

## Jessi Roberts

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**From:** katrina jackson <nwckatrina@comcast.net>  
**Sent:** Friday, May 29, 2015 3:05 PM  
**To:** Cliff Strong  
**Cc:** Wayne Fitch  
**Subject:** re: code revisions 16.16.760.E7

Cliff,  
I just wanted to follow up with some additional information.  
I had reported that WDOE and Corps considered an area that was mitigated as offset for permitted impact elsewhere to not become the subject of future development.  
While in theory that works in many cases, not always, Erin Page, emailed them and they responded that there are occasions when that form of mitigation can be mitigated elsewhere, road widening etc, but with more scrutiny.  
As far as the restoration for a violation Susan Meyer from Ecology responded. 'If the area proposed for development was the subject of a past violation and the landowner willingly restored it, then they would need to submit a JARPA for the new proposal with new mitigation for the impacts to the restored wetland. The mitigation ratios may be increased to account for the temporal loss of the original wetland impact, though.

Susan

Basically the problem is that how the code is written does not distinguish between Restoration (for violation) and Compensatory Mitigation (for permitted activity)  
It is one of those cases when a provision might sound good and the fault is discovered when you start working through it. The lands that are disturbed need to be restored, but violators cannot be expected to plan their development or predict what a future buyers land use requirements might be. Also if no building is scheduled within many years a future project would need to follow the code in place at the time of the application, so working through a development plan today to void an area for the distant future is not really possible either.

Katrina Jackson



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360.510.1605  
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## Jessi Roberts

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**From:** Barry Wenger <bawenger@gmail.com>  
**Sent:** Thursday, April 02, 2015 11:33 AM  
**To:** Cliff Strong  
**Subject:** Wildlife and Habitat Planning - CAO exemption ramifications

Hey Cliff - In a March 31, 2015 email with attachment to you, Wendy Harris raises an excellent point and one that is tied to cumulative impacts in particular. Think of how much writing you could get accomplished if you were interrupted every three minutes by someone stopping by or calling you on your phone to chat! Now, transfer that dynamic to birds trying to nest or fauna trying to access food sources in the limited windows of opportunity available due to prey cycles, tidal cycles, etc. My suggestion is to have an independent scientific review team evaluate such "low-impact" activities and recommend to the county staff what type of mitigating measures are warranted such as seasonal limitations, time period limitations e.g. dusk-to-dawn prohibitions, etc and have the review team establish a monitoring program that provides feedback on what works and what doesn't. WWU, biological consultants/experts, and the other colleges as well as the tribes could perhaps provide this service. I would propose these "low-impact" activities be categorized as "conditionally approved" provided they can individually demonstrate BAS compliance. Over time, a set of enforceable standards and conditions could be developed which would be automatically applied to each type of activity as permitted. Hope this helps and thank you, once again, for striving to raise awareness of this important issue. BW

## Jessi Roberts

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**From:** katrina jackson <nwckatrina@comcast.net>  
**Sent:** Tuesday, May 26, 2015 3:36 PM  
**To:** Cliff Strong  
**Subject:** FW: Whatcom County CAO changes

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Good Afternoon,  
In regards to the [code](#) rewrite,

I have a pressing matter that has come up in regards to critical areas that are disturbed without a permit, where otherwise a permit would be required.

I have worked through the Army Corps of Engineers and WDOE on matter of disturbance on other sites out of Whatcom County. As long as the mitigation is not a compensatory offset for some form of impact elsewhere (it is a restoration for damage to an area) then the land use follows any other permitting allowances and restrictions.

Please try and think of many examples as to how this needs to NOT be restricted permanently as a [compensatory mitigation](#) as stated in WCC16.16.760 B7. . Someone could go 4 wheeling or logging the whole front 200 feet of their property (wetland and buffer) [or their dump truck could spill its load or have an overlayment event](#) and have no immediate intent of building. An upland building site could be somewhere in the back 200 feet. [Or a small wetland could be in the center of a business site, but because of the over spillage at some point in time, if mitigated in Whatcom county, would have to stay in the center of a parking lot forever.](#) The site damage needs to be restored so that it would return basically as close as possibly to function as well over time as it did before. [That part is simple.](#) The knowledge of the future potential development of the property cannot be determined [always at the time of an unpermitted activity.](#) But under the code the full 200 front feet [or the small inconveniently located wetland](#) once mitigated would be protected into perpetuity [as the code is written.](#) The upland building site would become landlocked. Yes you could plan and put in a driveway as not a mitigated feature, but then what if a subdivision was proposed and a wider driveway or two driveways would be needed etc, or the site rezoned etc. [In the interim the way the code is written requires that no mitigation be installed in locations where development may be planned in that location in the future.](#)

The state and federal government jurisdictions have resolved the issue by a restoration for a damage being just that a restoration for the damage. Repair as quickly as possible [and reset.](#)

If the mitigation is an offset for [permitted](#) impact elsewhere then it stays protected and not made the subject of future development. [Chances are that if Washington department of Ecology and the Corp agree on how to manage the restoration for a violation then there is some history which has been tested in the courts as to how to best manage the situation.](#)

Please call me about this matter if you have any questions. I have worked through [a few projects](#) with other jurisdictions and can think of no way that a restoration for damage can be turned into a plan that includes a future planned development [plan in order to void certain areas from mitigation into perpetuity.](#) [Randel Perry](#) may be able to provide the language they use in these type of matters if that would help.

Katrina Jackson



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## Jessi Roberts

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**From:** John Patten <john2patten@gmail.com>  
**Sent:** Wednesday, August 19, 2015 10:12 AM  
**To:** Cliff Strong  
**Subject:** wetland changes

Hi Cliff,

I am just following up on our phone conversation a few minutes ago. As mentioned, I am extremely concerned about the taking of private property rights, as it relates to wetlands, without just compensation as required by law. I believe it so far has gone way beyond what the Wa State constitution allows for eminent domain, as we discussed, in relation to the county taking control of portions of our property for use dictated by the governmental organizations.

At the planning desk, I was told that this dictated use was still "private use". I think this is a good example of bureaucratic detachment from reality. And I think it violates the very concept of private property, which is a cornerstone of our society, not to mention economic prosperity of our citizens as a whole, in this county.

Please keep me updated as to times and places of upcoming public hearings about this. I look forward to meeting you and discussing these things further.

Sincerely,

John Patten

(951) 232-5809

## Jessi Roberts

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**From:** katrina jackson <nwckatrina@comcast.net>  
**Sent:** Tuesday, June 16, 2015 7:54 AM  
**To:** Cliff Strong  
**Subject:** RE: Whatcom County CAO changes

Cliff,

In accordance with the current code chapter 16.16 Appendix C the signs accepted include the word "Easement" or letters "NGPE" under current code interpretation signs are now being required placed on the outer boundaries of all wetland buffers whether the wetland/buffers are protected by conservation easement or by notice on title which is general. It would be more correct to allow for wording "Area" or NGPA for "Protected Area" on the signs as not all signs are actually indicating easements. Otherwise if not actually a required easement is in place perhaps the signs should not be required at the same level of marking. Thank you for your consideration in advance.

