented through WDFW's Priority Habitats and Species Program (PHS). The Washington Administrative Code (WAC) refers to PHS in sections dealing with CAOs, Shoreline Master Programs (SMPs), and the Essential Facilities Siting Evaluation Council. The state supreme court has held that PHS is a valid source of best available science for the Growth Management Act.
15.20.480 Definitions.	"Priority Species" are fish and wildlife species requiring protective measures and/or management actions to ensure their survival. A species identified and mapped as priority species fit one or more of the following criteria: State-listed candidate species, vulnerable aggregations, and Species of recreational, commercial, and/or Tribal importance.	See comments above.
15.20.480 Definitions.	"Riparian management zone" (RMZ) means the area that has the potential to provide full riparian functions. In many forested regions of the state, this area occurs within one 200-year site-potential tree height measured from the edge of the stream channel. In situations where a	We suggest adding 'Riparian Management Zone' as its own definition as opposed to replace outdated 'stream buffer' terminology. This is especially important when considering RMZs as a type of critical area and not buffers to critical areas. For further related management recommendations, see WDFW's *Riparian Ecosystems, Volume 2: Management Recommendations.*

	CMZ is present, this occurs within one site potential tree height measured from the edges of the CMZ. In non-forest zones, the RMZ is defined by the greater of the outermost point of the riparian vegetative community or the pollution removal function, at 100 feet.	
15.20.480 Definitions.	"Watershed Plan" means a plan developed by federal, tribal, state, and/or local government agencies and/or appropriate non-governmental organizations, in consultation with relevant stakeholders, for the specific goal of aquatic resource restoration, establishment, enhancement, and preservation. A watershed plan addresses aquatic resource conditions in the watershed, multiple stakeholder interests, and land uses. Watershed plans may also identify priority sites for aquatic resource restoration and protection. Examples of watershed plans include special area management plans, advance identification programs, and wetland management plans.	Including a definition for "Watershed Plan" provides clarity when referencing locally or regionally adopted plans that guide aquatic resource restoration and protection. It helps ensure consistency in implementation, supports landscape-scale planning, and allows jurisdictions to align CAO decisions, such as mitigation, restoration priorities, and buffer considerations, with established, stakeholder-informed watershed efforts. This definition also acknowledges the role of collaborative, science-based planning in achieving long-term ecological outcomes.

Thank you for taking the time to consider our recommendations to better reflect the best available science for fish and wildlife habitats and ecosystems. We value the relationship we have with your jurisdiction and the opportunity to work collaboratively with you throughout this periodic update cycle. If you have any questions or need our technical assistance or resources at any time during this process, please don't hesitate to contact me or the Regional Land Use Lead, Morgan Krueger (morgan.krueger@dfw.wa.gov).

Sincerely,

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CC:
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