



State of Washington

## Department of Fish and Wildlife, Region 4

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October 15, 2025

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

### **RE: Submittal ID 2025-S-9790, WDFW's comments on the City of Sumas Comprehensive Plan Update**

Dear Mr. Cortez

On behalf of the Washington Department of Fish and Wildlife (WDFW), thank you for the opportunity to comment on the Sumas draft Comprehensive Plan 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 policy language.**

Policy Number	Policy Language (with WDFW suggestions in red)	WDFW Comment
Land Use Element		
Page 3-5	In urban environments, buffers range in size from 10 to over 100 feet. In the conservancy environment, an upland buffer of 100 feet applies. For both stream and wetland buffers, the codes	This level of detail may be best suited for regulations instead of Comprehensive Plan policies and goals. Additionally, see WDFW's comments for the Critical Area Ordinance (CAO). According to WDFW's Best Available Science (BAS), stream buffers must be <b>at least 100 feet wide</b> and fully

	allow averaging of buffer widths and also allow reductions in buffer widths if landowners develop enhanced buffers.	vegetated <b>at a minimum</b> to effectively filter pollutants before they reach waterways.
Page 3-6	<p>3.3 Natural System Protection Areas</p> <p>Above-ground structures should be prohibited within NSPAs, including parking and impervious surfaces. Underground structures should be allowed when such structures do not <b>significantly</b> impact habitat quality.</p>	<p>WDFW recommends incorporating the 'Natural Systems Protection Areas (NSPAs)' designation directly into the CAO. Protective standards for NSPAs should be codified within the ordinance itself, as policies do not carry the same legal authority or enforceability as adopted regulations. Consistency between the Comprehensive Plan and the CAO is also important to align these planning tools and to avoid conflict.</p> <p>Additionally, we recommend removing the word 'significantly' in the adjacent paragraph. 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).</p>
Page 3-6	<p>Enhancement of habitat should be accomplished through regulatory incentives, <del>including reductions in mandatory buffers when buffer quality is enhanced.</del></p>	<p>This level of detail may be best suited for regulations instead of Comprehensive Plan policies and goals.</p> <p>Additionally, as stated within our comments for the CAO, WDFW does not recommend buffer reductions or averaging for riparian management zones (RMZs or 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 <a href="#"><u>Riparian Ecosystems, Volume 1: Science Synthesis and Management Implications (2020)</u></a> shows that riparian buffer widths are established on the specific ecological functions they are intended to support, <b>which are directly tied to the width, continuity, and quality of vegetation</b>. 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. Restoration should be encouraged as part of on-site development, but it should not be tied exclusively to actions that reduce or encroach upon critical areas, as this approach gradually diminishes their extent and ecological function over time.</p>

Page 3-6	In order to provide the science-based data needed to identify the existing value of habitat and the potential for habitat enhancement, Sumas commissioned two studies. DEA assessed the fish habitat value of local streams, and Bexar Consulting updated the city's wetland inventory.	We recommend planning for an update to the fish habitat study, as it appears the study mentioned here was conducted in 1998.
Page 3-7	Designated NSPAs are shown on Map 5. The following site-specific discussion is linked to the numbered areas on that map:	We recommend requiring restoration of critical areas on these parcels as a condition of development, rather than allowing mitigation to serve as compensation for new project impacts. Intensive development adjacent to critical areas frequently results in degraded ecosystem functions and values due to increased impervious surfaces, stormwater runoff, and other edge effects. Protections should not be reduced solely to create an opportunity for restoration; instead, restoration should be pursued proactively to enhance existing ecological conditions while maintaining full protective standards.
Page 3-8	<p>3.4 Green Spaces and Community Forests</p> <p>... Although there is nothing specifically identified for this requirement, the City does actively protect these sorts of spaces to preserve the beautiful scenery and ecosystem where Sumas is located.</p>	<p>When identifying green spaces, WDFW recommends that the City prioritize areas that connect wildlife habitat corridors and critical areas. As stated in WAC 365-196-335, "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 the connection of critical areas as defined in RCW 36.70A.030." Prioritizing acquisition and protection of areas that achieve multi-benefit outcomes often ensures more efficient use of public resources and advances multiple Comprehensive Plan goals simultaneously.</p> <p>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:</p> <ul style="list-style-type: none"> <li>- The <i>Wildlife Habitat Connectivity in Whatcom County, Washington</i> <a href="#">report</a> and corresponding mapping <a href="#">data</a> and <a href="#">webmap tool</a>.</li> </ul>



