



LUMMI NATION

COMMUNITY PLAN

November 27, 2022



THE LUMMI NATION

The Lummi Nation is a signatory of the 1855 Treaty of Point Elliot and is a federally recognized sovereign Indian Tribe organized pursuant to an order approved on November 13, 1947 by the Acting Commissioner of Indian Affairs. The Lummi Nation is governed by an elected 11-member council, the Lummi Indian Business Council (LIBC), and the General Council which consists of all enrolled Lummi tribal members of voting age (18 years old). The LIBC is supported by administrative departments including Planning and Public Works, Economic Development, Police, Office of the Reservation Attorney, Cultural Resources, and Natural Resources.

Under the articles of the 1855 Treaty of Point Elliott (Treaty) the Lummi Nation ceded certain areas of its aboriginal lands

to the United States and reserved for its use and occupation certain lands, rights, and privileges; the United States assumed fiduciary obligations, including, but not limited to, legal and fiscal responsibilities to the Lummi Nation.

An aboriginal right retained under the Treaty includes the immemorial custom and practice to hunt, fish, and gather within all usual and accustomed (U&A) grounds and stations. The Lummi Nation U&A includes the marine areas of northern Puget Sound from the Fraser River south to the present environs of Seattle, particularly Bellingham Bay. Freshwater fisheries include the river drainage systems, especially the Nooksack, emptying into the bays from Boundary Bay south to Fidalgo Bay. (Lummi Nation, 2019)

ACKNOWLEDGEMENTS

Lummi Indian Business Council

Planning Department

Consulted Departments

Behavioral Health
Communications
Education
Family Services
Funding Development
Health Clinic
Health Policy and Compliance
Healthcare Business Office
Human Resources
Information Technology
Kwenanget-s
Natural Resources
Public Works
Records & Archives
Workforce Development
Youth Services

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Lummi fisherman.

Photo credit: Damon Winter/The New York Times/Redux.



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*Paddle to
Squaxin, 2012.*



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Kwina Mile, 2014.

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SOVEREIGNTY DECLARATION

Through Resolution #2021-009, the Lummi Indian Business Council adopted the following policy statements around planning and land management that is relevant to this community plan.

The Lummi People endorse the principles of sovereignty and self-governance, and desire to foster self-reliance and self-determination by strengthening internal technical and administrative capabilities; and

The Lummi People view protection of the tribal land base as essential to the vitality of the Lummi culture-past, present and future; and

The Lummi People wish to promote, through wise stewardship, the sound use and development of the tribal land base including but limited to tidelands, trust lands, and fee lands in such a way that tribal values, economic prosperity, and public health and safety are all enhanced but not at the cost of sustainability nor at the expense of preservation of traditional culture, teachings, standards, and values; and

The Lummi People choose, by exercising powers of self-government, to assert jurisdiction over all land development activities within the exterior boundaries of the Lummi Reservation; and trust and fee lands owned outside the exterior

boundaries of the Lummi Reservation in order to ensure compliance with tribal policies, codes, regulations, and traditional laws.

It is the policy of the Lummi Nation:

1. To collect and maintain comprehensive information about reservation and other tribally owned lands, provide real estate services for tribal members, coordinate permit processing, and spearhead the development of long-range tribal land use plans; and
2. To plan for, coordinate, and carry out tribal construction projects in a cost-effective manner, making maximum use of qualified tribal members and other qualified Indians; and
3. To assist tribal families in obtaining affordable housing, through the implementation and administration of public and quasi-public housing projects and programs, that are designed in conjunction with and consideration of tribal standards, value systems, and traditional societal & familial associations and develop a plan for the care and needs of the homeless; and
4. To plan for, construct, maintain, and regulate a self-sustaining sanitary sewer system and potable water system to serve all people of the reservation, which includes the goal of having a Sanitarian to serve the needs of the Nation; and
5. To plan for and carry out maintenance and repair of tribal land and tribal facilities; and
6. To use credits from/and comply with the Wetland and Habitat Mitigation policy for current and future planning and land management use plans; and
7. To ensure compliance with the approved Planning documents, including but not limited to: the Comprehensive Land Use Plan, the Parks, Recreation and Open Space Plan, the Transportation Plan, and the Lummi Design Standards for building; and
8. To continue the efforts of expanding the land base to support the growing tribal member population and to further develop land for economic development; and
9. To plan for, coordinate and carry out measures to ensure public health and safety of the roads, infrastructures, land and transportation; and

10. To recognize Food Sovereignty as a right to the people to define and have access to healthy and culturally appropriate food that comes from the land and,

11. To develop plans for emergency response and preparedness.

The Lummi Nation supports the implementation of appropriate programs and the use of available funding to further the principles and policy objectives identified herein.

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1 PLAN FOUNDATION

Introduction

*Lhaq'temish—
"People of the Sea" and "Survivors of the Flood"*

The Lummi People are the original inhabitants of Washington's northernmost coast and southern British Columbia. The Lummi Nation is a federally recognized sovereign Indian Tribe serving over 5,200 members and managing nearly 13,000 acres of tidelands on the Lummi Reservation. The Lummi People carry forward the culture, wisdom, and traditions of our ancestors and elders, and journey to a future of stewardship and prosperity for all Lummi people.

To honor our past, make wise decisions in the present, and steer our future, this Community Plan sets forth a comprehensive vision for the stewardship of the Lummi Reservation, wellbeing and prosperity of the Lummi people, and effective governance that creates the best future for all.

Exhibit 1-1. Lummi Nation Past, Present, Future



Source: Lummi Nation.

Community Plan Vision

We are the Lhaq'temish, The Lummi People. We are the original inhabitants of Washington's northernmost coast and southern British Columbia. For thousands of years, we worked, struggled and celebrated life on the shores and waters of Puget Sound.

We are fishers, hunters, gatherers, and harvesters of nature's abundance. We envision our homeland as a place where we enjoy an abundant, safe, and healthy life in mind, body, society, environment, space, time and spirituality; where all are encouraged to succeed and none are left behind.

Plan Organization

The Lummi Nation Community Plan was developed to serve as a strategic planning document to guide the future of the Lummi Nation. Community-driven investments and actions and programs by the Lummi government are the Plan's chief focus, guiding the Lummi Indian Business Council (LIBC) to improve the lives, lands and legacies of the Lummi Nation now and in the future.

The Plan's benefits include:

- Greater community participation and input in Nation governance
- Identification of mutually reinforcing short- and long-term actions that can increase collective impact
- Greater coordination and collaboration across departments
- Guidance for implementing policy changes and programs, such as budgets and resource allocation, zoning and development standards

The Community Plan lays out a series of goals, polices and actions across a range of topics to provide a roadmap that can guide actions and investments to realize the community vision.

This Plan contains a series of elements addressing goals, policies, and actions to guide the Lummi Nation decisions, services, and investments. The Chapters of this Plan include:

- Chapter 1: Plan Foundation
- Chapter 2: Culture
- Chapter 3: Natural Environment & Sustainability
- Chapter 4: Economic Development
- Chapter 5: Community Design Framework
- Chapter 6: Land Use
- Chapter 7: Housing & Homelessness
- Chapter 8: Transportation
- Chapter 9: Parks & Public Spaces
- Chapter 10: Public Facilities & Infrastructure
- Chapter 11: Youth & Education
- Chapter 12: Health & Wellness
- Chapter 13: Justice & Safety
- Chapter 14: Implementation & Monitoring

KEY TERMS

Plan chapters address unique topics, describe issues and trends, set forth plans to address needs, and establish goals, policies, and actions.

Goals identify aims or objectives.

Policies provide guidelines or methods to fulfill goals.

Actions are tangible and strategic steps to accomplish goals and fulfill policies.

This Community Plan documents a community visioning process and acts as the voice of the Lummi People. The visions, goals, policies and action steps described in the Plan are based on community feedback collected through a broad and inclusive public outreach process. In addition to enrolled Lummi Nation members, elders, youth, fishers, and Nation staff were consulted.

Plan Area

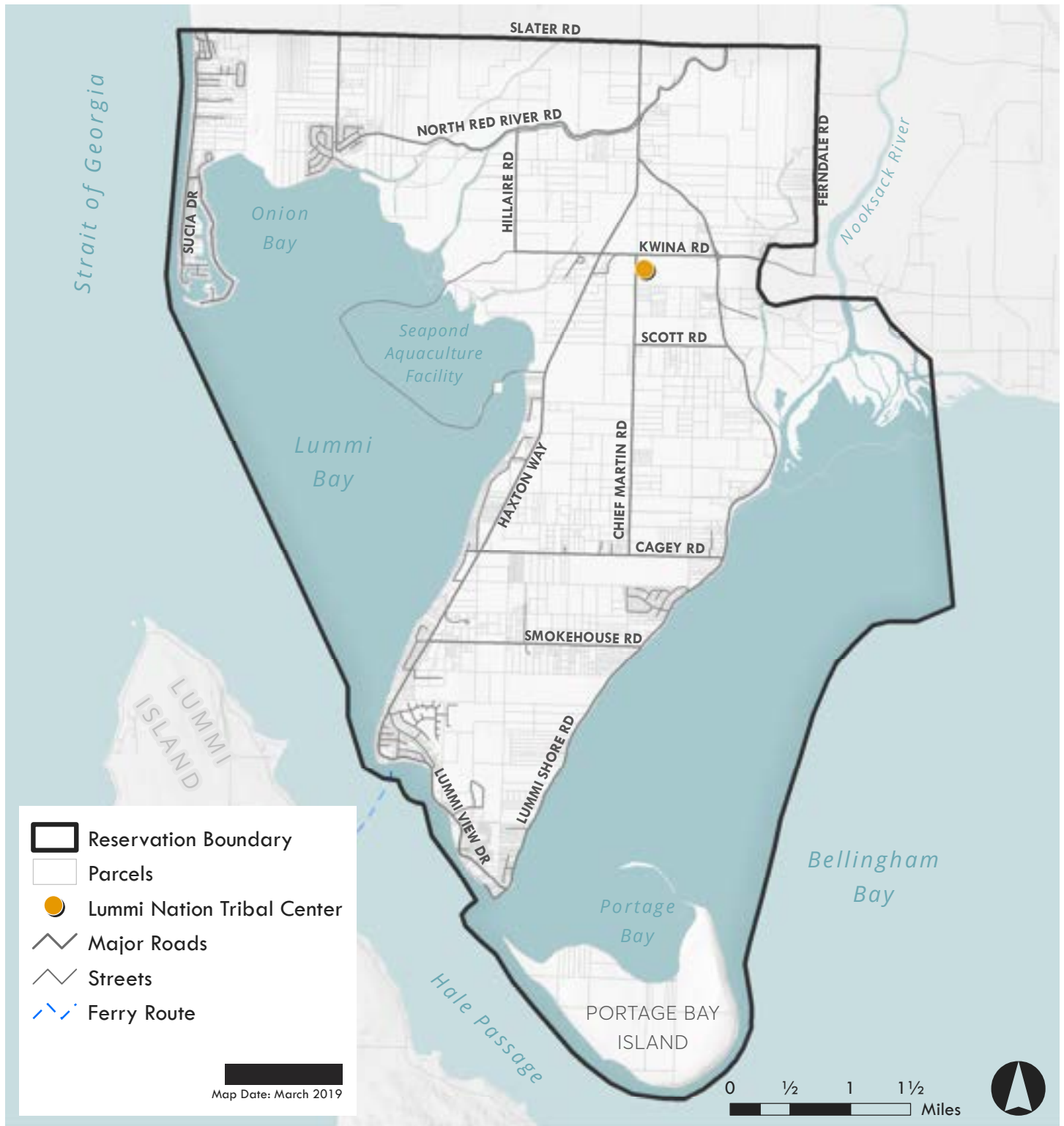
The focus of this Community Plan is land within the exterior boundary of the Lummi Reservation, owned by the LIBC, individual tribal members, or by non-Indians. See **Exhibit 1-2**.