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**From:** Cliff Strong [<mailto:CStrong@co.whatcom.wa.us>]  
**Sent:** Tuesday, May 26, 2015 3:46 PM  
**To:** katrina jackson  
**Subject:** RE: Whatcom County CAO changes

Thanks, Katrina. I'll talk to staff and the Technical Advisory Committee about this issue and see what they think.

Thanks,

**Cliff Strong**  
Senior Planner  
Whatcom County Planning & Development Services

[cstrong@co.whatcom.wa.us](mailto:cstrong@co.whatcom.wa.us)  
360.676.6907  
[www.co.whatcom.wa.us/pds](http://www.co.whatcom.wa.us/pds)

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**From:** katrina jackson [<mailto:nwckatrina@comcast.net>]  
**Sent:** Tuesday, May 26, 2015 3:36 PM  
**To:** Cliff Strong  
**Subject:** FW: Whatcom County CAO changes

Good Afternoon,  
In regards to the [code](#) rewrite,

I have a pressing matter that has come up in regards to critical areas that are disturbed without a permit, where otherwise a permit would be required.

I have worked through the Army Corps of Engineers and WDOE on matter of disturbance on other sites out of Whatcom County. As long as the mitigation is not a compensatory offset for some form of impact elsewhere (it is a restoration for damage to an area) then the land use follows any other permitting allowances and restrictions.

Please try and think of many examples as to how this needs to NOT be restricted permanently as a [compensatory mitigation](#) as stated in WCC16.16.760 B7. . Someone could go 4 wheeling or logging the whole front 200 feet of their

property (wetland and buffer) or their dump truck could spill its load or have an overlayment event and have no immediate intent of building. An upland building site could be somewhere in the back 200 feet. Or a small wetland could be in the center of a business site, but because of the over spillage at some point in time, if mitigated in Whatcom county, would have to stay in the center of a parking lot forever. The site damage needs to be restored so that it would return basically as close as possible to function as well over time as it did before. That part is simple. The knowledge of the future potential development of the property cannot be determined always at the time of an unpermitted activity. But under the code the full 200 front feet or the small inconveniently located wetland once mitigated would be protected into perpetuity as the code is written. The upland building site would become landlocked. Yes you could plan and put in a driveway as not a mitigated feature, but then what if a subdivision was proposed and a wider driveway or two driveways would be needed etc, or the site rezoned etc. In the interim the way the code is written requires that no mitigation be installed in locations where development may be planned in that location in the future.

The state and federal government jurisdictions have resolved the issue by a restoration for a damage being just that a restoration for the damage. Repair as quickly as possible and reset.

If the mitigation is an offset for permitted impact elsewhere then it stays protected and not made the subject of future development. Chances are that if Washington department of Ecology and the Corp agree on how to manage the restoration for a violation then there is some history which has been tested in the courts as to how to best manage the situation.

Please call me about this matter if you have any questions. I have worked through a few projects with other jurisdictions and can think of no way that a restoration for damage can be turned into a plan that includes a future planned development plan in order to void certain areas from mitigation into perpetuity. Randel Perry may be able to provide the language they use in these type of matters if that would help.

Katrina Jackson



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## Jessi Roberts

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**From:** Linda T <lindat@biawc.com>  
**Sent:** Tuesday, June 23, 2015 10:04 AM  
**To:** Sam (Jeanne) Ryan; Mark Personius; Cliff Strong  
**Cc:** Roger Almskaar  
**Subject:** FW: Request to include citizen science as part of comp. plan and CAO update with regard to HCA  
**Attachments:** Need For Citizen Science Provisions In County Wildlife Programs.updated.doc  
**Importance:** High

Let's not, please, open the door to use of "citizen" science in government. We trust that the county will stick with best available science, done by professionals. Advisory groups are fine, but when there's a call for best available science, it needs to be scrupulously non-biased. If the county accepts "science" from groups with agendas, every other group in the community would have to be alerted and invited to produce citizen "science" to compensate. Please do not open that can of worms. That's what public hearings and advisory committees are for.

If the county did accept citizen science regarding CAO concerns, would permit applicants be allowed produce their own "citizen science" wetlands analysis, etc.? Please consider whether that is your intent.

Thank you,

*Linda Twitchell*

Government Affairs Director

**Building Industry Association of Whatcom County**

1650 Baker Creek Place

Bellingham, WA 98226

360.671.4247 (ph)

[www.biawc.com](http://www.biawc.com)

[lindat@biawc.com](mailto:lindat@biawc.com)



Sam, I don't have the CAO advisory committee's e-mail addresses. Can you please send this observation to them? Thank you.

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**From:** WENDY [<mailto:w.harris2007@comcast.net>]

**Sent:** Monday, June 22, 2015 7:00 PM

**To:** Strong, Cliff; Personius, Mark; Watson, Virginia; Sachs, Laura; Blystone, Kate; Haggith, David; Kentch, Wes; Borders, Audrey; Almskaar, Roger; Grah, Oliver; Ericson, Ryan; McShane, Dan; Steffensen, Wendy; Sim, Pete; Meyer, Susan; Kuhlman, Kara; Dearborn, Amy; Ingram, Joel

**Subject:** Request to include citizen science as part of comp. plan and CAO update with regard to HCA

Attached please find my request to update the CAO and applicable provisions of the comp. plan to include provisions for citizen science. This is a well accepted and respected tool that can assist the county in tracking, monitoring and protecting rural wildlife and habitat.

Wendy Harris

## **Need For Citizen Science Provisions In County Wildlife Programs**

Whatcom County does not have a wildlife characterization and assessment of native and invasive wildlife and habitat necessary to establish a baseline standard. An objective, verifiable baseline standard is necessary to determine if mitigation requirements adequately protect against a loss of ecological function. Even after a baseline standard is created, there will be a need for on-going monitoring and analysis of changes.

**In short, Whatcom County lacks measurable performance standards with regard to its obligation to protect rural wildlife. Until this defect is rectified, county regulations regarding Critical Area Habitat Conservation Areas and SEPA mitigation are meaningless.**

This understandably poses a problem due to staff resources and lack of subject matter expertise. However, a citizen science program requirement could be incorporated into the new county comp. plan update to assist the staff in addressing this inadequacy. A citizen science program provides an important tool to fill and update data and information gaps regarding county wildlife. **I request that a citizen science requirement be incorporated into the comp. plan update regarding the environmental element as well as the Habitat Conservation Area provisions of the Critical Area Ordinance. In support of this request, I offer the below evidence.**

Citizen science is a growing and increasingly important tool in scientific data collection and studies.

<http://www.nature.com/news/2010/100804/full/466685a.html>.

1,000 active citizen science projects are reflected on a Wikipedia page.