		<ul style="list-style-type: none"> <li>- Page 72-82 of WDFW's <a href="#">Washington Habitat Connectivity Action Plan</a> and <a href="#">mapping resource</a>, and</li> <li>- <a href="#">Integrating Wildlife Habitat Connectivity Into Local Government Planning</a> guidance document.</li> </ul>
Page 3-12	To remedy this, the City has expanded the boundaries of its UGA for the purpose of expanding Sumas City Limits to accommodate additional growth in the future.	<p>Table 3-1 shows that multi-family residential uses currently occupy only 1% of the total UGA acreage. Table 3-2 indicates that areas designated for high-density and medium-density residential development account for 19% and 11.7% of the UGA, respectively. This discrepancy suggests that while the city has already designated substantial land for higher-density housing, very little of it has actually been developed — a problem that will not be resolved by expanding the UGA.</p> <p>Under <a href="#">RCW 36.70A.110</a> (3) urban growth should be located first in areas already characterized by urban growth that have adequate existing public facility and service capacities to serve such development, second in areas already characterized by urban growth that will be served adequately by a combination of both existing public facilities and services and any additional needed public facilities and services that are provided by either public or private sources, and third in the remaining portions of the urban growth areas.</p> <p>The area northeast and northwest of May Road proposed for inclusion in the UGA contains extensive wetlands and a stream corridor, both of which serve important flood storage and water quality functions. Directing new development into this area would likely create similar flooding challenges the city has recently experienced east of SR-9. Wetlands north of May Road absorb excess stormwater and filter pollutants; replacing them with impervious surfaces would eliminate these natural protections and increase the city's long-term flood risk. Developing wetlands in flood-prone areas effectively removes the natural systems that act as the landscape's most effective flood sponges.</p>
Page 3-15	b. <i>Triangular wedge between Kneuman Rd. and the Lynden rail spur.</i>	Any redevelopment within this area could provide an opportunity to realign Sumas Creek through the

		NSPA to support habitat restoration and establish an improved buffer between the creek and the roadway, helping to restore ecological function and mitigate existing impacts. WDFW advises that any new roads or heavy-haul routes avoid the NSPA and consider both the environmental and long-term community benefits of restoring this area.
Page 3-15	<i>c. Area west of B-N main line straddling West Front Street.</i>	We suggest adding to this section that the area is located near Johnson Creek, an important tributary to the Sumas River. The site also appears to have a surface drainage connection between Johnson Creek and Bone Creek. This hydrologic connection should be carefully considered when planning for industrial zoning, as the area is mapped as potential rearing habitat under the GHPA referenced below.
Page 3-15	<i>d. Area south of city limits.</i>	Bone Creek runs through the northwest corner of the UGA annexation area and should be identified as potential rearing habitat. This feature may be important to note in this section to ensure its habitat functions are considered and protected during future development planning.
Page 3-18	<i>d. Expansion Area west of city limits.</i>	As noted in previous comments, expansion west of the city limits is not recommended due to environmental constraints, including the NSPA designations along Sumas Creek and the presence of high-quality rearing habitat for coho and other salmonid species in this area. Ideally, the City should focus on increasing densities within existing urban areas before considering any UGA expansion.
Page 3-19	Map 12 shows the expected locations of open space within the city and surrounding area.	As noted above and in WDFW's comments on the CAO update, we recommend incorporating wildlife habitat corridors into this map and coordinating their planning alongside open space and trail networks. An overlay designation may be suitable for this purpose. Fully planning jurisdictions must identify open space corridors within and between UGAs, lands for recreation, wildlife habitat, trails, and connecting critical areas. Jurisdictions should consider identifying open space corridors when reviewing and updating UGAs, CAOS, and the land

