



Skagit County Planning & Development Services

December 26, 2024

Joy Cory
3354 Inverness Street
Mount Vernon, WA 98273

Subject: Critical areas variance for parcel P63965, file #PL24-0402

Dear Ms. Cory,

The public comment period has closed on the Notice of Development Application for Critical Areas Variance application PL24-0402. Listed below are the comments that were received during this time:

1. **Public Comments** – PDS received two public comments. One requesting to be a party of record, the other expressing opposition to the project. No responses to these comments are required at this time.
2. **Agency Comments** – Washington Department of Fish and Wildlife – Staff Contact: Christie Caldwell; Christie.Caldwell@dfw.wa.gov; (564)-676-1383
 - WDFW staff have provided a comment with recommendations. Please see the full comment attached. A response is not required at this time.
3. **Environmental Health, Water** – Staff Contact: Charese Gainor; cgainor@co.skagit.wa.us; (360)-416-1563
 - Public Water System: Cascade River Comm Club
4. **Environmental Health, Septic** – Staff Contact: Greg Geleynse; gregg@co.skagit.wa.us; (360)-416-1556
 - No comments at this time.
5. **Current Planning** – Staff Contact: Allison Sanders; asanders@co.skagit.wa.us; (360)-416-2025
 - The proposed primary residential structure must meet the required 25-foot front setback per SCC 14.16.320.5 (a)(i). If the proposed structure is unable to meet the front setback, a zoning variance is required. A lot certification is required at time of building permit submittal. A title notice for the Waiver of 200' Foot Setbacks for Properties Outside of and Immediately Adjacent to Designated Natural Resource Lands is required at time of building permit submittal.
6. **Fire** - Staff Contact: Bonnie LaCount; bonniel@co.skagit.wa.us; (360)-416-1842
 - No fire codes identified for proposal
7. **Stormwater** – Staff Contact: Shawn Christensen; Shawnc@co.skagit.wa.us; (360)-416-1327
 - No comments regarding the buffer reduction. A revised Geotech report will be required for building\LDA permit approval since drainage will likely be discharging on or near slopes greater than 15 percent. The current report does not appear to address drainage runoff.

8. Natural Resources – Staff Contact: Kelsey Bellavance; Kelseyb@co.skagit.wa.us; (360)416-1334

- Pursuant to SCC 14.24.540(3) - "In all circumstances where a substantial portion of the remaining buffer is degraded, the buffer reduction plan shall include replanting with native vegetation in the degraded portions of the remaining buffer area and shall include a 5-year monitoring and maintenance plan." A revised site assessment and narrative are required.

Please resubmit the following information:

- A revised site plan showing the required 25-foot front zoning setback, and the proposed location of the septic tank and drainfield onsite.
- A revised site assessment including mitigation for the degraded buffer areas onsite, pursuant to SCC 14.24.540(3). See markups in the report for details.
- A revised narrative addressing comments made about answers to questions 11, 12, and 15. See markups in the narrative for details.

The requested information needs to be received by our department within 60 days of the date of this letter as required by Skagit County Code 14.06.170. Non-responsiveness for 60 consecutive days may result in 30 days being added to the Review Time Period. Once our department receives the above referenced information, review of this project will continue.

Please let me know if you have any questions.

Sincerely,

Kelsey Bellavance

Kelsey Bellavance
Associate Planner



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

Christie.Caldwell@dfw.wa.gov

(564) 676-1383