[https://en.wikipedia.org/wiki/List\\_of\\_citizen\\_science\\_projects](https://en.wikipedia.org/wiki/List_of_citizen_science_projects). See also [http://education.nationalgeographic.com/education/encyclopedia/citizen-science/?ar\\_a=1](http://education.nationalgeographic.com/education/encyclopedia/citizen-science/?ar_a=1)

Ordinary citizens receive some amount of training and then assist in monitoring and tracking data over long periods of time, or over large geographical areas. This can occur either with or without professional scientist oversight. Citizen science has been the subject of more than 100 published papers and peer reviewed professional studies and is widely respected for its contributions to the field of science, and in particular to the field of conservation and biodiversity.

Washington state has been one of the leaders of citizen science in the field of conservation through its NatureMapping program, a tool that still exists and is available for use by citizen scientists.

<http://www.birds.cornell.edu/citscitoolkit/projects/uofwashington/naturemapping/>:

<http://naturemappingfoundation.org/natmap/projects/wagap/> (Washington Gap Analysis).<sup>1</sup>

Participants report observations of birds, mammals, reptiles, amphibians, nearshore marine, aquatic and terrestrial invertebrates either using Naturetracker data collection software on Pocket PC's or spreadsheets. NatMappers can report observations as individuals or working on field research projects through certified NatureMapping Centers. **These data are used for statewide and local land planning and for communities to learn what in their own backyards**

But many other options and tools for reporting and tracking verifiable data exist. The most successful example of citizen science involves birders who use a computer data program, E-Bird, to cumulatively track global changes in habitat and migration connected to climate change. The E-Bird program is jointly coordinated by the Cornell Laboratory of Ornithology and National Audubon Society. <http://www.birds.cornell.edu/citscitoolkit/projects/clo/eBird/>; <http://ebird.org/content/ebird/>. (In fact, the Cornell Laboratory of Ornithology administers twelve bird citizen science programs, including Project Feederwatch, NestWatch, Celebrate Urban Birds and BirdSleuth.)

**Studies have consistently supported the value and importance of citizen science projects.** Volunteers not only gain experience in making observations and participating in a scientific study, they may also develop a greater sense of stewardship over the populations or sites they are responsible for surveying or monitoring ([Carr, 2004](#)). The broader community benefits from an increased sense of stewardship among the citizen scientists and **from the fact that the data collected can serve to inform local planning and land-use decisions** ([Nerbonne & Nelson, 2004](#)). In addition, when the results of citizen science projects are made accessible to the public, they can help to increase residents' knowledge and appreciation of both their local ecological resources and the scientific process ([Brewer, 2002](#)).

One study, focused on urban citizen science bird counts, concluded that:

The breadth of data that can be collected by an organized group of citizen scientists allows researchers to conduct studies that might otherwise be impossible: Patterns of distribution and abundance can be mapped on a large scale and surveys can be regularly repeated, enabling researchers to monitor changes in populations over time. **Results**

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<sup>1</sup> The Cooperative Fish & Wildlife Research Unit at the University of Washington and the Washington State Department of Fish & Wildlife co-founded the *NatureMapping* Program in 1992 as the public outreach component for the U.S. Geological Survey's Gap Analysis Program (GAP). Its goals were to facilitate the exchange of information on biodiversity among natural resource agencies, academia, land-use planners, local communities and schools through public education and participation in data collection and analysis. Currently, the program has been transferred to the Washington Nature Mapping Foundation.

**from these studies can be invaluable in identifying key areas of ecological importance within a city and tracking how changes in land use and other environmental factors influence bird communities.** As urban areas expand, determining how populations of native wildlife can be sustained in cities is becoming more important. Data collected by citizen scientists can be a vital tool in helping meet this challenge.

Using Citizen Science in Urban Bird Studies; Rachel E. McCaffrey, School of Natural Resources, University of Arizona, Tucson, AZ 85721, 2005.

Whatcom county is fortunate to have several active citizen science projects. These are existing resources in our community that could be tapped with regard to a new citizen science program. Our local Audubon conducts an annual Christmas Bird Count in Bellingham, and the White Rock BC Chapter conducts theirs in Blaine. Additionally, we have extremely experienced birders that enter data into E Bird and take professional quality wildlife photographs. Vikki Jackson has been leading the Whatcom County Amphibian Project. Resources has a nearshore monitoring project.

Citizen science adds an important and missing element to county wildlife review efforts. To the extent that effort is required and made, the staff and consultants rely upon GIS data from other government data bases, most notably Department of Fish and Wildlife. But GIS data only indicates what one is likely to find given the ground cover, land use patterns and geography. It does not confirm what species are actually on the ground and in what concentrations. That requires field observation. And here again, is where a citizen science project would be able to fill important data gaps. And given the new technology of cameras, photographs can be taken that remove doubt about identification and confirm the time, date and coordinates of the field observation.

Finally, the Whatcom County Public Works Department has embraced citizen science and is currently working on a joint stormwater project with the Whatcom County Conservation District. This project will have two components, backyard measurements, and stream monitoring based on citizen volunteers. I do not have information regarding which software programs and tracking devices will be used, but this matter is being coordinated with the WSU Extension Program.

For the above reasons, I hope that the county council and staff will expand the use of citizen science to required efforts to conserve local biodiversity. Please add citizen science requirements and provisions into the update and review of the county comp. plan and the CAO HCA provisions.

Sincerely,

Wendy Harris

Whatcom County Resident



## Jessi Roberts

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**From:** Chris Clark <CClark@whatcomcd.org>  
**Sent:** Tuesday, October 20, 2015 3:09 PM  
**To:** Ryan Ericson; Oliver Grah  
**Cc:** Wendy Steffensen (wendys@re-sources.org); Cliff Strong; George Boggs  
**Subject:** RE: NRCS Conservation Practices

Oliver, Ryan,

The NCRS practices are Subsurface Drain (606) and/or Underground Outlet (620) for “covering” a drainage ditch.

The process for cost share contracting (USDA-NRCS EQIP or state conservation commission) includes consultation with WDFW, Cultural Resources-SHPO, wetlands determination through NRCS....we are willing to add Whatcom County to this list.

Design and permitting follow after contracted...County, WDFW-HPA, Army Corp when applicable,

There is a need to work on relations, communication and mapping (hydrology gis layers)...land disturbance, SEPA, River and Floods....grants and cost share are difficult to line up with fish windows and construction season...

NRCS-Washington is pursuing writing a state standard for the practice of “Covering or Filling in Ditch” ...specifically for improving water quality and maintaining drainage infrastructure. With the definition of improving as: reducing risk for pollutants to enter, eliminate need for reoccurring dredging open ditches, etc.

This practice will not be applicable to fish streams.

However I am pursuing the practice “covering ditch(s)” as way to augment instream flow with the use of the water control structures. The proposed project, reviewed by NRCS and WDFW would have added at least 1 CFS to Bertrand Creek in the upper watershed.

Hope this helps, I look forward to working with you and the CAO to help our cooperators make cleaner water.