		use element of the comp plan during periodic updates ( <a href="#">WAC 365-196-335</a> ).
Page 3-21	Policy 3.4.1: The city should establish residential areas that accommodate <del>low-, medium-, and</del> high-density neighborhoods, <b>prioritizing infill and redevelopment within existing urban areas to minimize the conversion of natural and agricultural lands. When directing higher-density growth, the City should consider flood risk and other environmental constraints.</b>	We recommend incorporating policies that both direct growth toward lower-risk flooding areas and establish clear density targets, creating more actionable and effective growth management strategies.
Page 3-22	<ul style="list-style-type: none"> <li>• Policy 3.7.1: The city should establish regulations to protect the functions and values of the natural environment, including wetlands, rivers, streams and other priority habitats.</li> <li>• Policy 3.7.2: The city should develop and maintain parks and other recreational amenities to serve local residents.</li> <li>• <b>Policy 3.7.3: Incorporate wildlife habitat connectivity and critical area linkages into open space and trail planning to achieve multi-benefit outcomes and efficient use of public resources.</b></li> </ul>	For the reasons stated above, we recommend incorporating proposed policy 3.7.3 highlighted in red.
<b>Capital Facilities Element</b>		
General comment	General comment	<p>We recommend allocating funding in the Capital Facilities Plan (or where most applicable) for stormwater retrofits and culvert upgrades, prioritizing multi-benefit projects that improve fish passage, enhance climate resilience by accommodating future high-flow conditions, and reduce pollutant runoff into natural waterways. By prioritizing projects with overlapping environmental and infrastructure benefits, the city may also be better positioned to leverage diverse funding sources for implementation.</p> <p>Other options include direct action via regulatory requirements. The city of Anacortes allocates utility funds to daylight local piped streams. Redmond's code, section 21.64.020, outlines "D. 6. The City may require that a stream be removed</p>



		<p>from a culvert as a condition of approval, unless the culvert is not detrimental to fish habitat or water quality, or removal would be detrimental to fish or wildlife habitat or to water quality.”</p> <p>Additionally, see <a href="#">WDFW’s climate-change-resilient culvert</a> webpage and <a href="#">Incorporating Climate Change into the Design of Water Crossing Structures: Final Project Report</a> (2017) for resources on how to incorporate climate-resiliency into culvert design and avoid future flooding.</p>
Policy suggestion	<p>Projects identified in the near-term Capital Improvement Program should prioritize enhancing the ecosystem services provided by natural assets—such as wetlands, forests, and floodplains—that support water filtration, flood attenuation, and carbon storage.</p>	<p>Incorporating this policy ensures that public investments deliver multiple long-term benefits by leveraging the natural functions of ecosystems. Wetlands, forests, and floodplains provide essential services such as flood mitigation, stormwater filtration, carbon sequestration, and habitat connectivity, often at lower cost and greater durability than built infrastructure. Kitsap County’s Natural Resource Asset Management Program (KNRAMP) employs a structured approach to manage its natural assets (such as forests, shorelines, and freshwater systems) by establishing Levels of Service (LOS) metrics. These LOS metrics serve as measures of quality, indicating how well natural assets are functioning and the extent of ecosystem services they provide. For more information, please see Kitsap County’s <a href="#">story map</a>.</p>
Page 10	<p>4.4.2</p> <p>Establish new standards. According to the requirements of the Puget Sound Stormwater Plan, Sumas must adopt a basic stormwater program containing at least the following elements:</p> <p>... Sumas has at this time complied with the first two listed elements. A more comprehensive ordinance should be adopted once appropriate small-town models become available.</p>	<p>We recommend the city not delay adopting a more comprehensive stormwater ordinance until “small-town models” become available. Given Sumas’s history of severe flooding and the presence of multiple water bodies listed by Ecology for water quality impairments, stronger stormwater management standards are urgently needed to protect public safety, infrastructure, and downstream ecosystems. The city can reference existing examples from other small jurisdictions already implementing Puget Sound Stormwater Plan requirements to ensure timely compliance and reduce future flood and pollution risks. Resources include <a href="#">U.S. Environmental Protection Agency - LID resources page</a> as well as the <a href="#">Olympia water saver incentive programs</a>, <a href="#">Puget Sound Green Stormwater Infrastructure Incentives Programs</a>, <a href="#">Green Stormwater Infrastructure Assistance Programs Guidebook</a>, the <a href="#">Rain Garden Handbook for Western Washington</a>, the</p>