The Nations' Treaty rights including its usual and accustomed (U&A) grounds and stations beyond the Reservation are addressed in the Plan too. The Lummi Nation U&A includes the marine areas of northern Puget Sound from the Fraser River south to the present environs of Seattle, particularly Bellingham Bay.

Population

Based on data from the Lummi enrollment office, the Lummi Nation currently includes an enrolled population of 5,258. This includes 2,920 members on reservation, 959 members living in Whatcom County but off reservation, and 1,379 members living outside Whatcom County. See **Exhibit 1-3**.

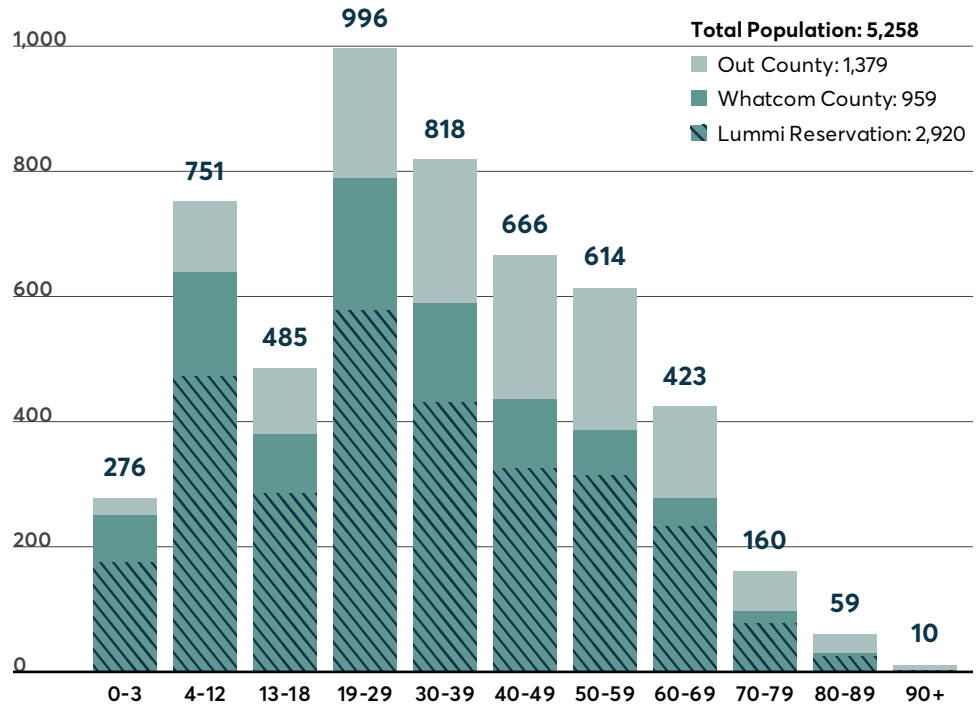
Exhibit 1-2. Lummi Nation Reservation: Plan Focus Area



Sources: Lummi Nation, 2019; BERK, 2019.

Exhibit 1-3. Lummi Nation Population by Location of Residence, 2018

Source: Lummi Nation Enrollment Office Population Report, 2018.



Population Growth

Comparing recent growth rates with actual tribal enrollment numbers, the 2015 Comprehensive Land Use Plan (CLUP) projects that by 2035 a total population of 12,200 tribal members and their non-enrolled family members should be addressed in the plan; more than doubling the current total population of approximately 5,258, and close to four times the number of tribal members living in Whatcom County including on the Reservation of 3,879. See **Exhibit 1-3**.

Previous Planning Efforts

The Lummi Nation has produced several collective vision and long-range planning documents over the past 20 years that involved extensive community outreach and engagement. This Community Plan is informed by these previous efforts. These plans are united by their goal of fostering a prosperous and healthy Lummi Nation.



The first Community Plan was adopted in 2005 and used to guide actions and decisions in the Lummi Indian Business Council (LIBC). In 2010, an update was prepared to provide an assessment of the services and government of the LIBC compared to the vision, issues/concerns, and goals/objectives identified in the Community Plan.

The Lummi Nation Ventures Promoting Prosperity Plan produced in 2005 sets a vision for the economic development strategy on the Reservation. This report, grounded in extensive community outreach, identifies Lummi assets and sets a long-range plan for capacity building.

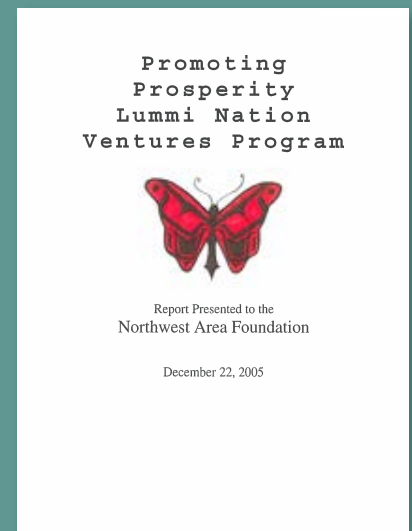
In 2002, Lummi Visions 2055 sets long-range goals and development plans for the Lummi Reservation community. It includes a planning report for incorporating anticipated growth over a 20-year timeframe. Many of the identified needs and priorities, such as resource conservation and workforce development, remain a focus for the Community Plan today.

More recent planning efforts include the Comprehensive Land Use Plan (CLUP) of 2015 and the draft version of the 2019 Transportation Plan. These documents identify current issues in resource management and mobility, setting an updated policy framework for the future. The guiding principles of these plans are integrated into this Community Plan.

LUMMI NATION VENTURES PROGRAM

This 2005 document focuses on asset identification and capacity building among Lummi Nation members. Many of its identified priorities and strategies remain relevant today.

- Build upon existing assets including NWIC, CDFI, and the Lummi Nation School
- Development of small businesses
- Workforce development connected to prosperous career opportunities
- Expand and improve daycare network
- Reduce poverty and provide support to low-income families



Community Outreach & Engagement

Inclusive community participation was an essential part of developing this Community Plan. Starting in summer 2019, the Community Plan project team reached out to a broad and diverse range of community members and invited them to participate. Participants were limited to tribal members and included elders, youth, fishers and other members of the community. Outreach and engagement efforts were extensive and included the following:

- Online Vision Survey—approximately 139 responses including 86 enrolled members
- Community Conversations—11 meetings with a total of 283 members
- Interviews—11 interviews with 9 members
- Pop-Up Events—4 events with 21 members
- Commission Meetings—4 meetings
- Informational Briefings—10 briefings

These efforts took place over the course of 10 months and involved over 399 Lummi members.

Across these efforts some common themes emerged including:

- **The need for more diverse housing types at affordable price points.** During outreach, many tribal members indicated a need for more diverse housing types that are affordable and located with easy access to transportation. They also referenced the limited availability of affordable housing, especially smaller units. The need for a more diverse set of housing options was specifically referenced by young families, as well as elders who want to age in place and live independently. Housing quality was a concern, and many talked about the poor quality of available affordable housing.
- **Preserving and strengthening culture.** Tribal members see preserving and strengthening Lummi culture as a key priority. Balancing economic growth with traditional values and ensuring cultural education is available to youth are issues that are important to tribal members.
- **Environmental stewardship.** Many tribal members raised the need to caring for the water, land, air, fish, wildlife, and plants, both as part of the Lummi culture as well as a sustainable path to future development. Environment restoration, and cleanup, are thus key priorities for tribal members.

- **Youth and early childhood support.** The Lummi Reservation has high proportion of young people under the age of 19. Tribal members recognize this youth as strength and indicated the need for supportive programs and amenities, including physical spaces for social activities, programs to prevent substance use disorder as well as high-quality daycare, preschool, and before and after school programs.

These themes will be central to the Community Plan, ensuring that the vision aligns with core values of Lummi people.

Online Vision Survey

An online Vision survey was posted and advertised to tribal members. There were 139 responses to the community survey, which was distributed both online and in hard copy. The online survey was open from June 2019 to November 2019 and was accessible by digital devices including phones.

About 86 of these responses came from enrolled Lummi members. The remaining respondents did not respond to the question or indicated they live or work on the Reservation. The survey focused on community issues and priorities, economic development strategies, and preference for type and location of new development. The below results display feedback from tribal members.

Survey-Based Community Issues & Priorities

Top priority issues identified for the community are:

1. Retaining culture
2. Conserving salmonid habitat and other marine resources
3. Providing affordable housing opportunities
4. Creating economic opportunities and jobs

When asked what should be added or improved in the community, responses reinforced themes of affordable housing, preserving culture, and natural resource preservation. These themes will be central to the Community Plan, ensuring that the vision aligns with core values of Lummi people. Additional priorities were revealed with written "other" comments.



Events like Paddle to Lummi help strengthen cultural ties for today's Tribal members. This annual event honors the heritage of Coast Salish people by tracing historic canoe routes and engaging in traditional song, dance, and storytelling customs.

SAMPLE WRITE-IN RESPONSES:

"Elders' wisdom and stories for future generations are our greatest asset."

"Elders and children are our greatest assets."

"We are culturally blessed. Culture is our biggest asset."