Chris Clark  
Agricultural Engineer PE  
Whatcom CD  
815-5359

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**From:** George Boggs  
**Sent:** Tuesday, October 20, 2015 1:50 PM  
**To:** Ryan Ericson  
**Cc:** Oliver Grah; Wendy Steffensen (wendys@re-sources.org); Cliff Strong; Chris Clark  
**Subject:** Re: NRCS Conservation Practices

Good afternoon Ryan

Thank you for the additional context. We appreciate your support for the practice with the limitation you describe. NRCS would further limit in that it would be applicable to the Prior Converted Cropland designated wetlands only. They will not fund improving drainage on the other types of wetlands, nor should they.

In addition to the benefits to surface water, we are encouraging the installation of water control structures as a supporting practice. I've heard from tribal scientists and biologists that it is desirable to keep more water in the watersheds. Ideally, the control structures would be closed post harvest through the winter. They would be opened early enough in the spring to allow drying of the upper root zone for seed bed preparation. After planting, they would be blocked back again. The water levels would be allowed to rise but managed to stay below the root zone. This would prevent the drains from needlessly drying out the entire soil profile.

There is an additional water quality improvement potential. In the winter saturated soils facilitate denitrification. The nitrogen unused by the crop is returned to the atmosphere. Less nitrogen would therefore be carried to surface water and, ultimately the bay, or groundwater. These practices are being increasingly used in the Midwest with demonstrable improvements to loading.

With regard to HCAs, we encourage and fund the installation of hedgerows. They provide litter, protection against temperature increase, pesticide overspray and other benefits. Farmers are resistant to the practice because they are afraid they will not be able to manage them. Older plantings extending out into the fields. When they senesce, they will need to be pruned to reinvigorate. The cuttings could prove to be a significant source of biomass if we get enough of them planted. If plantings are to be promoted and the scorched earth policy discouraged the CAO really needs to accommodate this. Similarly, there is increasing chatter against planting CREP buffers because in doing so you the County will take away your property and farmland will be lost. I have one Board member who has picked up on this and is voting against funding maintenance with the objective of stopping new projects.

I can provide references/reports when I get back to the office Monday. I'm in Denver participating on EPA's Farm Ranch and Rural Communities Committee this week.

George Boggs

Conservation is a complex multivariate choice. . . .not an either/or decision

On Oct 20, 2015, at 1:48 PM, Ryan Ericson <[REricson@co.whatcom.wa.us](mailto:REricson@co.whatcom.wa.us)> wrote:

George,

I would like to add to the discussion some background information. The permit we reviewed and approved did receive an HPA from DFW. The waterbody was considered a non-fish bearing stream. The CAO is not specific on allowing water quality improvement projects in HCA's or their buffers. My request was to allow this activity out right as a water quality improvement BMP. During the application intake the applicant explained NRSC was approving water quality grants and to expect a number of similar projects in the future. I wanted to jump out ahead with the CAO update to ensure these types of projects would be clearly allowed in the future to improve downstream habitat and water quality.

**\*The following is my summary of the conservation\***

Oliver made the comment this would not be appropriate for fish bearing waters or if a CWA violation existed. I asked if it we had a project which was a fish stream would the WQ benefits be a greater benefit than a modified channel without riparian vegetation. We allow culverts for roads and right of way crossings. The length of the culvert was discussed as having more impact than a standard road or right of way crossing. We had a brief discussion and I believe landed on if it was a non-fish bearing stream it may be appropriate; we had to leave the room before a formal conclusion occurred.

The intent of the conversation was to discuss a clear path for WQ BMPs for CPAL projects. The county has not permitted nor has there been an application to place a fish bearing stream in a culvert for purposes of WQ.

Kind Regards,

Ryan Ericson  
Planning and Development Services Supervisor  
p: (360) 778-5937

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**From:** George Boggs [<mailto:GBoggs@whatcomcd.org>]  
**Sent:** Tuesday, October 20, 2015 4:40 AM  
**To:** Oliver Grah; Ryan Ericson  
**Cc:** Wendy Steffensen ([wendys@re-sources.org](mailto:wendys@re-sources.org)); Cliff Strong; Chris Clark  
**Subject:** RE: NRCS Conservation Practices

Good morning

Point of clarification, we do NOT put "steams in culverts" we cover field ditches through prior converted farmland to keep nutrients, pathogens and sediment from entering surface water. I've asked our engineer Chris Clark to connect with Oliver on this practice to answer questions and provide detail.

Cheers  
GEO

Sent from my Verizon Wireless 4G LTE smartphone

----- Original message -----

**From:** Oliver Grah <[ograh@nooksack-nsn.gov](mailto:ograh@nooksack-nsn.gov)>  
**Date:** 10/19/2015 10:57 AM (GMT-08:00)  
**To:** [REricson@co.whatcom.wa.us](mailto:REricson@co.whatcom.wa.us)  
**Cc:** "Wendy Steffensen ([wendys@re-sources.org](mailto:wendys@re-sources.org))" <[wendys@re-sources.org](mailto:wendys@re-sources.org)>, "Cliff Strong ([CStrong@co.whatcom.wa.us](mailto:CStrong@co.whatcom.wa.us))" <[CStrong@co.whatcom.wa.us](mailto:CStrong@co.whatcom.wa.us)>, George Boggs <[GBoggs@whatcomcd.org](mailto:GBoggs@whatcomcd.org)>  
**Subject:** NRCS Conservation Practices

Hi Ryan:

At our last CAO-TAC meeting you mentioned a proposed practice to put long sections of streams in culverts to address ag pollution. Could you please provide background on that proposal? I think you mentioned it was related to NRCS grant funding. If this is the case, could you identify which specific conservation practice this is consistent with and the specific funding source?

Cheers,

Oliver John Grah  
Water Resources Program Manager  
Natural Resources Department  
Nooksack Indian Tribe  
P.O. Box 157  
Deming, WA 98224

360. 592-5140 Ext. 3139  
[ograh@nooksack-nsn.gov](mailto:ograh@nooksack-nsn.gov)



## Jessi Roberts

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**From:** ebinney@pacificecologic.com  
**Sent:** Thursday, July 30, 2015 11:18 AM  
**To:** Cliff Strong; Joel Ingram; Kara Kuhlman; Oliver Grah; Susan Meyer; Wendy Steffensen  
**Cc:** Kate Blystone; Wendy Harris; Heather MacKay; Scott Luchessa; Vikki; Amy Dearborn; Erin Page; Wayne Fitch; Elizabeth Binney  
**Subject:** more info on small wetlands

Hi,

I don't know all that are on Whatcom Co. CAO TAC so am sending this to those I do know. Further studies on prairie potholes (wetlands) continue to indicate the importance small wetlands. Drainage of Prairie Pothole Wetlands Can Increase Flooding and Degrade Ecosystems:

[http://www.usgs.gov/newsroom/article.asp?ID=4268&from=rss#.VbpoP\\_mnx63](http://www.usgs.gov/newsroom/article.asp?ID=4268&from=rss#.VbpoP_mnx63)

What does this mean for the Whatcom Co. CAO update? Best available science to support protecting small wetlands in the county and state. I've been using these recent studies in the Wetlands Ecology course I teach at WWU.

