



State of Washington

Department of Fish and Wildlife, Region 4

Region 4 information: 16018 Mill Creek Blvd, Mill Creek, WA 98012 | phone: (425)-775-1311

December 19, 2024

Skagit County Planning and Development Services
Kelsey Bellavance
1800 Continental Place
Mount Vernon, WA 98273

Dear Kelsey Bellavance:

Thank you for the opportunity to comment on PL24-0402 located at 63254 High Ridge Dr., Marblemount, WA 98267, as proposed by Bob Bailey (Edison Engineering). The Washington Department of Fish and Wildlife (WDFW) is dedicated to preserving, protecting, and perpetuating the state's fish, wildlife, and ecosystems while providing sustainable fish and wildlife recreational and commercial opportunities. In recognition of our responsibilities, we submit the following comments for PL24-0402. Other comments may be offered in the future.

Fish and Wildlife Resources and Recommendations:

- The applicant's proposed reduced stream buffer of 49 ft. does not allow for the system's most basic pollution removal functions (minimum of 100 ft.).

To ensure no net loss of ecological functions and values occurs (WAC 365-190-080), WDFW recommends a buffer width of 204 ft. This buffer is based on best available science which considers soil type and the tallest dominant tree species after 200 years on the site—referred to as the 'site potential tree height' (SPTH²⁰⁰).

More information about recommended riparian management zones and SPTH²⁰⁰ can be found in "Riparian Ecosystems, Volume 2: Management Recommendations" on the WDFW website.

- WDFW recommends taking measures to achieve no net loss of Critical Area habitat (WAC 365-196-830). The attached project plan describes suggestions for adding native vegetation to the site as mitigation for the native vegetation removed, but does not provide a specific plan to achieve no net loss. Please provide a detailed mitigation plan before construction begins for replacing this habitat (WAC 173-26-221).

The Washington Department of Fish and Wildlife provides our comments and recommendations in keeping with our legislative mandate to preserve, protect, and perpetuate fish and wildlife and their habitats - a mission we can only accomplish in partnership with local governments.

If you have any questions or concerns, please feel free to contact me or the local Habitat Biologist, Jess Pyle, at Jess.Pyle@dfw.wa.gov.

Sincerely,



CHRISTIE CALDWELL

Habitat Biologist

Washington Department of Fish and Wildlife

North Puget Sound - Region 4

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