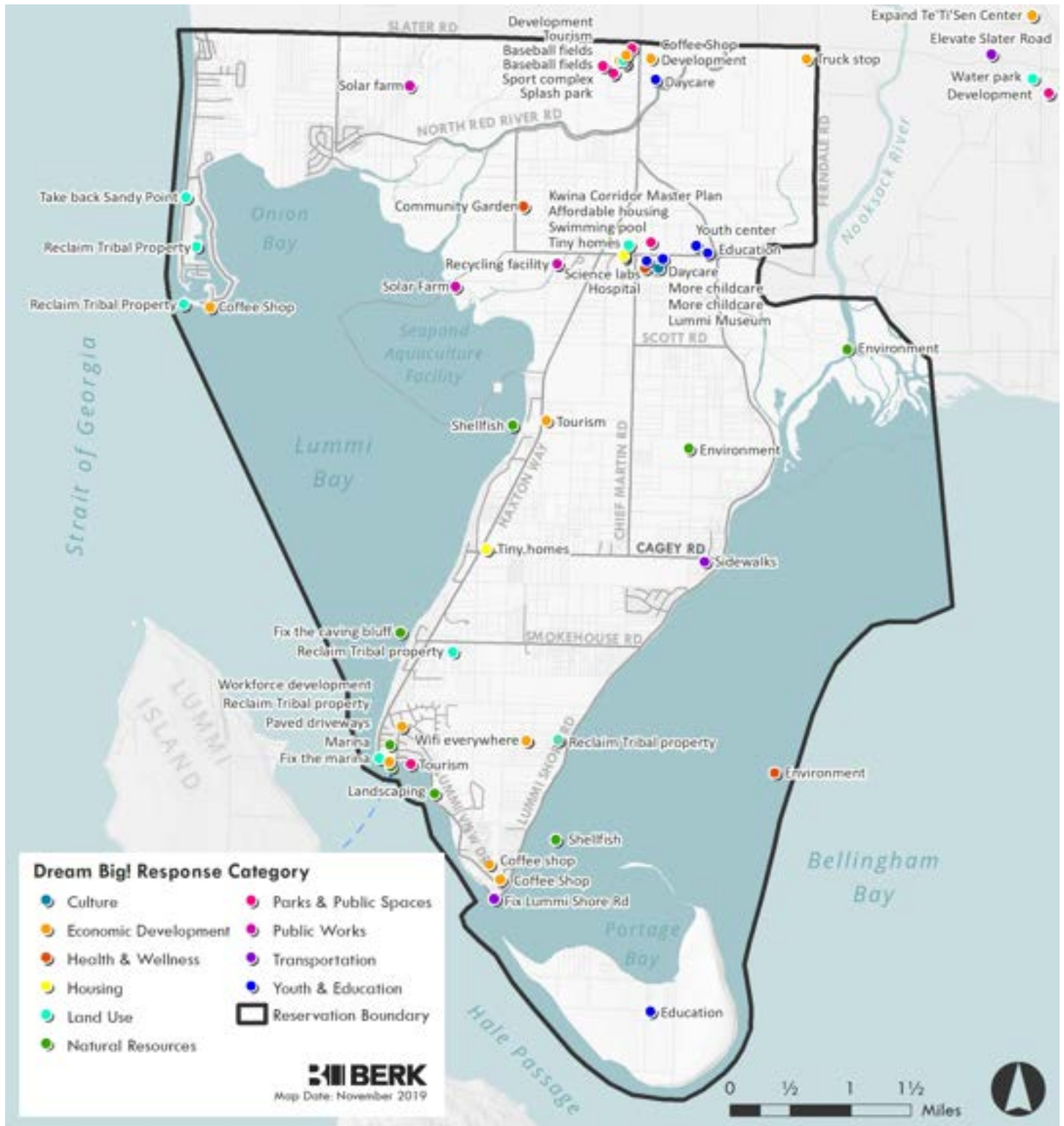
"Make Lummi leaders again, not followers."

"We all deserve a place to call HOME!"

"Housing for all community members is my dream."

"We need small housing for homeless and single members."

Exhibit 1-4. Dream Big! Imagine you can change or improve any aspect of the community. What would you want to see and where? (n=44)

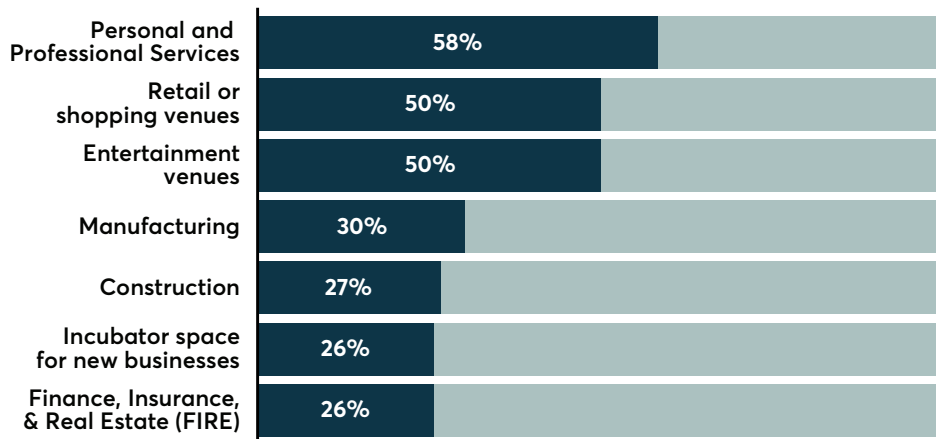


Source: Lummi Community Survey, 2019.

Economic Development Strategies

The top economic development strategies prioritized by survey respondents were to increase job training programs and support for small businesses. When asked about the types of new jobs or businesses that should be encouraged, top responses were Personal Services (e.g., law, medicine, design, engineering, daycare), Retail or Shopping venues, and Entertainment venues. See **Exhibit 1-5**.

Exhibit 1-5. What kinds of new jobs or businesses should be encouraged? (n=77)



Source: Lummi Community Survey, 2019.

SAMPLE WRITE-IN RESPONSES:

"Build a shopping center"

"A tribal owned grocery store"

"I would like to see restaurants, a community pool, and splash park/swim parks"

"Job opportunities for Tribal members with a record"

"Support for artists"

"Build more rentable spaces...I would love to have a commercial kitchen for rent"

"Put lights on sidewalks on every road."

"I would like to see the proper wiring installed so the entire reservation has access to high-speed internet."

"Job training"

"Provide training for youth who don't want to go to school."

Parks & Recreation

Responses about recreation amenities and park space prioritize introducing new entertainment venues, playgrounds, and trails. Several write-in responses voiced support for pools and other water-based amenities, such as splash parks. See **Exhibit 1-6**.

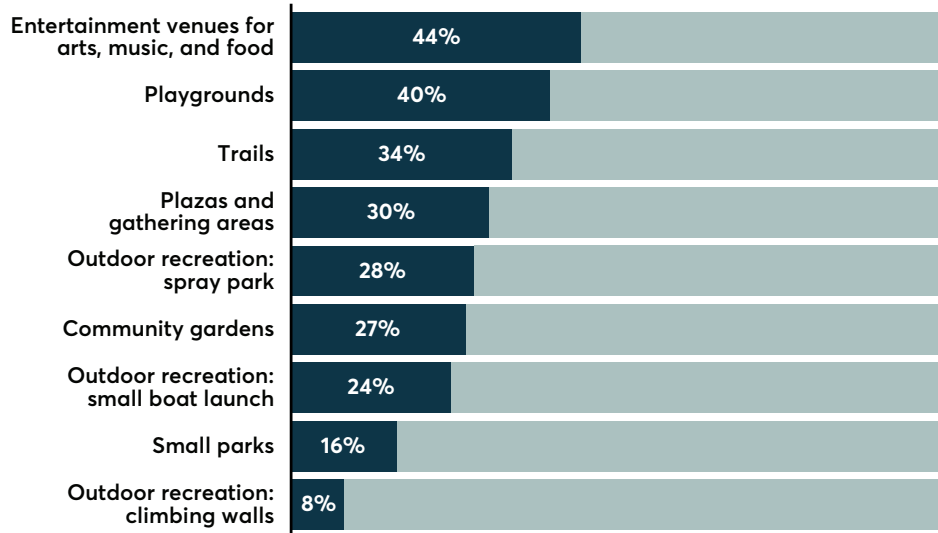


Exhibit 1-6. What kinds of parks and recreation amenities would you like to see? (n=80)

Source: Lummi Community Survey, 2019.

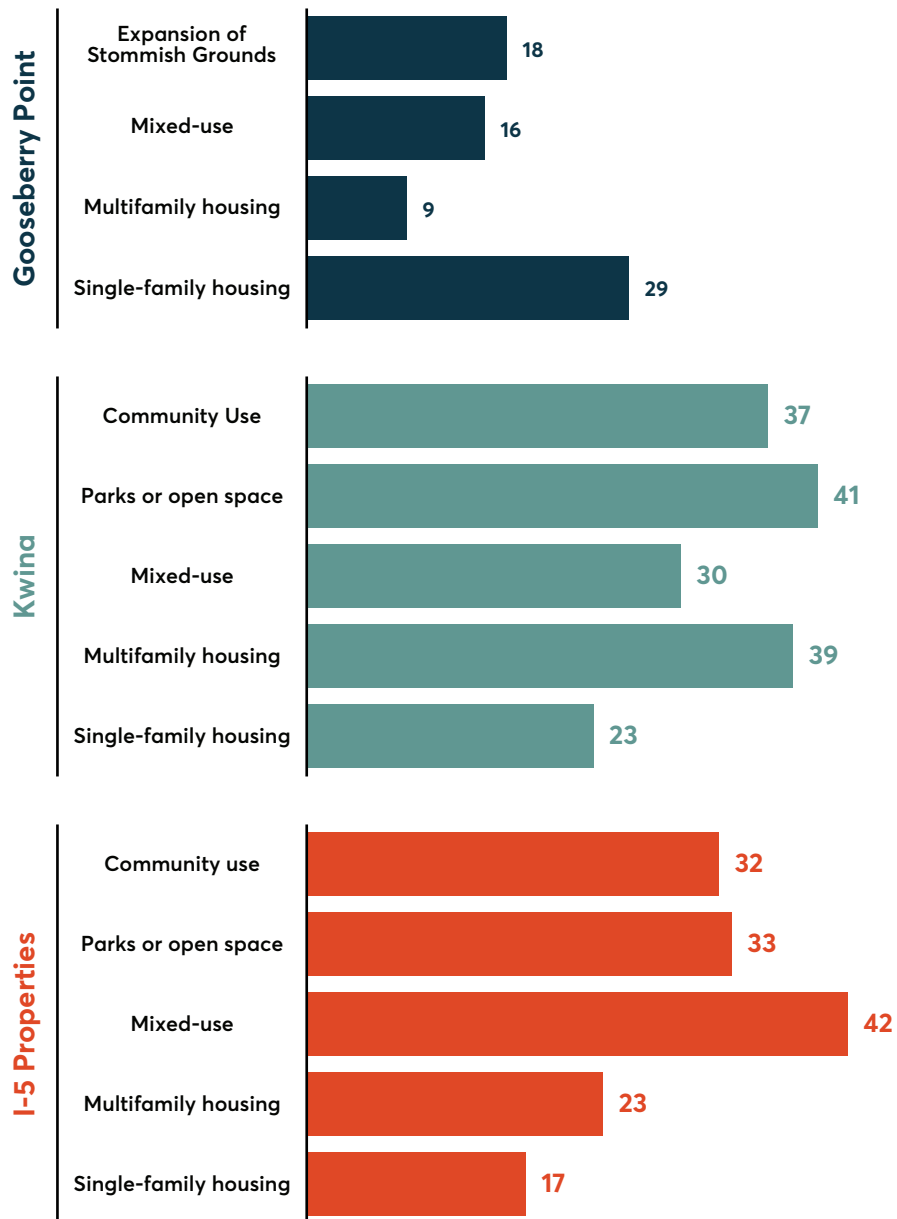
New Development

The survey focused questions for development in the areas of Gooseberry Point, Kwina, and the I-5 properties. In general, Gooseberry Point was selected as a good place for environmental and low-density housing, Kwina for park space and higher-density residential, and I-5 properties for commercial development. Responses for all areas expressed a desire to incorporate a diversity of uses and public amenities were considered appropriate for all three locations. See **Exhibit 1-7**.