I haven't been able to keep up with all that is being discussed with CAO updates. Hope this information is useful.

Thanks,  
Elizabeth

**Elizabeth P. Binney, PhD, CSE, PWS**  
*Certified Senior Ecologist, ESA*  
*Certified Professional Wetland Scientist, SWSPCP*

Principal - Senior Ecologist  
Pacific Ecological Consultants, LLC  
1833 Summit Street  
Bellingham, WA 98229

Instructor  
Biology & Environmental Science Departments  
Western Washington University.

360-671-2317

## Jessi Roberts

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**From:** Erin Page  
**Sent:** Wednesday, July 22, 2015 4:04 PM  
**To:** Cliff Strong  
**Subject:** FW: HCA Response Letter  
**Attachments:** 2015-07-21 FINAL HCA comment memorandum.pdf

Cliff,  
Please see email below regarding comment to locally important species.  
Thanks,  
Erin

Erin Page  
Whatcom County Natural Resources

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**From:** Burns, Analiese C. [<mailto:acburns@cob.org>]  
**Sent:** Wednesday, July 22, 2015 2:09 PM  
**To:** Erin Page  
**Cc:** LaCroix, Renee S.; Benjamin, Sara Brooke; Weil, Kimberly; Nabbefeld, Kurt D.; Sundin, Steven C.  
**Subject:** HCA Response Letter

Hello Erin,

We appreciate you reaching out to Bellingham's Natural Resources Division as part of your Critical Areas Update. The attached letter provides our input on species and habitats of local importance. If you have any questions, please do not hesitate to call me at the number listed below. If I am out of the office on vacation, feel free to contact Renee or Sara Brooke.

Thank you and I hope you have a wonderful day.

-Analiese

**Analiese Burns, PWS, LEED® AP**  
Environmental Monitoring Coordinator  
City of Bellingham, Public Works Dept.  
Phone 360.778.7968 | Email [acburns@cob.org](mailto:acburns@cob.org)

My incoming and outgoing email messages are subject to public disclosure requirements per RCW 42.56



**City of Bellingham**  
Public Works Department

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## MEMORANDUM

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To: Erin Page, Whatcom County Planning and Community Development  
From: Analiese Burns, Natural Resources Division  
CC: Renee LaCroix and Sara Brooke Benjamin  
Subject: HCA comments for Whatcom County CAO Update  
Date: **7/21/15**

Thank you for requesting the City of Bellingham's input on the locally important species and habitats section of the Whatcom County Critical Areas Ordinance (CAO), Whatcom County Code (WCC) 16.16. We understand your current code update is an important yet challenging task. We appreciate the opportunity to strengthen consistency between City and County regulatory requirements and restoration efforts.

We believe the current HCA section is generally aligned with City code, our knowledge of habitat presence, and on-going restoration efforts. However, we offer the following suggestions to improve clarity and consistency:

- 1) Define the specific level of "listed" species identified in WCC 16.16.710 C 2. To maintain consistency across jurisdictions, you may wish to consider using language similar to "Areas with Which State or Federally Designated Endangered, Threatened, and Sensitive Species Have a Primary Association" (Bellingham Municipal Code 16.55.470 A 1 and WAC 365-190-130).
- 2) Add "All Marine Influenced Pocket Estuaries" to maintain consistency across jurisdictions. This addition is consistent with RCW 36.70A.172(1) which requires local governments to give special consideration to conservation and protection measures necessary to preserve or enhance anadromous fish.
- 3) Specifically list the following Biodiversity Areas and Biodiversity Corridors. These areas and corridors are not currently mapped by the Washington Department of Fish and Wildlife's Priority Habitats and Species (PHS) mapping system; however, they have been identified as important through Bellingham's Habitat Restoration Technical Assessment (2015). Additional support for these features includes the Washington Department of Ecology's Puget Sound Watershed Characterization Project (Maximum of Freshwater Index Components, Local Salmonid Habitats Index, Terrestrial Habitats Index, and/or Terrestrial Open Space Blocks). All other known habitat areas of primary concern to the City of Bellingham appear to be mapped in the PHS system and therefore included as HCAs under WCC 16.16.710 C 3.

- a. Biodiversity Areas
  - i. Squalicum Mountain. This area is an extension of the Squalicum Creek corridor listed below and provides a connection with Lake Whatcom. The north, central, and eastern portions appear to provide greatest connectivity and intact habitat function.
  
- b. Biodiversity Corridors
  - i. Squalicum Creek
  - ii. Little Squalicum Creek
  - iii. Cemetery Creek (extending current PHS Lookout Mountain west to include riparian corridor)
  - iv. Bear Creek
  - v. Baker Creek

Thank you for your consideration. If you have any questions, please do not hesitate to contact me at 360-778-7968.

## Jessi Roberts

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**From:** dena@dayintheparkdesign.com <dbobena@yahoo.com>  
**Sent:** Tuesday, June 02, 2015 6:14 PM  
**To:** Cliff Strong  
**Cc:** Matt Aamot  
**Subject:** Habitat Conservation Area provisions for CAO

Dear Senior Planner Strong:

I understand that the CAC for the Critical Areas Ordinance update will be reviewing the Habitat Conservation Area provisions this week. I wanted to voice my strong support for robust protections for wildlife and habitat in our county. I enclose a small excerpt from information published by the World Wildlife Fund:

"Just to illustrate the degree of biodiversity loss we're facing, let's take you through one scientific analysis... The rapid loss of species we are seeing today is estimated by experts to be between 1,000 and 10,000 times higher than the natural extinction rate.\* These experts calculate that between 0.01 and 0.1% of all species will become extinct each year.  
If the low estimate of the number of species out there is true - i.e. that there are around 2 million different species on our planet\*\* - then that means between 200 and 2,000 extinctions occur every year.  
But if the upper estimate of species numbers is true - that there are 100 million different species co-existing with us on our planet - then between 10,000 and 100,000 species are becoming extinct each year.  
\*Experts actually call this natural extinction rate the background extinction rate. This simply means the rate of species extinctions that would occur if we humans were not around."

To me such figures are as alarming as the knowledge on and dangerous implications of global warming we are gaining more and more insight into.

I feel that we cannot continue to sacrifice wildlife and the resources needed to keep it alive all for the benefit of human comfort, convenience, and the perpetuation of business as usual. Surely we will soon find ourselves with an overwhelming and perhaps planet-threatening number of predicaments such as we have observed in forest management practices, that if continued, would keep us in a never-ending state of fear of extreme wildfire devastation. While we need to provide humans with food, water, and shelter, I believe a serious investment in retaining a biologically diverse region will, in turn, provide more diverse opportunities to thrive on planet earth and feed and house the humans who live here.

Please earnestly consider the following areas of focus and action provided by Wendy Harris which I have included below my signature.