		Sustainable Development Code <a href="#">website</a> , and the <a href="#">VISION 2050 Planning Resources Guidance on Integrating Stormwater Solutions into Comprehensive Plans</a> .
Page 15	4.8 Parks and Recreation	Is this meant to be within the Capital Facilities element or its own element?
Page 17	Typical planning standards call for 2.5 acres of community park and 1.5 acres of neighborhood park per 1,000 population.	Many jurisdictions use the ½-mile LOS standard in their comprehensive plans and park plans because it aligns with equity in access, walkability, and environmental justice frameworks. Setting this metric helps translate broad policy objectives into a clear, measurable, and actionable standard. See the Trust for Public Lands <a href="#">website</a> , which strives to provide information and resources so that everyone can live within a 10-minute walk (about ½ mile on average) from a park. This is also incorporated within the Climate Resiliency element (Policy 9.5.3: Ensure that all community members have equitable access to green space within a half mile).
Page 20	Policy 4.4.4: Develop trails that link downtown with planned open spaces, <del>including</del> wetland mitigation areas, <b>and areas identified for wildlife habitat corridor acquisition and planning.</b>	As stated above, planning corridors and trails in accordance with the city's multiple needs is recommended.
Page 20	Policy 4.5.1: Ensure that adequate land for neighborhood parks is acquired through developer dedication when processing major new subdivisions.	We recommend establishing and maintaining connected natural open spaces across all housing types to support wildlife movement, protect ecological functions, and ensure equitable access to green space. While regulations often specify the amount of project area to be reserved as open space, we suggest the city go further by requiring new development to locate open space areas in ways that connect with adjacent open spaces. Standards should also prioritize siting open space where it provides the greatest environmental benefit, such as preserving large tree groves and maintaining habitat corridors.
Page 21	4.8.6 Project prioritization Upon completion of the feasibility analysis, projects were placed into the following three groups corresponding to a conceptual development schedule. Near term (1 – 2 years). These facilities/programs are popular yet	As mentioned above, we recommend combining these projects with wildlife habitat corridor planning. According to the Wildlife Habitat Connectivity <a href="#">map</a> for Whatcom County, priority areas include the riparian corridors along the city's streams and rivers. These areas could be prioritized for protection and trail use



	<p>require little capital investment. They are within the realm of possible development by the City acting alone.</p> <ul style="list-style-type: none"> <li>Trails. Rights-of-way and easements already available to the City provide the skeleton upon which a trail system could be developed. Relying upon those easements, a proposed trail/sidewalk system is included on Map 12. The proposed facilities are discussed in priority order, based upon existing needs and feasibility of construction</li> </ul>	<p>simultaneously to advance multiple Comprehensive Plan goals.</p>
<b>Housing Element</b>		
Page 5-6	<p>Policy 5.3.1: The city will supply enough residential land to meet the projected housing need over the next 20 years.</p>	<p>While total land area is often used as a metric for housing capacity, it does not directly correlate to the number or diversity of housing units that can be built. Housing availability and affordability are determined primarily by zoning, development standards, and how efficiently land is utilized, particularly whether maximum zoning allowances are achieved.</p> <p>This distinction is important for areas with significant critical area constraints. Constrained sites tend to limit single-family subdivision potential, making them more compatible with middle-housing forms such as duplexes, townhomes, or small multifamily units that can fit within smaller buildable footprints. Expanding the Urban Growth Area or increasing total land area without addressing zoning and development patterns risks perpetuating low-density, single-family development, which does not advance affordable housing or overall housing capacity goals.</p>
Policy suggestion	<p>Encourage environmentally sustainable development by establishing incentive programs, such as expedited permit review, fee reductions, or technical assistance, to promote green building, energy efficiency, and climate-resilient design.</p>	<p>We encourage the city to address environmentally sustainable development by utilizing incentives to meet climate resiliency goals. See Shoreline's <a href="#">deep green incentive program</a> which outlines how green development can participate in expedited review as well as fee waivers and/or reductions. The Sustainable Development Code <a href="#">website</a> is also a great resource in outlining how to remove code</p>