Exhibit 1-7. What is the right type of future growth for the following areas? (n=72, 79, 68)

Source: Lummi Community Survey, 2019.

What is the right type of future growth for...



Community Conversations

To support the community planning process, the project team conducted community conversations or small group discussions during summer and fall 2019 to gather input. These included the following events:

- Community Meeting at Little Bear Creek
- Community Meeting—Kwenanget-s Department
- Sobriety Parade and Lunch—Lummi Stommish Grounds
- Northwest Indian College—Student Clubs event
- Try-A-Trade—Held at Ferndale and Slater Roads (Firework Stand Location)
- Back to School Bash—Ball field next to NWIC
- Meeting at Canoe Journey
- Community Meeting at Kwina Village
- Community Meeting at Mackenzie ROC
- Community Breakfast—Community Building
- Community Event at Lummi Food Bank

This was supplemented with in-person outreach, such as door-to-door outreach to residents, and organization-wide broadcast emails from the LIBC, to invite broad participation in the community conversations. Roughly 300 people participated in these events.

Results of the conversations reflected community needs and desires around housing, especially for smaller housing types, affordable units, and inter-generational housing. Transportation both within the Reservation and outside to job centers was also a strong theme.

Interviews

Between June and November 2019, the project team interviewed eleven stakeholders knowledgeable about the Lummi Nation to gather additional insights. The interviewees include the following:

- Cynthia Cartwright, Director, Legal Department
- Chris Ranallo, Director, Information Technology
- Tara Olson, Lummi Clinic
- Ronald Finkbonner, Tribal Employment Rights Office (TERO)
- Tim Ellis, Public Works Department

- Gloria J. Point, Loan Officer, Lummi Community Development Financial Institution (CDFI)
- Laura V. Williams, Executive Director, Lummi CDFI
- Nancy Jordan, Capacity Developer, Lummi CDFI
- Sunshine Fitzgibbon, Director, Economic Development
- Diana Phair, Lummi Nation Housing Authority
- Nickolaus Lewis, Lummi Stepping Stones

Interviewees shared their insights into community desires and dreams as well as their perspective on how to make the Community Plan more actionable. Housing affordability, preserving culture, and homelessness were identified as major issues to address. Many interviewees referenced the use of the Community Plan as a communications and educational tool, and its potential to drive more collaboration and coordination across departments.

Pop-up Events

Career Fair at the Lummi Nation School

The project team partnered with the Lummi Nation School and attended the annual Career Fair on April 26, 2019 to gather input on the Community Plan. More than 40 people attended and close to 37 community members provided input by answering the question “what is your dream for our community?”

Dreams included:

- Housing: more housing and supportive services for elders, and smaller, affordable homes.
- Transportation: sidewalks around Lummi Reservation.
- Substance use disorder treatment and prevention: more services.
- Retail and amenities: a mall, supermarket, and grocery store.
- Entertainment venues: movie theater or event center.
- Youth programs and amenities: programs for youth, playgrounds for kids, and a swimming pool.
- Job training programs.

Youth at the Community Plan/US
Census booth at Paddle to Lummi.
Photo credit: Lummi Nation
Planning Department, 2019.



Paddle to Lummi 2019

The project team partnered with the US Census Bureau to share an engagement booth during the three days of the Tribal Canoe Journey: Paddle to Lummi event.

Informational Briefings

Throughout the planning process, informational briefings to share project progress and information were given.

Commission Meetings

Throughout the planning process, informational briefings to share project progress were conducted.



Photo credit: Ryan Dawson.

2 CULTURE

What We Mean By "Culture"

"Culture" as a concept includes many different aspects of life, some tangible (e.g., cultural resources such as sacred sites and archaeological resources), some intangible (e.g., shared values, beliefs, and cultural practices), and some a combination of both (e.g., cultural events such as the Canoe Journey and First Salmon Ceremony). Some aspects of culture are expressed communally, while others are expressed individually. Culture, therefore, encompasses a wide variety of communal and individual beliefs and behaviors, each shaping the other over time.

While the Lummi People (*Lhaq'temish*, meaning "People of the Sea" and "Survivors of the Flood") identify with the Coast Salish culture group, they have their own unique way of life. In the Lummi language (*Xwlemi' chosen*), this way of life is referred to as *Sche'lang'en*. The Lummi Nation Code of Laws [40.01.030(c)] includes explanations of Culture and Cultural Practice.

Our Culture is: "Our way of Life." Our beliefs, spirituality, language, how we are trained, what we eat, how we live, everyday activities, attitudes toward each other, our togetherness, our system of education, our values passed down in legends, storytelling, and our respect for the deceased, are in part, what we call our *"Sche'lang'en."*

Community picnic.



Cultural Practice is: An intangible aspect of our *Sche'lang'en* which is especially valued by our people. Although intangible by nature, cultural practices may be associated with, or dependent upon, cultural resources. They include language, oral traditions, ideology, family life, subsistence techniques, graphic arts, handicrafts, music, and dance, among others.

In order to promote cultural preservation and education, the Lummi Indian Business Council (LIBC) established the *Sche'lang'en* Department. Its five divisions (*Sche'lang'en*, Language, Tribal Historic Preservation Office, Repatriation Office, and Cultural Contract Services) work to fulfill their mission "to protect and maintain and preserve all significant cultural properties within our *Tengexw*, or the Traditional Territory and Waterways."

Protection, preservation, and promotion of both tangible and intangible aspects of culture, therefore, are included in the duties of LIBC's *Sche'lang'en* Department.

Purpose

This chapter addresses the cultural resources of the Lummi Nation community, both tangible and intangible. Culturally significant places, traditions, and beliefs are protected and preserved by the *Sche'lang'en* Department. This section explains trends in community perceptions of cultural goals and

achievements and identifies future challenges and opportunities for achieving the Lummi Community vision for Culture.

Issues & Trends

While Lummi Culture is an inextricable part of all the planning elements addressed in this document, this section examines culture in terms of demographics, resource management, sovereignty, education, and policies and regulations. These areas encompass the issues and trends most directly associated with Culture in the visioning and planning initiatives provided by the Lummi Nation.

Demographics & Culture

The current Reservation population of enrolled Lummi members is 2,920 and is expected to double over 20 years. This demographic shift will increase the demand for tribal services, including cultural resource management. With this expected growth, it will be important to balance the protection of cultural values with other community needs such as the development of more housing.

Honoring elders and youth is a particularly important Lummi cultural value. While exact age ranges for these groups can vary, approximately 14% of the current population is over the age of 65 and 24% is under the age of 18. The community works to support these members through teaching of an individual's value, role, and purpose within the community.

Considering the Lummi Nation's demographic characteristics and projected population growth, the Comprehensive Land Use Plan (2015) focuses on "plans for sustainable, low-impact development that optimizes the balance between resource protection/conservation and the highest and best uses of land for community wellness and prosperity."

Cultural Resource Management

The term "cultural resources" is typically used to distinguish between natural resources (e.g., water, air, animals) and resources that are a result of human activity (e.g., archaeological sites, traditional cultural properties, historic buildings). It is important to note, however, that practitioners are now

LANGUAGE EDUCATION

Indigenous tribes around the world are exploring ways to keep their language traditions alive. The Maori people of New Zealand established the Maori Language Commission to promote the use of Maori as a living language.

- A comprehensive online dictionary serves as a cultural resource, translating between English and Maori.
- Podcasts bring language learning in a new format. Taringa is a podcast led by young people that features discussions about Maori language and culture for a new generation.
- A revived effort to re-establish Maori names for significant places has the national government reconsidering official place-names across the country.

exploring the overlap between these two resource types since cultural values are often ascribed to natural resources, particularly in tribal contexts (e.g., salmon, orcas, eagles, cedar). "Cultural resource management" (CRM) refers to the professional practice of managing cultural resources according to the legal matrix of relevant rules and regulations at all levels of government (tribal, federal, state, local).

Title 40 of the Lummi Nation Code of Laws (discussed further in the Policies and Regulations section below) contains the Cultural Resources Preservation Code, elements of which are grounded in standard land use practices. The Findings and Purpose sections (40.01.020 and 40.01.030) state that the traditional lifestyle of the Lummi People that has existed since beyond the memory of man sustained the ancestors, as well as the tribe's language, resources, tradition, culture, and spiritual values. This lifestyle still exists in today's beliefs and practices. Other societies and governments, however, threaten those beliefs and practices. Unregulated impacts to cultural resources interfere with inherent rights and lead to the destruction of sacred lands, sites, and ancient village places associated with Lummi history. Regulation, therefore, is necessary for the protection of rights and benefit of the Lummi Nation and all its generations.

Title 40 is intended to guide the Sche'lang'en Department and the Cultural Resources Preservation Commission as they carry out their duties, including those related to the National Historic Preservation Act: "The purpose of this Code is to provide a framework to ensure that Lummi Nation cultural resources are preserved and protected through well-informed decisions that involve sound decision-making principles."



LINKS BETWEEN CULTURE & LAND USE PLANNING

Chapter 3.3 Zoning for Land Use

Preservation of cultural resources, wetlands, and endangered species habitat is a way to “promote economic development and individual development rights”.

Open Space: “The open space zone district provides land for preservation, conservation, and restoration of environmentally and culturally sensitive areas and for low impact, outdoor recreational uses”.

LU Strategy 3.3.2: Cultural resources are included in the list of resources that should be part of an “enhanced land inventory and capacity analysis” which would show where land is underused or more easily used due to fewer physical or regulatory factors.

Chapter 3.4 Alienation of Trust Lands

Reflects the impacts of Federal Indian policy on land ownership; for example, “Approximately 30% of the Reservation is now owned by non-Indians.” Discussions of “reverse alienation” and limitations to Indian Land Tenure, such as “fractioned interests” and “reverse fractioning” or “consolidation” further reflect historic trends in land ownership.

Chapter 3.6 Physical Constraints to Development

LU Strategy 3.6.1: Provide assistance to those navigating environmental protections, reducing burden for Tribal members

Chapter 4.3 Critical Areas

Protecting critical areas includes this service: “Protection of cultural properties, historic sites, and archaeologically and aesthetically valued resources.” Significantly, Washington State Growth Management Act does not recognize cultural resources, but Lummi Title 15 does.

Chapter 5 Housing

Both communal and individual values and aspirations are reflected in how the community views housing types. “If properly planned, innovative dwelling options will better suit the unique character of the community and encourage on-Reservation residency for all Tribal members, further amplifying the Nation’s holistic and sovereign growth.”

Sovereignty & Culture

Culture is intricately linked to community perceptions about sovereignty. The Lummi envision governing with consideration for the cultural needs of tribal members, including using properly trained and educated tribal members to promote Coast Salish and Lummi cultures. The Lummi Nation has dedicated resources to protecting and advancing the Lummi way of life through the Sche’lang’en Department.

Education & Culture

Culture is also linked to community perceptions about education. The Lummi Nation’s planning efforts in 2010 and 2014 found that members felt concerned about lack of respect for the Lummi culture, too much emphasis on living the dominant culture way, and youth not knowing their history. In response, the primary mission of the Sche’lang’en Department, established in Title 40, is to promote cultural preservation and education.