Sincerely,

Dena Jensen  
Birch Bay  
dbobena@yahoo.com

Areas of focus and action provided by Wendy Harris:

I see many ways that both CAO provisions could be revised to provide better protection. One of the most fundamental ways is to require an inventory and review of all county/city wildlife, including migration routes and habitat connectivity corridors. This should be done by a field biologist. Instead, the county/city relies upon GIS data which can only predict

what is likely to be found, not what actually exists on the ground. We do not know what species can be found in what locations and how many individuals compose each group. Without that baseline standard, we have no way to determine if we are achieving no net loss. This undermines any attempt to comply with the GMA.

We also need to understand the concept of urban generalists vs. wildlife specialist. We often hear people state that there is plenty of wildlife, and they point to an abundance of deer, racoons, starlings, crow, etc. However, what we are losing is biodiversity.. an abundance of different species that increases ecosystem services and makes the land and water more resilient. As we increase our urban areas, certain species, urban generalists, increase in size, while other more sensitive species are lost.

We need to understand why much of the fish work being done is really not helpful to ecological function. A primary reason that protecting and restoring fish habitat is so important is that it creates riparian areas which provide habitat and access to water and food for an abundance of wildlife. When we daylight fish streams without creating and protecting the riparian corridors, we are not providing for meaningful habitat and biodiversity.

We really need to establish requirements to set aside habitat specific for wildlife. We have very nice sounding goals and policies in our parks plans and comp. plans, but they are never effectuated. Without mandating actual requirements to protect and restore wildlife, perhaps by a certain % of public land, we will lose any hope of protecting biodiversity. And we also need to ensure that the great myth being perpetrated by local government, particularly COB, that public access and wildlife habitat can co-exist on the same site, is ended.

We are still lacking management policies to avoid human/wildlife conflicts or a mechanism for public input. The county proposed wildlife management committee is a good start, but we need public support for this as there are many voices trying to prevent this from being created.

We need to do a better job of protecting wildlife and habitat of local importance. The Semiahmoo Spit and Drayton Harbor immediately come to mind. They are the only areas in Whatcom County designated by Audubon Society as important bird areas, and as such, they attract Eco-tourists. They also provide crucial habitat for migrating shorebirds. If that habitat is gone, it is less likely that migrating birds will be able to successfully complete their grueling semiannual migration. We should compare a list of the species and habitat protected under the state's priority species to an updated inventory of local wildlife species and fill in any gaps through the species of local importance provisions. For example, all bat species and honey bees should be added to species of local importance if they are not already listed as priority species.

We need to reconsider our treatment of AG land as providing important habitat. The reality is that farmers routinely kill or have killed any predators that are crucial to a healthy ecosystem and they apply toxic chemicals, insecticides and herbicides to their land that is deadly to many animals. If we want to provide incentives, how about incentives for farmers to grow the type of crops that provide food for the winter waterfowl, without the use of dangerous chemicals?

## Jessi Roberts

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**From:** Susan Kaun <kauns49@msn.com>  
**Sent:** Friday, April 03, 2015 7:53 AM  
**To:** Cliff Strong  
**Subject:** Re: Critical Areas Update - Public Comment

April 3, 2015

Whatcom County Planning Commission

Attention: Cliff Strong, Senior Planner

Subject: Critical Areas Update - Public Comment

Honorable Whatcom County Planning Commissioners:

Thank you for your work to review and update the Whatcom County Critical Areas Ordinance. It is an essential way to identify and protect special natural areas that add to our community's well-being, and economic viability.

However, in my opinion a large number of citizens seem to have little or no understanding of what a critical area is, what it looks like, or why it has been designated as such. I often walk greenways trails in Bellingham which are located within the riparian of Padden Creek, a critical area. Many of the people I encounter seem oblivious to the fact that they are in a critical area, and need to take special care.

Evidently thinking it is natural, a great number of them let their dogs loose to run in the riparian, as well as in the Creek of a salmon spawning stream, and the loose dogs defecate anywhere and everywhere. The dogs also chase, stress, and harass wildlife. Best available science indicates that over time the cumulative effects of these actions are impacting the riparian, the fish and wildlife, and the Creek itself.

For the most part it seems that these actions are committed out of ignorance. Therefore, I believe it would be useful as well as educational for Whatcom County and local governments to post signage around designated critical areas and along trails so citizens could learn to recognize the value of these special places, and help protect them.

I also respectfully request that you will consider adding a special section to the Critical Areas Update to clearly spell out that dogs should not be allowed in critical areas, except possibly under the leash control of owners who understand their responsibility to clean up after their animals.

Thank you for this opportunity to comment on the Whatcom County Critical Areas update.

Kind regards,

Susan Kaun  
613 Donovan Ave.  
Bellingham WA 98225  
[kauns49@msn.com](mailto:kauns49@msn.com)

----- Original Message -----

**From:** [Cliff Strong](#)

**To:** [Susan Kaun](#)

**Sent:** Tuesday, March 31, 2015 8:21 AM

**Subject:** RE: Critical Areas Update - Public Comment

You can just send it to me for now. I'm collecting them all.

Thanks,

**Cliff Strong**

Senior Planner

Whatcom County Planning & Development Services

[cstrong@co.whatcom.wa.us](mailto:cstrong@co.whatcom.wa.us)

360.676.6907

[www.co.whatcom.wa.us/pds](http://www.co.whatcom.wa.us/pds)

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**From:** Susan Kaun [<mailto:kauns49@msn.com>]

**Sent:** Tuesday, March 31, 2015 7:40 AM

**To:** Cliff Strong

**Subject:** Critical Areas Update - Public Comment

Is there a site where I can email a comment on the Critical Areas Update for Whatcom County?

Thank you, Susan Kaun

## Jessi Roberts

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**From:** Gaythia Weis <gaythia@gmail.com>  
**Sent:** Tuesday, May 05, 2015 8:52 AM  
**To:** Cliff Strong  
**Subject:** Fwd: Critical Areas Committee for Citizens

Dear Mr. Strong,

I attended the past meeting of the Whatcom Critical Areas Committee for Citizens (I'm not sure of the exact title).

I have a couple of comments:

1. I presented two papers in the short public comments section. This happened to be the day after headlines in the local newspaper stated that a cow had been killed near Kickerville Road, apparently by a cougar. It was my understanding from the moderator that these papers would then be included in a packet for the members of that committee. Has that been done? I've included the links below.
2. My main purpose in attending this meeting was to hear the testimony of geologist Dan McShane. At the start of the meeting the committee got into a discussion about the previous meeting and time spent in ways that apparently some found unproductive and/or denying an opportunity for full exploration of the topics at hand. Kate Blystone noted that Dan McShane had been invited to speak, and sensibly proposed an initiative to postpone discussion of these issues until the next meeting. Rather than calling for the question, the committee chair launched into a discussion of exactly what was not to be discussed until the next meeting. Dan McShane actually had to interrupt the chair to point out that he was there as their guest and only had limited time.
3. It wasn't until later that I learned that the county official at the meeting (Andy?) was a temporary, perhaps last minute replacement. So I don't want to be overly harsh if this was only a one time thing. Still, both he and some other county official both agreed that they had other engagements and could not stay after 5PM. And that seemed to involve a recreational activity, sailing. These are not hourly workers, and so as with other professional employees with which I am familiar from industry, staying until the end of the meeting ought to have been expected. Instead, what happened was that the entire committee adjourned early.