		barriers, create incentives, and fill regulatory gaps in pursuit of this policy's goals. See also the <a href="#">city of Issaquah</a> and <a href="#">Bellevue's</a> clean building incentive programs that aim to assist applicants in reaching energy efficiency standards.
Policy suggestion	<p>Address the need for flexibility within developmental regulations to address environmental protection standards by updating regulations to include:</p> <ul style="list-style-type: none"> <li>• Flexible subdivision design, such as cluster development or conservation subdivisions.</li> <li>• Flexibility in lot size and configuration, including on-site density transfers to accommodate habitat patches and corridors.</li> <li>• Modification of setbacks, where feasible, as a first option before encroaching into critical areas or their buffers.</li> </ul>	<p>These suggestions come from WDFW's <a href="#">Landscape Planning for Washington's Wildlife</a>, which outlines that all landscapes, from the human-dominated (e.g., urban) to the relatively undisturbed (e.g., managed forests), can contribute to maintaining ecological health, benefitting both people and wildlife.</p>
<b>Transportation Element</b>		
Page 6-1	<p>Goal 6.1: Provide transportation systems that provide convenient, safe, and accessible access to employment, educational and recreational opportunities for citizens and visitors, and that provide for the movement of goods and services.</p> <p><b>Policy 6.1.8: Identify, establish, and maintain connected wildlife habitat corridors that facilitate safe wildlife movement and reduce the risk of wildlife-vehicle collisions.</b></p>	<p>The adjacent addition is crucial for Sumas as it balances rural character with increasing population density. As the city grows, the expansion of infrastructure risks fragmenting essential wildlife habitats, which can disrupt migration corridors, reduce biodiversity, and increase conflicts between wildlife and human activities. By explicitly including wildlife in this policy, Sumas can plan and maintain habitat corridors that prioritize wildlife connectivity. This focus not only protects local ecosystems but also enhances motorist safety by reducing the likelihood of wildlife-vehicle collisions, ultimately supporting a transportation network that meets the needs of people and wildlife alike. For resources, see comments for 'page 3-8, 3.4 Green Spaces and Community Forests' above and <a href="#">The Washington Wildlife Habitat Connectivity Working Group</a>, WSDOT's <a href="#">Reducing the risk of wildlife collisions website</a> as well as <a href="#">Wildlife Habitat Connectivity Consideration in Fish Barrier Removal</a></p>