Policies & Regulations

The following are the key elements identified in previous plans and documents that provide insight into the community's perceptions about culture:

- Community-identified cultural resources: Language, religion, elders, youth, community, and cultural events.
- Community-identified rural and scenic locations that should be protected: Portage Island, beaches, Gooseberry point, off-Reservation burial grounds, Oyster Bay, Stommish Grounds.
- Off-Reservation burial sites and the establishment of cultural preserves.

In terms of current actions, the Lummi Nation Tribal Historic Preservation Office (LNTHPO), through participation in the Technical Review Committee process, conditions land use permits as necessary to meet resource protection requirements in a manner consistent with best cultural resource management practices in the Cultural Preservation Plan (CPP). In the event of an inadvertent discovery of cultural resources, the process is to stop work, secure the area, and contact the LNTHPO to determine appropriate action.

Challenges & Opportunities

This section identifies some of the needs, aspirations, and challenges facing the Lummi Community with respect to culture. Priority issues are briefly summarized in a way that mirrors the LIBC goal to "Preserve the Past, Promote the Present, and Protect the Future." Council priorities around Culture affirm this approach: never lose connection to *Sche'lang'en*, and work together as a people.

- **Cultural resources are threatened by impacts from development.** Over time, the pace of development, both on and off-Reservation, continues to accelerate; this, in turn, increases the number and intensity of threats to cultural resources, which themselves are finite and irreplaceable. The Lummi Nation can counteract these threats by actively engaging in cultural resource management and historic preservation.
- **Lummi sovereignty must be strengthened throughout the Reservation and Traditional Territory.** Strengthening Lummi sovereignty is a critical component of self-determination and self-governance, both of which are essential to cultural survival. An important example of how cultural resources, including archaeological sites, sacred sites, burial sites, and traditional cultural properties, are used as evidence in support of treaty



*Canoes at the Paddle to Lummi Event.
Photo credit: Ryan Dawson.*

rights both on and off-Reservation can be seen in the history of the Boldt Decision (United States v. Washington, 1974) which, affirming the Point Elliott Treaty, stated: "The right of taking fish, at all usual and accustomed grounds and stations, is further secured to said Indians, in common with all citizens of the territory." Each action the Lummi Nation takes to protect, preserve, and manage its own cultural resources represents a critical exercise of sovereignty.

- **Transmitting Lummi Culture from Elders to Youth is a critical component of cultural continuity and survival.** Language learning, passing down oral and written histories, and large gatherings are all methods of intergenerational cultural exchange. Community events, such as the Canoe Journey and the First Salmon Ceremony, essentially serve as "experiential education." The Lummi community's administration, governmental departments and programs, educational institutions, and community events all have the potential to include an educational component, either directly or indirectly.

Our Plan

Our vision for Culture is to:

Preserve and manage cultural resources in ways that contribute to meeting the social, environmental, spiritual, economic and other needs of present and future generations.

To achieve this vision, our Community Plan has policy, programmatic, regulatory, and incentive-based components that:

- Provide leadership and technical assistance in the preservation, protection, and conservation of cultural resources by developing a culturally appropriate cultural resources management program, by sponsoring educational programs for the general public and training programs for tribal members and employees, and by consulting and cooperating with other governmental agencies.
- Administer cultural resources within the jurisdiction or control of the Lummi Nation and on lands within the traditional territory of the Nation in a spirit of stewardship and for the inspiration of present and future generations.

Our goals and policies provide our aims, guidelines, and strategies to implement this plan.



2010 Stomish Water Festival.

Goals & Policies

Goal C-1: The Lummi Nation protects all cultural resources from impacts of development.

Policy C-1.1: Apply Lummi cultural values to development regulations and practices.

*Policy Connections:
Land Use*



Policy C-1.2: Involve the Tribal Historic Preservation Office land use regulation process when cultural resource impacts are involved.

Policy C-1.3: Incorporate Lummi values into the architecture and design of housing types on the Reservation.

Policy C-1.4: Encourage sustainable, low-impact development that optimizes the balance between protecting or conserving resources and the highest and best uses of land for community wellness.

Policy C-1.5: Identify rural and scenic locations that should be specifically protected.

Policy C-1.6: Recognize the opinion of Lummi members as a valuable indicator for gauging the success of cultural resource preservation.

Goal C-2: Lummi Nation sovereignty is strengthened throughout the Reservation and Traditional Territory.

Policy C-2.1: Defend rights, as established in the Point Elliott Treaty of 1855.

Policy C-2.2: Establish cultural preserves for use by the Lummi People.

Policy C-2.3: Protect off-Reservation burial sites.

Goal C-3: The Lummi Nation educates the community about the Lummi way of life, or Sche'lang'en.

Policy C-3.1: Promote community events that serve as experiential cultural education.

Policy C-3.2: Involve Lummi youth in Coast Salish cultural classes.

Policy C-3.3: Expand resources in the Xwlemi Chosen language and oral history.

Action Plan

Exhibit 2-1 identifies implementation initiatives or strategies related to culture the Tribe is prioritizing to accomplish prior to the next Community Plan Update.

Exhibit 2-1. Culture Action Plan

Implementation Action	Responsibility
Goal C-1: Protect cultural resources.	
Participate in land use permitting and environmental review processes when cultural resource impacts are possible	Sche'lang'en, Planning
*Continue to grow the Portage Bay Partnership, protecting natural resources along the coast. Set benchmarks for water quality improvement.	Natural Resources
*Expand Stommish Grounds.	Planning, Natural Resources
*Review planning and permitting processes to ensure the protection of cultural resources.	Planning, Sche'lang'en
*Ensure real estate acquisition projects are informed by a resource protection strategy.	Planning, Sche'lang'en, LIBC
*Develop a set of architectural and development design guidelines that align with Lummi values.	Sche'lang'en, Public Works
Define the most urgent threats to intangible resources. Develop a protection plan.	Sche'lang'en
*Complete an enhanced land inventory and capacity analysis. Identify areas that are better suited for development or for preservation.	Planning, Sche'lang'en
Inventory cultural resources, including off-Reservation burial sites. Develop a prioritization list of protections needed and an implementation strategy.	Sche'lang'en
*Develop a strategy to implement high-priority burial protections.	Sche'lang'en, Sovereignty & Treaty Protection
Create a community survey, distributed at regular annual or semi-annual intervals, to gauge public perception of progress toward cultural resource management.	Sche'lang'en
Goal C-2: Strengthen Lummi Sovereignty.	
Work with the Lummi Planning Department in support of land acquisition efforts.	Sche'lang'en, Planning
Engage proactively in off-Reservation cultural resource management.	Sche'lang'en, Sovereignty & Treaty Protection
*Participate in the federal Section 106 review process.	Sche'lang'en, Sovereignty & Treaty Protection

*Policy Connections:
Economic Development*

*Policy Connections:
Land Use*

*Policy Connections:
Land Use*

Implementation Action	Responsibility
Goal C-3: Promote cultural education.	
Identify and train teachers for Coast Salish culture classes.	Sche'lang'en
*Develop a curriculum for culture classes and a standard for participating students.	Sche'lang'en, Youth Social Services
*Invest in early childhood Lummi language programs to strengthen self-esteem, identity, and community connectedness.	Sche'lang'en, Education
Continue to grow successful cultural events, such as Paddle to Lummi and the First Salmon Ceremony.	Sche'lang'en
*Continue to incorporate the Xwlemi Chosen language and Lummi values into the curriculum at Lummi Nation School and NWIC.	Education, Sche'lang'en
*Offer Xwlemi Chosen classes in a range of fluency levels and approaches (written, spoken, oral, and physical).	Education, Sche'lang'en
*Identify opportunities to learn language skills in the context of practical activities, cultural activities, and family relationships.	Education, Sche'lang'en
Create and fund an ongoing oral history program that allows community members to record and secure their stories for the benefit of future generations.	Sche'lang'en
*Establish a venue for cultural performances by local musicians, theater, and other artists within the community.	Sche'lang'en, Planning

Policy Connections:
Youth & Education



Policy Connections:
Parks & Public Spaces





3 NATURAL ENVIRONMENT & SUSTAINABILITY

Purpose

The purpose of this chapter is to address the health of the natural environment and the sustainability of the Lummi Nation community on the Lummi Reservation.

This chapter includes:

- A review of the importance of natural resources to the Lummi people
- A summary of the regulations found in the Lummi Code of Laws that pertain to environmental natural resources
- Sustainability goals and initiatives

Issues & Trends

More than anything else, the Lummi people value the quality of the natural environment on and around the Lummi Reservation and throughout the watersheds of the Salish Sea and the Nooksack River. Lummi teachings say that the plants and animals are relatives of the people. The habitats of

a healthy natural environment support the salmon relations and shellfish relations who provide sustenance and economic support for tribal members, as well as the tree and plant relations who provide traditional materials for healing, clothing, and transportation. Within the government of the Lummi Nation the protection and restoration of natural resources is under the purview of the Lummi Natural Resources Department whose mission is to "enhance, manage, and protect the natural resources into perpetuity for the benefit of the Lummi people in accordance with the policies and procedures of the Lummi Nation."

The work of the Lummi Natural Resources Department is to protect the natural resources on the Reservation by undertaking legal action and other advocacy to protect habitat, constructing projects throughout the watershed to restore habitat, and implementing laws and regulations on the Reservation.

The Lummi Nation's laws require restoring, protecting, and sustaining the natural resources and habitat of the Lummi Reservation (e.g., wetlands, streams, and marine shorelines) for the current and future generations of the Lummi people. These laws promote the stewardship and support of a healthy relationship between the Lummi Nation and their natural resources — as relatives rather than managers or owners.

In response to the threat of climate change to the natural environment and resources that are central to the tribal economy, culture, and traditions, the Tribe developed the Lummi Nation Climate Change Mitigation and Adaptation Plan: 2016-2026. The Plan evaluates the potential impacts of anthropogenic climate change on the Reservation as well as Lummi usual and accustomed grounds and stations and traditional territories. It presents strategies to reduce greenhouse gas emissions and to anticipate and adapt to the impacts of climate change.

Aligned with the Tribe's climate sustainability efforts, the Lummi Nation Strategic Energy Plan: 2016-2026 evaluates current and future energy needs and resources on the Reservation and identifies options for improving energy efficiency and developing renewable energy resources. Successful implementation of the Plan will help the Lummi Nation achieve two goals: improving economic and energy self-sufficiency; and reducing emissions from energy production and use that contribute to climate change, air quality degradation, and other adverse environmental and human health impacts.

The Residential Energy Efficiency Pilot Program is an example of the Lummi Nation's strategies for improving energy efficiency. This program performed energy audits as well as retrofitting and weatherization for eight homes located on the Reservation and owned by tribal members.