I will not be able to attend tomorrow's meeting and thus will miss part of the Geohazards discussion. I find it personally disappointing, and a poor reflection on Whatcom County processes, that the previous meeting was not held in a more expeditious manner and for the full time allotted. Particularly when time for discussions seems to be a major point of contention.

More on point #1:

In my opinion, scientific papers such as the cougar research I presented, are items that a citizen's committee ought to be aware of and have at their disposal, without necessarily being fully up on the details of the contents. Thus I thought that Andy's suggestion that it be included in a future packet made a lot of sense.

The research paper was:

The point of this paper, as noted in the abstract is that:

*" However, contrary to expectations we found that complaints and depredations were most strongly associated with cougars harvested the previous year. The odds of increased complaints and livestock depredations increased dramatically (36 to 240%) with increased cougar harvest."*

The other paper was a Colorado news story, meant to be both amusing and instructive, on the difficulties of living at the urban/wild interface and getting people to understand the importance of keeping wild animals wild and leery of human contact, while still allowing passage through wildlife corridors. Cougars are not meant to be cute:

[http://www.denverpost.com/breakingnews/ci\\_19138303](http://www.denverpost.com/breakingnews/ci_19138303)

The message, as noted there is:

*"Residents in lion country should take precautions to avoid potentially dangerous encounters, Churchill said, especially pet owners, and families with children."*

*Lions hunt prey to survive and should not be encouraged to visit, Churchill said.*

*People should safely try to scare wild animals off of their property, typically by making loud noises. Motion lights are a good deterrent, Churchill said, and pets, even large dogs, should not be let out alone for long periods."*

The other person making a public comment gave a map of Whatcom County. Their point seemed to be to highlight the amount of eastern Whatcom County that is wilderness. I think this is important information and ought to be part of a committee packet also. I would put a different spin on the meaning of this information though. Whatcom County is a unique place that will always have a nearby reservoir of wild animals. These cannot be shot one by one as they happen to wander past an arbitrary human boundary. Not only is there no wall keeping those areas separate from areas where humans have settled, corridors are needed so that animals can move from one territory to another for needed long term genetic diversity. Such corridors need to be both protected and respected so that the wild animals stay wild as they pass through. This is an important rationale for Critical Areas policies.

Sincerely,

Gaythia Weis  
Bellingham

## Jessi Roberts

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**From:** John Patten <john2patten@gmail.com>  
**Sent:** Wednesday, October 21, 2015 7:37 AM  
**To:** WENDY  
**Cc:** Cliff Strong; Borders, Audrey; Haggith, David; Blystone, Kate; Sachs, Laura; Mark Personius; Almskaar, Roger; Watson, Virginia; Kentch, Wes; Rubash, Bert; McShane, Dan; Ingram, Joel; Kuhlman, Kara; Grah, Oliver; Sim, Pete; Meyer, Susan; Steffensen, Wendy; Amy de Vera; Dannon Traxler; David Onkels; Debbie Vander Veen; Dena; Dick Conaboy; Doug McIntyre; Binney, E.; Boggs, George; Heather MacKay; Jay Irwin; Jessica Shaw; Linda Twitchell; Max & Carole Perry; Michele; Borso, Pam; Estridge, Perry; Scott Luchessa; Vikki; Amy Dearborn; Andrew Wiser; Chris Elder; Erin Page; John Thompson; Matthew Mahaffie; Ryan Ericson; Travis Bouma  
**Subject:** Re: Critical Areas CAC agenda for 10/21/15

I applaud Rogers efforts. I would go even further and eliminate the "net neutral" clause and concept from the code. To say that wetland areas are fixed is to deny the property owner's right to improve his or her property. You can call it BAS or any other thing you like. But ultimately, to put it very, very simply, it is a taking or stealing of building rights that belong to the property owner without reasonable compensation for the taking. It is therefore, a moral issue, not a science issue. Not to mention constitutional. We, of Whatcom County, are above immoral taking of things that do not belong to us. Why even bother to give lip service to preserving property rights, since the code authorizes for them to be taken without compensation. We need to clean this whole thing up.

We should take any time that we need to remove any immoral and "wrongful taking" aspects from the proposed code.

On Wed, Oct 21, 2015 at 6:01 AM, WENDY <[w.harris2007@comcast.net](mailto:w.harris2007@comcast.net)> wrote:

I want to lodge on the record my strong objection to spending time reviewing "Roger's proposal for buffers." These are not science based, do not reflect an accurate interpretation of state law, and attempt to replace BAS with self-interested opinion. Adoption of these proposals will put the county out of compliance and are a waste of our time. We have heard these arguments at literally every single committee meeting, while my written proposals, which do reflect BAS, have been ignored by the committee majority and have not received your support and promotion. The preferential treatment is glaring.

We have serious issues to resolve, some of which reflect compliance problems and I do not want to spend more time listening to biased arguments that fail to fulfill our mission. Frankly, I am really angry that most of my time on this committee has been wasted pointing out all the flaws and problems in Roger's continual attempts to promote his clients' agenda.

General problems with Roger's proposal:

- Roger refers to what he "thinks". That is not adequate replacement for BAS under WAC 365-195-915(1)(c). The county is in compliance where it follows state

standards and Roger asks us to depart from this without quantifiable or verifiable information or data.

- Site specific buffers are contrary to BAS and the policy goals of state and local government. WAC 356-196-830 states that, functions and values must be evaluated at a scale appropriate to the function being evaluated. Functions are the conditions and processes that support the ecosystem. Conditions and processes operate on varying geographic scales ranging from site-specific to watershed and even regional scales. Some critical areas, such as wetlands and fish and wildlife habitat conservation areas, may constitute ecosystems or parts of ecosystems that transcend the boundaries of individual parcels and jurisdictions, so that protection of their function, and values should be considered on a larger scale.
- BAS now establishes that small and disconnected wetlands may have even higher conservation value to habitat and downstream water quality than large higher rated wetlands. This was referenced in the January 2015 EPA final report I previously provided as BAS for the record.
- Habitat scores for wetlands are not an adequate substitute for baseline standards specific to Habitat Conservation Areas, but Roger assumes that they are. See WAC 365-190-130(3). Wetland ratings do not consider species of local importance or biodiversity issues that include common, abundant species. Using the habitat ratings from wetlands to evaluate HCA will not protect functions and values from no net loss.
- Intensity of use for HCA generally refers to human activities and is distinct from evaluation of land use patterns.
- Vegetative covers is **critical** with regard to HCA, which Roger fails to understand.
- The idea of a BAS board is an attempt to interject politics into an objective process. I have previously rebutted the allegation that there is no such thing as BAS. It not only exists, but is clearly and objectively defined in a manner that is not difficult to understand. This will make a muddled mess of critical areas cases, fueling invalid beliefs and resistance to adhering to well litigated and resolved issues of law.
- The BAS board would extend the time spent on CA cases. Is the applicant going to be fully covering all the costs of staff's time and administrative overhead? I object to any form of public subsidy from applicants trying to avoid the law. Why would not everyone give it a try if the cost is low?
- The entire goal of Roger's proposal is not compatible with the purpose and role of critical areas. He wants buffers that preserve buildable land. The goal of the CAO is to protect the functions and values of ecosystems of which a critical area is a part. And staff is incorrect when it asserts this is a balancing test, or that things can be ignored for political reasons. It is a prerequisite to protect critical area ecosystems before construction can occur.