		<a href="#">Projects</a> , Montana Fish, Wildlife, and Parks' <a href="#">How to Build Fence with Wildlife in Mind</a> , and WDFW's <a href="#">website</a> .
Page 6-2	Goal 6.2: Coordinate transportation planning and construction with neighboring jurisdictions and with the state. <b>Policy 6.2.9: Work collaboratively with the Washington Department of Fish and Wildlife, counties, and adjacent cities to plan and implement wildlife habitat corridors that align with regional connectivity priorities and transportation planning efforts, promoting safe wildlife movement and reducing conflicts such as wildlife-vehicle collisions.</b>	See resources above.
<b>Climate Change and Resiliency Element</b>		
Page 9-13	Policy 9.6.2: Protect and restore riparian vegetation to reduce erosion, provide shade, and support other functions that improve the climate resilience of streams.	Within recent Critical Area Ordinances (CAOs) updates, we commonly see the phrasing, <b>"The standard riparian management zone widths presume the area is vegetated with a native plant community for the ecoregion, consisting of an average of 80 percent native cover comprised of native trees, shrubs, and groundcover plants, and less than 10 percent cover of noxious weeds. If the existing buffer does not meet these standards, the buffer must either be enhanced by an approved mitigation plan or increased by 33 percent."</b> This ensures that all projects taking place adjacent to riparian areas trigger restoration.
Page 9-13	Policy 9.6.4: Identify opportunities to expand habitat protection and improve habitat quality and connectivity to foster climate resilience using conservation area designations, buffers, and open space corridors.	Please see our comments for 3.4 Green Spaces and Community Forests. 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.
Page 9-13	Policy 9.6.5: Manage tree canopy and forests (including parks and open spaces) to decrease climate-exacerbated risks from severe wildfires, protect residents, and improve ecosystem health and habitat functions.	We recommend Sumas pursue a tree canopy assessment to form the baseline data for a tree canopy management plan (updated annually if possible) to assess trends, set goals, and measure progress toward those goals year-to-year. This plan should also measure how well the city's tree-related ordinances are functioning in retaining



	<p>Suggested additional policy:</p> <p><b>The City shall conduct a tree canopy assessment to establish baseline conditions and provide the foundation for a tree canopy management plan to achieve long-term canopy goals.</b></p>	<p>trees on the landscape. <b>It may not be enough to rely on ordinances if there is not a system in place to track cumulative impacts over time.</b></p> <p>Resources:</p> <ul style="list-style-type: none"> <li>• See tree equity mapping data via <a href="https://treeequityscore.org">treeequityscore.org</a>.</li> <li>• Tree canopy data resources can be found via the <a href="#">USDA website</a>, WDFW's <a href="#">change detection tree canopy data</a>, the Puget Sound Washington <a href="#">Urban Canopy Project</a>, and the WA <a href="#">DNR website</a>.</li> <li>• See the Urban Tree Canopy Assessment <a href="#">website</a> and how <a href="#">King County utilized this tool</a> to assess conditions within their local jurisdictions.</li> <li>• Example ordinances and plans can be found on the <a href="#">MRSC website</a>.</li> <li>• Discover the value of the benefits provided by individual trees around your home and in your community with the <a href="#">National Tree Benefit Calculator</a>.</li> <li>• See also the city of Everett's <a href="#">Tree Keeper</a> website which displays the monetary benefit of their tree canopy.</li> <li>• <a href="#">City of Tacoma</a> is a great resource for exploring how tree canopy plans can become a community effort, <a href="#">how data can be presented</a>, and how to track canopy loss/gain.</li> <li>• See also WDFW's <a href="#">Habitat at Home</a> program, which encourages the protection of wildlife through purposeful vegetation planning.</li> </ul>
Page 9-13	Policy 9.7.1: Incorporate hydrologic climate impacts into the design of water-crossing structures (i.e., climate-smart culverts and bridges).	Please see <a href="#">WDFW's climate-change-resilient culvert</a> webpage and <a href="#">Incorporating Climate Change into the Design of Water Crossing Structures: Final Project Report</a> for resources on how to incorporate climate-resiliency into culvert designs.
Page 9-14	Policy 9.9.7: Facilitate and support long-term community visioning including consideration of managed retreat from high-hazard areas.	To help plan hazard-related communication and outreach, refer to <a href="#">NOAA's template resources</a> and general information on their <a href="#">website</a> to get the conversation started.

Additionally, we suggest utilizing the [Sound Choices Checklist](#) in further review of all Comprehensive Plan elements. This checklist utilizes broad priorities that are applicable to all jurisdictions.

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](mailto:morgan.krueger@dfw.wa.gov)).

Sincerely,



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CC:

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