Conditions & Trends

Cultural & Regulatory Contexts

Streams and wetlands provide a number of benefits to the Lummi Nation, including habitat for fish, migratory birds, amphibians such as frogs and salamanders, and other wildlife. Streams and wetlands also provide habitat for culturally important plants and the setting for tribal members to engage in cultural practices.¹ To reach the best decisions about management and development on the Lummi Reservation, their effect on environmental resources must be considered along with regulatory contexts such as the Lummi Nation Code of Laws as well as cultural values that recognize plants and animals as relations that share the Reservation with the people.

The Lummi people have sustained themselves in harmony with nature living off the bounty of the land since time immemorial. Living in balance with ecological processes while supporting a thriving community over thousands of years is the ultimate expression of what is now called "sustainability". Today the Tribe continues to support this balance through its legal and economic activities and through its operations.

Inventory of Environmental Assets

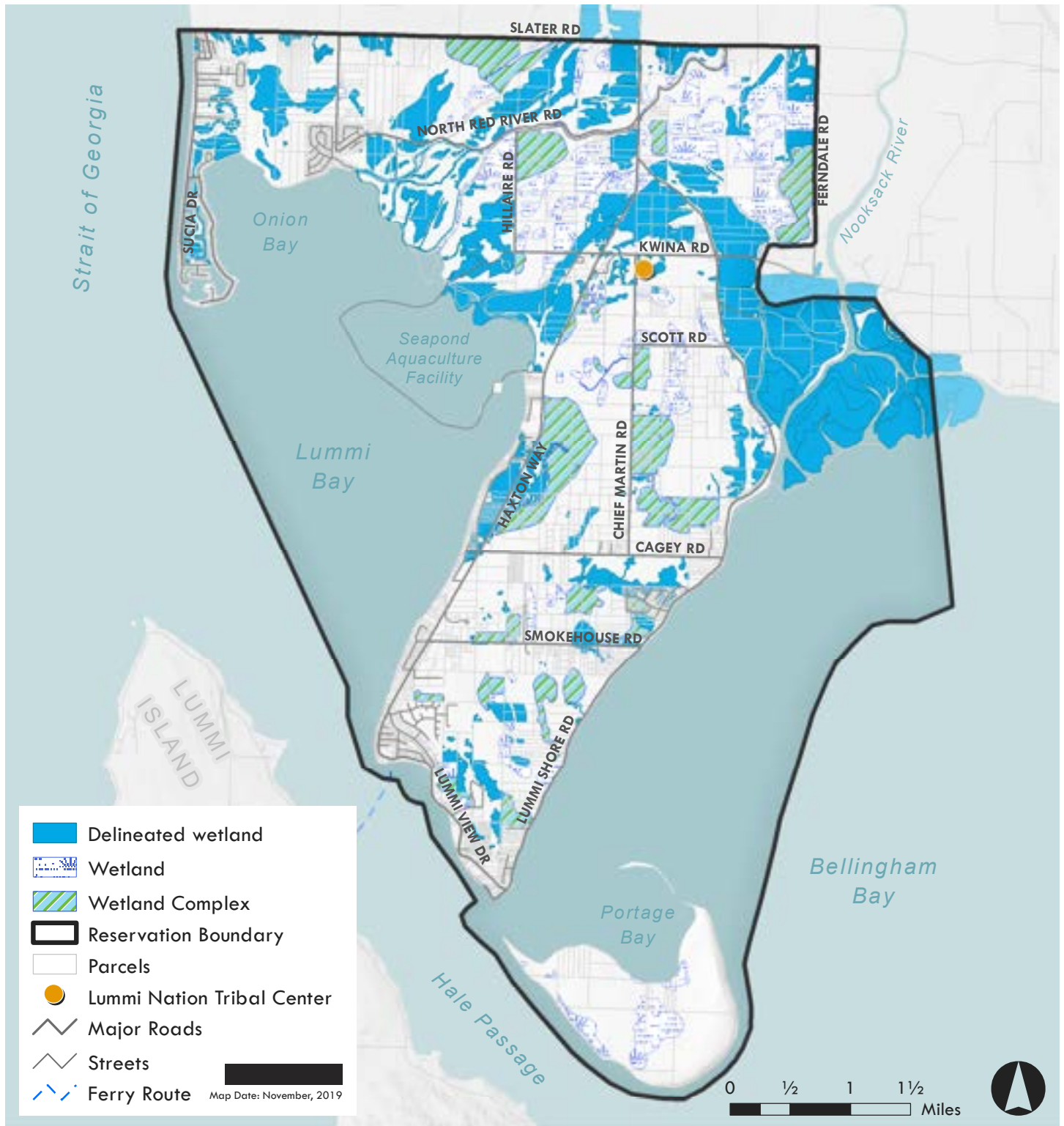
Water Resources

The streams, wetlands, and marine waters of the Lummi reservation are more than just resources, they are relatives of the Lummi People and support the cultural and economic wellbeing of the Lummi Nation. **Exhibit 3-1** and **Exhibit 3-2** map the locations of the environmentally critical areas discussed in this section.

The Nooksack and Lummi Rivers face threats from climate change, as reported in the Lummi Nation Climate Change Mitigation and Adaptation

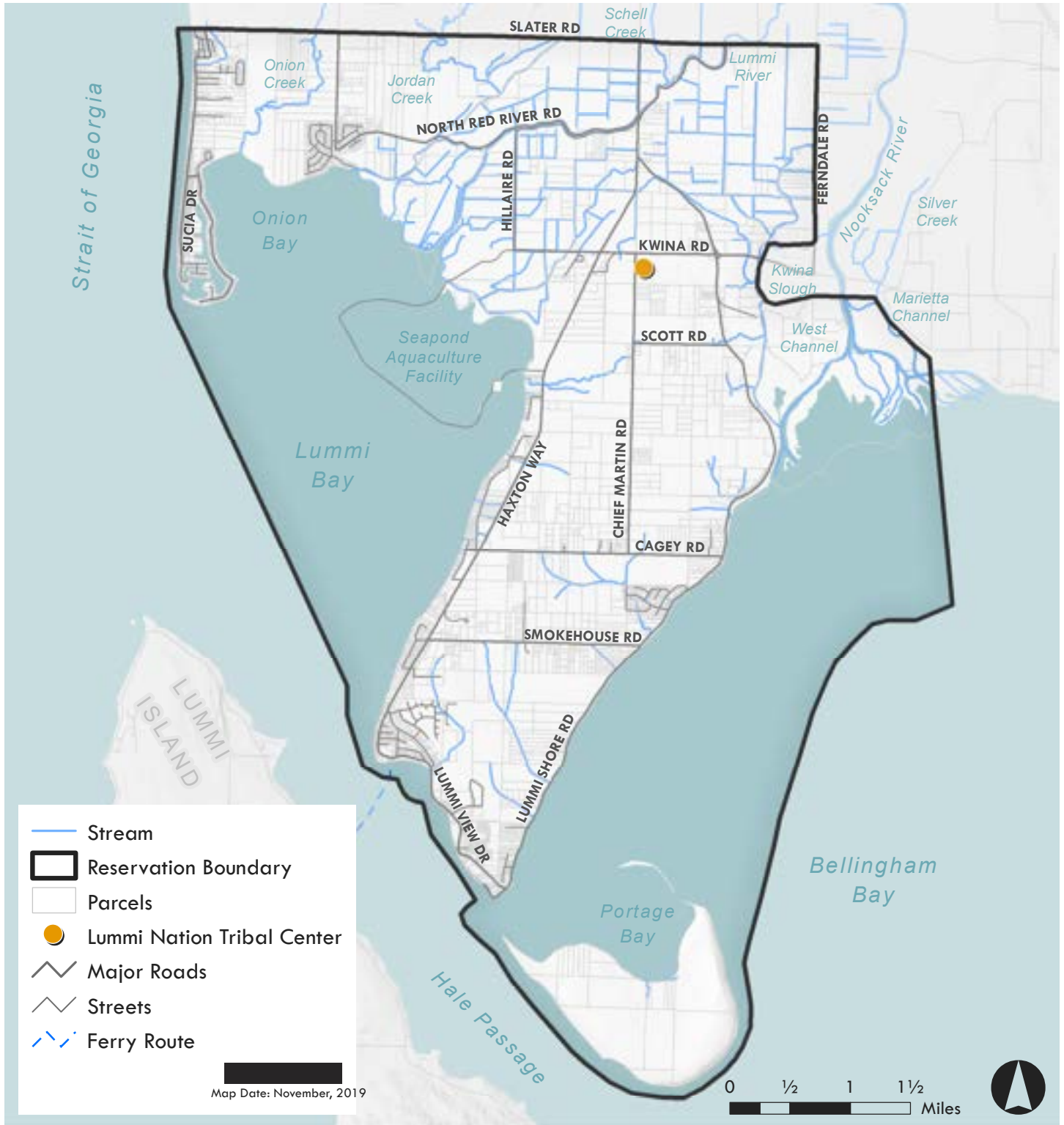
¹ *Lummi Nation Atlas, 2016.*

Exhibit 3-1. Lummi Reservation Wetland Areas



Sources: Lummi Nation, 2019; Herrera Environmental, 2019; BERK, 2019.

Exhibit 3-2. Lummi Reservation Streams



Sources: Lummi Nation, 2019; Herrera Environmental, 2019; BERK, 2019.

Plan published in 2016. The Nooksack River originates in the Cascade Mountains, crosses under I-5, and runs through Ferndale before emptying into Bellingham Bay at the delta on the eastern edge of the Reservation. The Lummi River breaks off from the Nooksack north of the Reservation and traces across Lummi land to the Lummi Bay. Forecasting estimates suggest that by 2050 the existing 10-year flood interval will be reduced to 3 years. More frequent flooding poses significant risk in winter months to areas adjacent to the river on both sides of the Reservation border. Summer months are expected to experience a decrease in precipitation, causing a reduction of instream flow. This has negative impacts for surface water availability during the driest months. Elevated water temperatures pose lethal threats to the marine habitat.

Groundwater resources are incredibly important for sustaining critical habitat and for supporting development capacity, as new households create increasing demand for water service. Over 95% of residential water supply comes from the two potable water systems that operate on the Reservation, one to the northeast and one in the southern upland area of the peninsula. The Lummi River floodplain separates the two systems. Groundwater sources are vulnerable to climate change impacts, contamination from pollutants introduced on or near the surface by human activity, and by changes to the land cover in areas where water permeates into underground aquifers. Further growth and development on the Lummi Reservation depends on this water supply but could impact its quantity and quality without proper supervision and regulation.

According to a 1999 inventory, approximately 43% of Reservation land is considered wetlands. Sixty percent of the wetlands are in the Nooksack and Lummi River floodplains. These areas provide vital ecological habitat and water quality enhancement. The interconnected communities of flora and fauna that rely on this unique habitat are severely threatened by climate change scenarios and changes in upstream land use due to development pressure. Mitigation efforts have already begun to protect and restore these essential resources, but further monitoring is necessary to predict and proactively avoid further degradation.

Shorelines

Along the Lummi Reservation's approximately 38 miles of shoreline, property is threatened with erosion and flooding from sea level rise. Difficult land use decisions will be forced upon developments in these areas under many climate

change scenarios. Strategies such as managed retreat and fortification come with many community impacts which need to be carefully considered.