At what point can we move beyond these tired variations on the same theme? This constant focus on Roger's attempts to deregulate the CAO have prevented us from delving into more productive issues.

Wendy Harris

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**From:** "Cliff Strong" <[CStrong@co.whatcom.wa.us](mailto:CStrong@co.whatcom.wa.us)>  
**To:** "Audrey Borders" <[msqly@gmail.com](mailto:msqly@gmail.com)>, "David Haggith" <[dhaggithn3@frontier.com](mailto:dhaggithn3@frontier.com)>, "Kate Blystone" <[kateb@re-sources.org](mailto:kateb@re-sources.org)>, "Laura Sachs" <[laurabsachs@gmail.com](mailto:laurabsachs@gmail.com)>, "Mark Personius" <[MPersoni@co.whatcom.wa.us](mailto:MPersoni@co.whatcom.wa.us)>, "Roger Almskaar" <[almskaarr@comcast.net](mailto:almskaarr@comcast.net)>, "Virginia Watson" <[vwilkenswatson@aol.com](mailto:vwilkenswatson@aol.com)>, "Wendy" <[w.harris2007@comcast.net](mailto:w.harris2007@comcast.net)>, "Wes Kentch" <[wwkentch@comcast.net](mailto:wwkentch@comcast.net)>  
**Cc:** "Bert Rubash" <[kilaruba@copper.net](mailto:kilaruba@copper.net)>, "Dan McShane" <[mcshanedan@gmail.com](mailto:mcshanedan@gmail.com)>, "Joel Ingram" <[Joel.Ingram@dfw.wa.gov](mailto:Joel.Ingram@dfw.wa.gov)>, "Kara Kuhlman" <[KaraK@lummi-nsn.gov](mailto:KaraK@lummi-nsn.gov)>, "Oliver Grah" <[ograh@nooksack-nsn.gov](mailto:ograh@nooksack-nsn.gov)>, "Pete Sim" <[Pete.Sim@bp.com](mailto:Pete.Sim@bp.com)>, "Susan Meyer" <[sume461@ecy.wa.gov](mailto:sume461@ecy.wa.gov)>, "Wendy Steffensen" <[wendys@re-sources.org](mailto:wendys@re-sources.org)>, "Amy de Vera" <[amy.devera@erm.com](mailto:amy.devera@erm.com)>, "Dannon Traxler" <[dtraxler@langabeertraxler.com](mailto:dtraxler@langabeertraxler.com)>, "David Onkels" <[david@onkels.com](mailto:david@onkels.com)>, "Debbie Vander Veen" <[veenteam@gmail.com](mailto:veenteam@gmail.com)>, "Dena" <[dbobena@yahoo.com](mailto:dbobena@yahoo.com)>, "Dick Conaboy" <[zonemaven@hotmail.com](mailto:zonemaven@hotmail.com)>, "Doug McIntyre" <[DDM@vnf.com](mailto:DDM@vnf.com)>, "Elizabeth Binney" <[ebinney@pacificecologic.com](mailto:ebinney@pacificecologic.com)>, "George Boggs" <[GBoggs@whatcomcd.org](mailto:GBoggs@whatcomcd.org)>, "Heather MacKay" <[heather@fhb3.com](mailto:heather@fhb3.com)>, "Jay Irwin" <[irwinlanduse@gmail.com](mailto:irwinlanduse@gmail.com)>, "Jessica Shaw" <[jessica.shaw@wsu.edu](mailto:jessica.shaw@wsu.edu)>, "John Patten" <[john2patten@gmail.com](mailto:john2patten@gmail.com)>, "Linda Twitchell" <[lindat@biawc.com](mailto:lindat@biawc.com)>, "Max & Carole Perry" <[maxandcarole@gmail.com](mailto:maxandcarole@gmail.com)>, "Michele" <[michele@nwecological.com](mailto:michele@nwecological.com)>, "Pam Borso" <[borsope@aol.com](mailto:borsope@aol.com)>, "Perry Eskridge" <[perrye@wcar.net](mailto:perrye@wcar.net)>, "Scott Luchessa" <[Scott.Luchessa@Seattle.gov](mailto:Scott.Luchessa@Seattle.gov)>, "Vikki" <[vikki@nwecological.com](mailto:vikki@nwecological.com)>, "Amy Dearborn" <[ADearbor@co.whatcom.wa.us](mailto:ADearbor@co.whatcom.wa.us)>, "Andrew Wiser" <[AWiser@co.whatcom.wa.us](mailto:AWiser@co.whatcom.wa.us)>, "Chris Elder" <[CElder@co.whatcom.wa.us](mailto:CElder@co.whatcom.wa.us)>, "Erin Page" <[epage@co.whatcom.wa.us](mailto:epage@co.whatcom.wa.us)>, "John Thompson" <[jnthomps@co.whatcom.wa.us](mailto:jnthomps@co.whatcom.wa.us)>, "Matthew Mahaffie" <[MMahaffi@co.whatcom.wa.us](mailto:MMahaffi@co.whatcom.wa.us)>, "Ryan Ericson" <[REricson@co.whatcom.wa.us](mailto:REricson@co.whatcom.wa.us)>, "Travis Bouma" <[tbouma@co.whatcom.wa.us](mailto:tbouma@co.whatcom.wa.us)>  
**Sent:** Friday, October 16, 2015 11:46:20 AM  
**Subject:** Critical Areas CAC agenda for 10/21/15

Please find attached an agenda for next week's meeting. I've already sent you a copy of the whole code as it stands, and will have hard copies available for those who didn't pick it up last meeting. Also attached is a proposal by Roger which he'd like to talk about.

Also, I would like RSVPs from everyone who's planning on attending this time; last time we ended up without a quorum and those who made it did so for no reason as we had to cancel.

Thanks,

Cliff Strong

Senior Planner

Whatcom County Planning & Development Services

[cstrong@co.whatcom.wa.us](mailto:cstrong@co.whatcom.wa.us)

[360.778.5942](tel:360.778.5942) ←**Note new phone number**

[www.co.whatcom.wa.us/pds](http://www.co.whatcom.wa.us/pds)