

August 20, 2024

Michael Cerbone
Community Development Director
City of Ferndale
P.O. Box 936
Ferndale, WA 98248

RE: CRITICAL AREAS ORDINANCE and/or COMPREHENSIVE PLAN PERIODIC UPDATE

Dear Michael Cerbone,

On behalf of the Puget Sound Partnership's (PSP) Ecosystem Coordination Board (ECB), we submit this letter with respect to your jurisdiction's current periodic update process, and associated updates to development regulations. The Puget Sound Partnership's Ecosystem Coordination Board supports the Leadership Council in carrying out its duties, including the development and implementation of the [Action Agenda](#). The ECB is made up of 33 members, representing local, state, federal, and tribal governments, environmental and business interests. This broad representation supports the ECB to provide cross-caucus reporting and dialogue on priority issues, such as how to ensure the protection and restoration of habitat for ecologically sustainable watersheds for the future of all species through local periodic updates. This letter provides background on the priorities described in the Action Agenda and the resources available to support Comprehensive Plans and Critical Areas Ordinances to align with those priorities. While this letter does not respond to materials produced as part of your comprehensive plan update, it does offer many specific recommendations and resources that we believe will support the protection and recovery of the Puget Sound.

The recovery of Puget Sound is vital to human wellbeing in the region, to sustain threatened salmon, orcas, and numerous other species, and to preserve Puget Sound's ecosystem functions and values for current and future generations. But the Puget Sound ecosystem is under increasing threats from the development of ecologically important habitats, forests, farmlands, and other working lands, especially outside of urban growth areas. The [smart growth strategy](#) in the [2022-2026 Action Agenda](#) identifies a key opportunity to "improve the implementation of the Growth Management Act within local jurisdictions land use planning and decisions, and across jurisdictions to include the protection of natural areas and working lands."

New planning requirements, updated science, and learning from the past ~8 years of Growth Management Act (GMA) implementation make this round of Comprehensive Plan updates a critical juncture and inspiring opportunity in our region's collective work to recover Puget Sound. As you know, the Comprehensive Plan sets the stage for development activities and decisions which all have an impact on how well we achieve our goals to protect and restore Puget Sound. To support recovery of the Puget Sound, we recommend

that jurisdictions in the Puget Sound region make use of the many science-based resources available to support development of Comprehensive Plan and Critical Area Ordinance (CAO) amendments that protect natural areas and working lands.

Our collective understanding of the complex relationships between land cover, development, and ecosystem health improves over time, and this is why cities and counties must include current, best available science and information in their local land use planning amendments during the periodic update. Fortunately, our state Departments of Fish and Wildlife, Ecology, Natural Resources, and Commerce have been busy updating and distributing science-based guidance to support local governments in this process. Cities and counties should leverage these resources below, and other science-based resources, to effectively amend their Comprehensive Plans and Critical Areas Ordinances:

- [Local Integrating Organizations \(LIOs\) and LIO Ecosystem Recovery Plans](#)
- [Local Salmon Recovery Watershed Chapters](#)
- [Department of Fish and Wildlife's current Priority Habitats and Species information](#)
 - [Riparian Management Zone Checklist for Critical Areas Ordinances](#)
- [Ecology's Wetland Guidance for Critical Areas Ordinance \(CAO\) Updates](#)
- [Ecology's Climate Resilience and Shoreline Management webpage](#)
- Commerce's Critical Areas [Handbook](#) and [Checklist](#)

To ensure smart growth in the Puget Sound region, the ECB recommends that jurisdictions consider and take action on the following:

- 1) **At key points in the Comprehensive Plan update process, review and apply the [Sound Choices Implementation Checklist](#).** The checklist was developed by the Puget Sound recovery community and is intended to help local jurisdictions make updates to their comprehensive plans that align with Puget Sound recovery strategies and actions.
- 2) **Ensure your local planning department takes advantage of funding for additional staff resources to incorporate salmon and Puget Sound recovery into local planning by applying for the [Salmon Recovery through Local Planning Grant Program](#).** Depending on funding availability, Washington State Department of Commerce will hold a fall 2024 round of funding. For more information contact angela.sanfilippo@commerce.wa.gov.
- 3) **Understand how your local land use decisions will support region-wide efforts to achieve positive trends in [Regional Land Use Indicators](#).** The Puget Sound Partnership assesses the status and trends of threats through a set of regional land use indicators.
- 4) **Reach out to and involve local experts in Puget Sound recovery** including Local Integrating Organization members, Salmon Recovery Lead Entities, as well as your [local representative](#) on the [Ecosystem Coordination Board](#). For additional support in facilitating connections with these local experts please reach out to Laura.Rivas@psp.wa.gov.

As you help shape the future of the City of Ferndale at this pivotal moment in time, the ECB requests that you take advantage of the valuable tools and resources included in this letter to ensure we are doing all we can to support our local communities and Puget Sound recovery. Thank you for considering our recommendations, tools, and resources.

Sincerely,



Julie Watson, Chair

Cc:

Bill Dewey, co-Vice Chair Ecosystem Coordination Board

Ellen Southard, co-Vice Chair Ecosystem Coordination Board

Mark Personius, Whatcom LIO representative on the ECB

Rebecca Schlotterback, Whatcom LIO alternate representative on the ECB

Becky Peterson, Whatcom LIO Coordinator