Tidelands

The Lummi Nation owns 10,500 acres of tidelands, much of which is suitable for productive shellfish beds (Climate Action and Mitigation Plan, 2015). All

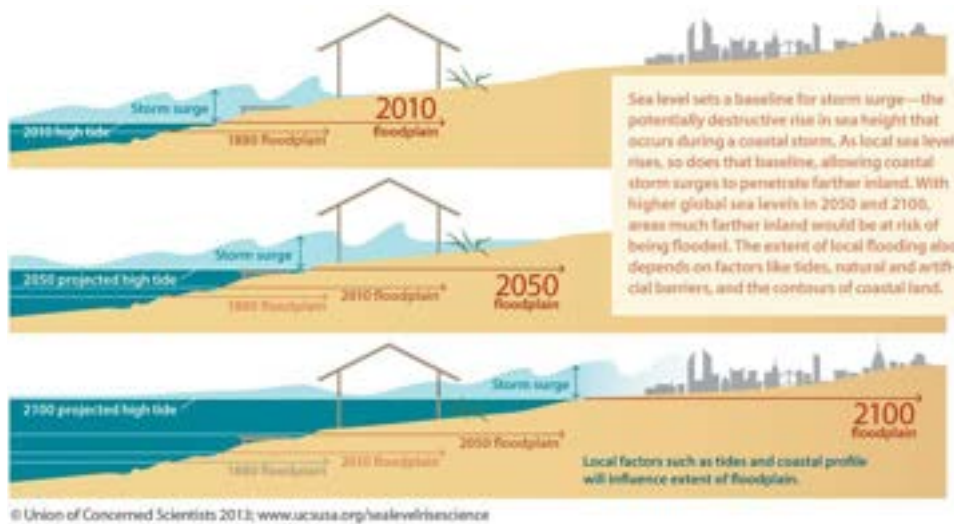


Exhibit 3-3. Inundation and Flood Risk from Sea Level Rise, Storm Surge, and High Tide

Source: Lummi Climate Change Mitigation and Adaptation Plan, 2016-2026 (from the Union of Concerned Scientists, 2013).

these tidelands are held in trust by the United States for the exclusive use of the Lummi Nation.

Forests

Forest covers almost 50% of Reservation land, tidelands excluded on the mainland and on Portage Island. The Lummi Nation also owns two off-Reservation forest sites: the Arlecho Creek watershed and 26 acres at Madrona Point on Orcas Island. There are many environmental benefits provided by forests, such as wildlife habitat, soil stabilization, and air purification. Much of this land is currently zoned as agricultural.

Marine & Upland Wildlife

The Nooksack River is home to all five species of Pacific salmon. The salmon population has dramatically decreased over the decades, largely due to off-Reservation contamination of river water and overharvesting. The Lummi

Lummi Bay
Salmon Hatchery.



Salmon Enhancement Program operates two salmon hatcheries. The first is the Skookum Creek Fish Hatchery located on the South Fork Nooksack River near Acme, and the second is the Lummi Bay Hatchery located on the Lummi Reservation. Their main purpose is to establish and maintain stocks of salmon and enhance salmon populations within the Nooksack River basin and surrounding areas.

Shellfish are essential to the Lummi Sche'lang'en, and harvested for commercial, ceremonial, and subsistence purposes. Important species include the Dungeness crab, spot shrimp, manila clam, butter clam, and Pacific oyster. To support a healthy population of shellfish, the Lummi Nation operates a Shellfish Hatchery located on Lummi Bay.

Wildlife in the usual and accustomed areas are hunted both for food and for ceremonial purposes. Deer, elk, mountain goats, bear, bobcats, cougar, and coyote can all be found in these areas.

The Cultural Importance & Traditional Uses

In the Introduction to Lummi Atlas, Tribal Chairman Timothy Ballew described the *Lhaq'temish* (the Lummi People) as fishers, hunters, gatherers, and harvesters of nature's abundance since time immemorial. He said, "the Lummi



*Skookum Creek
Salmon Hatchery.*



*Lummi Bay
Shellfish Hatchery.*

are a fishing nation and for thousands of years we have worked, flourished and celebrated life on the shores and waters of the Salish Sea.”

The Lummi people have sustained a reciprocal relationship with the land that continues to feed, clothe, and heal them today. Ceremonial practices involve a multitude of natural resources, primarily the land and significant places. The people of the Lummi Nation are strongly attached to the sense of place in the Reservation, demonstrated in agreements the ancestors of the Lummi people fought for in the Point Elliott Treaty. The Lummi Nation’s sacred plant relatives that grow on the land of the Reservation are essential to performing traditional ceremonies.

Lummi Nation Code of Laws & Whatcom County Code

Environmental and natural resources of the tribal lands of the Lummi Reservation are regulated under Chapter 17 of the Lummi Nation Code of Laws (Water Resources Protection Code). Under this chapter there are specific subchapters for wetlands and streams (Lummi Code of Laws 17.06) requiring both buffers to protect these resources and mitigation for any impacts. The Whatcom County Critical Areas Ordinance (Whatcom County Code Chapter 16.16) applies to geologically hazardous areas, frequently flooded areas, critical aquifer recharge areas, wetlands, and fish and wildlife habitat conservation areas on non-tribal lands. Given land ownership patterns, the ordinance applies to fee simple parcels on the reservation. The Lummi Code of Laws applies to tribally-owned land and land held in trust.

Exhibit 3-4, **Exhibit 3-5**, and **Exhibit 3-6** describe categories of wetlands and streams as defined by Lummi Code of Laws (17.06.070 and 17.06.80) and LIBC Resolution #2016-014, as well as required buffers. Chapter 17.06.110 and 17.06.120 establish the process for mitigation of impacts to wetlands and streams.

Challenges & Opportunities

- **Traditional ecological knowledge and practices are important to carry forward.** The Lummi Nation’s relationship with natural resources is unique and strongly connected to identity, culture, belief systems, and practices. The Nation’s relationship with the natural environment serves as a model of stewardship to sustain water and other resources for generations based on ecosystems, watersheds, and foodsheds rather than the more typical, siloed approaches. Restored areas of on-Reservation natural resource preserves are opportunities for teaching about traditional uses for local plants.

Exhibit 3-4. Wetland Classification and Buffers

Classification	Buffer	Description
Category 1 Critical Value Wetlands	100 ft.	Wetlands identified by the Lummi Nation as irreplaceable and having a high level of importance for fisheries, Lummi culture, and/or water quality on the Reservation or trust lands.
Category 2 High Value Wetlands	75 ft.	Wetlands that perform important ecological or hydrological functions.
Category 3 Moderate Value Wetlands	50 ft.	Wetlands that do not satisfy Category 1 or Category 2 criteria; or Category 2 non-riparian wetlands that are less than 0.1 acre (4,356 sq. ft.), are not part of a wetland complex, and are not contiguous with a stream, an estuary, or a designated open space.
Category 4 Low Value Wetlands	25 ft.	Wetlands that do not satisfy Category 1, Category 2, or Category 3 criteria, are of minimum habitat value, and are suitable for restoration or enhancement efforts.

Source: Lummi Nation Code of Laws

Exhibit 3-5. Stream Categories

Classification	Description
Category 1	All streams that flow year-round during years of normal rainfall or are used by juvenile or adult salmonids.
Category 2	All streams that are intermittent or ephemeral during years of normal rainfall and are not used by juvenile or adult salmonids.

Source: Lummi Nation Code of Laws

Exhibit 3-6. Stream Buffer Distances

Classification	Buffer Distance and Description
Category 1	All streams shall have a minimum of a one hundred (100) foot buffer of natural vegetation on both sides of the channel. The buffer width shall be a horizontal distance measured from the ordinary high-water mark of the stream channel. No septic systems shall be placed within two hundred (200) feet of a Category 1 stream.
Category 2	All streams shall have a minimum of a twenty-five (25) foot buffer of natural vegetation on both sides of the channel. The buffer width shall be a horizontal distance measured from the ordinary high-water mark of the stream channel. No septic systems shall be placed within one hundred (100) feet of a Category 2 stream.

Source: Lummi Nation Code of Laws

GARDENING AS A SOLUTION

The Project Grow service of Partnership With Native Americans and its Northern Plains Reservation Aid program supports individuals and reservation programs taking the lead on healthy diets and nutrition education in their tribal communities. In the past five years, Project Grow has supported gardening through tilling of more than 500 individual gardens on three reservations. An 800-square foot garden can feed a family of four, creating a direct access to healthier, whole foods.

- **Development pressures threaten encroachment on natural resource lands.** Studies show that concentrating development and residents in compact nodes has many ecological benefits. Residents of compact, walkable nodes of development individually consume less oil, electricity, and water, and are less reliant on cars for daily transportation. Given that a large part of the Lummi Reservation is forested, and includes wetlands, concentrating development in areas where there is existing development can conserve natural areas. This approach to development would encourage a mix of building types and uses, diverse housing and transportation options, and community collaboration in development decisions.
- **Climate Change will impact Lummi land.** According to the 2016 Lummi Nation Climate Change Mitigation and Adaptation Plan, anticipated impacts of climate change on the Reservation are significant and diverse. Building a climate resilient community in the face of these impacts will require coordinated and comprehensive climate preparedness planning.
- **Groundwater levels and Water Quality are affected by changes in land use and polluted stormwater run-off.** Groundwater is one of the most important resources of the Lummi Nation. As noted earlier, close to 95% of the residential water supply for the Reservation is pumped from local groundwater wells.² Future development on the Reservation will need to consider the challenges of groundwater quality and availability. Water quality in the marine waters adjacent to the reservation relies on the ecological integrity of the Lummi tidelands. Ceremonial, subsistence, and commercial shellfish harvest are integral to Sche'lang'en, the Lummi way of life. Given this, it is important to take steps to ensure water quality throughout the Nooksack watershed and protect tideland resources.
- **Inter-governmental cooperation is key for managing regional and shared resources.** Ongoing dialogue and cooperation to stay informed about current issues, build trust, mediate jurisdictional disputes and to develop effective intergovernmental policy to jointly manage natural resources effectively across the landscape.

Our Plan

Our vision for the Natural Environment and Sustainability is to:

² Lummi Nation Climate Change Mitigation and Action Plan 2016–2026.

Manage natural resources sustainably to meet our Lummi peoples' cultural, housing, economic, health, and recreational needs, and preserve and enhance these resources for future generations.

To achieve this vision, our Natural Environment and Sustainability Plan has policy, programmatic, regulatory, and incentive-based components:

- Maintain an inventory of important natural features and assets.
- Protect and enhance critical areas through regulations on Reservation lands and coordinate with Whatcom County on the management of critical areas on non-tribal fee simple lands.
- Use the best available science to plan and design water quality practices and groundwater recharge practices.
- Promote the development of compact, walkable, mixed-use neighborhoods on Reservation lands consistent with the Community Design Framework (see **Chapter 5**).
- Implement climate adaptation and mitigation strategies on the Reservation through land use and infrastructure investment plans.
- Advance self-sufficiency, entrepreneurship, and healthy living by setting aside lands for local food production that integrates conservation practices.
- Take a leadership role in interagency watershed protection and enhancement efforts to protect usual and accustomed grounds and stations.
- Ensure the Natural Resources Department has enough funding and capacity to steward this plan.

Our goals and policies provide our aims, guidelines, and strategies to implement this plan.

Goals & Policies

Goal N-1: The Lummi Nation integrates strategies across natural, social, and built systems to ensure sustainability and wellbeing.

Policy N-1.1: Concentrate development in compact, walkable nodes to conserve forestland and avoid impacting environmentally sensitive habitats and their buffers throughout the Lummi Nation Reservation.

*Policy Connections:
Land Use; Community Design
Framework*



Policy Connections:
Culture



Policy N-1.2: Continue to advocate for conservation to help protect the treaty-reserved rights of the Lummi Nation, which include the right to hunt and gather throughout the tribe's usual and accustomed grounds and stations and in traditional territories.

Policy N-1.3: Support educational opportunities and promote appreciation of the natural environment while protecting wetlands, streams, steep slopes, and cultural resources.

Policy N-1.4: Provide coordinated cultural and environmental review of projects on the Reservation by tribal members that is efficient, transparent, and balances the sovereignty of the Lummi Nation and is protective of resources.

Policy N-1.5: Develop a robust and holistic sustainability policy for the Lummi Nation that reflects the Tribe's values for energy efficiency, water use, and materials management.

Goal N-2: The Lummi Nation restores salmon habitat functions and processes by implementing culturally appropriate protection regulations and restoration strategies in the Nooksack basin.

Policy N-2.1: Continue efforts to resolve conflicts over water rights allocations in the Nooksack River basin.

Policy N-2.2: Continue to implement riparian and floodplain restoration strategies to address limiting habitat functions.

Policy N-2.3: Protect river banks against erosion with vegetation and green engineering techniques rather than hard structural shoreline armoring.

Policy N-2.4: Continue to protect environmentally sensitive areas on the Reservation, in concert with Whatcom County, with a robust set of regulations including culturally appropriate and effective mitigation that is consistent across the Reservation both on on trust lands and parcels owned by non-Indians.

Goal N-3: The Lummi Nation protects, maintains, and enhances environmentally sensitive habitats.

Policy N-3.1: Preserve and restore a diverse mosaic of estuarine, depressional, and riparian wetland habitat types, including eelgrass meadows, tidelands, salt marshes, scrub-shrub wetlands, and forested wetlands.



*Great Blue
Heron rookery.*

Policy N-3.2: Preserve and restore marine shorelines and marine waters used for shellfish production, forage fish, out migrating juvenile salmon, and other species.

Policy N-3.3: Preserve and restore freshwater streams by implementing water quality measures to treat polluted stormwater runoff. Restore and enhance habitats in streams.

Goal N-4: The Lummi Nation works proactively to support salmon, shellfish, and upland plants and wildlife of traditional and cultural importance to the Lummi Nation on the Reservation.

Policy N-4.1: Continue efforts to support the recovery of salmon through the hatchery program, habitat enhancement, and advocacy.

Policy N-4.2: Continue to protect tidelands habitat and water quality to provide a harvestable surplus of shellfish for the Lummi People.

Policy N-4.3: Continue to protect upland plants and wildlife of traditional and cultural importance to the Lummi Nation.

Manila clams marked for a growth and survival experiment.



Goal N-5: The Lummi Nation defines a clear path to plan and adapt for climate change.

Policy N-5.1: Establish and maintain a Climate Preparedness Planning Committee with representatives from the Lummi Indian Business Council, the Police, Planning and Public Works, Natural Resources and Cultural Resources departments, the Lummi Tribal Health Center, the Lummi Tribal Sewer and Water District, the Lummi Commercial Company, the Lummi Housing Authority, and the Northwest Indian College to provide guidance and oversight in climate mitigation and adaptation planning.

Policy N-5.2: Implement the mitigation and adaptation strategies based on guidance of the Climate Preparedness Planning Community, community feedback, the recommendations of the Climate Change Mitigation and Adaptation Plan, and other vulnerability assessments.

Policy N-5.3: Ensure development regulations respond to climate risks including sea level rise, flooding, and increasing strain on stormwater management systems.

Policy N-5.4: Amend the Lummi Code of Laws to require consideration of sea level rise and increasing storm intensities in development regulations.

Policy N-5.5: Plan and design habitat restoration projects based on the best available climate science.



*Mitigation bank
on the shore.*

Oyster shell washing machine for setting cultch.



Planting Douglas Fir seedlings.





*Coastal flooding at
Gooseberry Point.*

Goal N-6: The Lummi Nation protects people and reduces property damage during flood events.

Policy N-6.1: Implement the Lummi Nation Multi-Hazard Mitigation Plan flood mitigation priorities.

Policy N-6.2: Reduce the risk of flood damage to private property and public infrastructure by mapping areas susceptible to flooding.

Policy N-6.3: Modify building and land use codes to require consideration of flooding risks and mitigation measures.

Policy N-6.4: Develop a plan to ensure public infrastructure and tribally owned assets are protected from increased flood risks.

Action Plan

Exhibit 3-7 identifies implementation initiatives or strategies related to culture the Tribe is prioritizing to accomplish prior to the next Community Plan Update.

Exhibit 3-7. Natural Environment & Sustainability Action Plan

Implementation Action	Responsibility
Goal N-2: Salmon Habitat Restoration in the Nooksack Basin.	
Continue to implement prioritized salmon habitat restoration projects in partnership with other agencies and entities in the Nooksack basin.	Natural Resources
Continue to advocate for and implement projects to improve water quality and instream flows in the Nooksack basin.	Natural Resources, Water Resources
Continue to implement prioritized projects to minimize erosion and support the ecological function of the marine nearshore of the Salish Sea.	Planning, Water Resources Natural Resources
Goal N-4: Protect natural habitats of traditional and cultural importance on the reservation.	
Prevent and reverse habitat destruction, replace undersized culverts and other barriers to migration, prevent pollution, and restore instream flows.	Natural Resources
Increase enforcement and other actions to achieve and sustain federal, state, and Lummi Nation water quality standards.	Natural Resources, Office of Intergovernmental Affairs
Ensure continued water quality monitoring through programs such as the Pacific Shellfish Institute's water chemistry monitoring program at the Lummi Bay Shellfish Hatchery, and the Lummi Water Resources Division's ambient water quality monitoring program that samples fresh and marine waters on the Reservation.	Water Resources, Natural Resources
Support the Lummi Bay Shellfish Hatchery's restocking of tribal tidelands with manila clam seed and oyster spat. Support the hatchery's production and sale of geoduck seed to offset operating costs.	Water Resources, Natural Resources
Goal N-6: Protect people and reduce property damage during flood events.	
Strengthen regulatory flood risk reduction measures.	Natural Resources, Planning
Upgrade infrastructure to accommodate or protect against flooding in anticipation of climate change.	Natural Resources, Public Works
Continue to pursue land acquisition, building relocation or demolition, and open space preservation in special flood hazard areas.	Natural Resources, Planning
Coordinate land acquisition, zoning changes, development restrictions, and/or other regulatory tools as appropriate to reduce property damage from flooding.	Natural Resources, Planning
Revise the Building Code (LCL Chapter 22) for consistency with the more widely used International Building Code (IBC).	Natural Resources, Planning



4 ECONOMIC DEVELOPMENT

Purpose

This element addresses the economic development strategy of the Lummi Nation. It evaluates the current economic health of Lummi people and plans for workforce development, business recruitment and incubation, and economic policy that fosters prosperity and sustainability.

Issues & Trends

Conditions & Trends

Most of the Lummi labor force is employed on the Reservation or in Lummi enterprises. The Lummi Nation has historic connections to the marine industry and environmental stewardship. Traditional fishing and artisan practices are important cultural and economic activities that contribute to tribal identity. Today's economy on the Reservation also features newer economic drivers such as the Silver Reef Casino Resort, the Northwest Indian College, and the recently acquired Loomis Trail Golf Course. In addition to providing tax revenue and attracting visitors, these organizations also offer career-building opportunities for Lummi people.



NORTHWEST
INDIAN COLLEGE
Xwlemi Elh>Tal>Nexw Squl

Situated on the Lummi Indian Reservation, Northwest Indian College (NWIC) is the only accredited tribal college in the states of Washington, Oregon, and Idaho. NWIC traces its roots to the Lummi Indian School of Aquaculture, a single-purpose institution founded in 1973 to develop a skilled technical workforce for Indian-owned and operated fish and shellfish hatcheries throughout the United States and Canada.

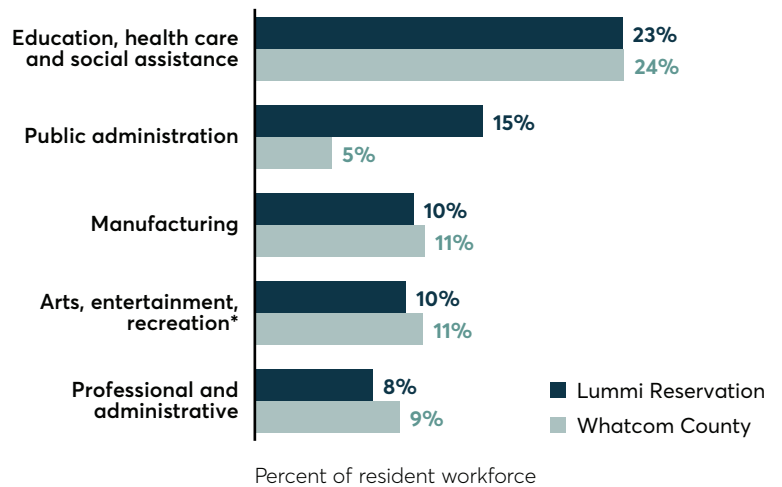
–Lummi Nation CDFI

Employment & Income

The top industry sectors of employment for Lummi Reservation residents are Education/Healthcare/Social Services, Public Administration, and Manufacturing (see **Exhibit 4-1**).¹ This reflects the fact that a large proportion of Lummi Indian Business Council and Northwest Indian College employees are tribal members. Employment in the natural resources sector has declined, and only 3.5% of Lummi Reservation residents are employed in agriculture, forestry, and fishing occupations.

Exhibit 4-1. Top 5 Industries of Employment for Lummi Reservation Residents, 2017

**Includes accommodation and food service.*
 Sources: American Community Survey DP03 5-Year Estimates, 2013-2017; BERK, 2019.



The Lummi Nation is the second largest employer in Whatcom County. Other large employers in the region include St. Joseph Hospital in Bellingham, government agencies and institutions, Western Washington University, and the BP-owned Cherry Point oil refinery in Birch Bay. See **Exhibit 4-2**.

Many Lummi members are entrepreneurs and run their own businesses. Within the Lummi community, there are 98 registered small and medium sized businesses (see **Exhibit 4-3**). These businesses range from long established fish buying and processing enterprises, trades, Native arts, and food catering. Small- and medium-sized businesses can play an important role in defining community identity, and policies that strengthen entrepreneurship on the Reservation will contribute to this asset-building process.

¹ American Community Survey DP03 5-Year Estimates, 2013–2017.

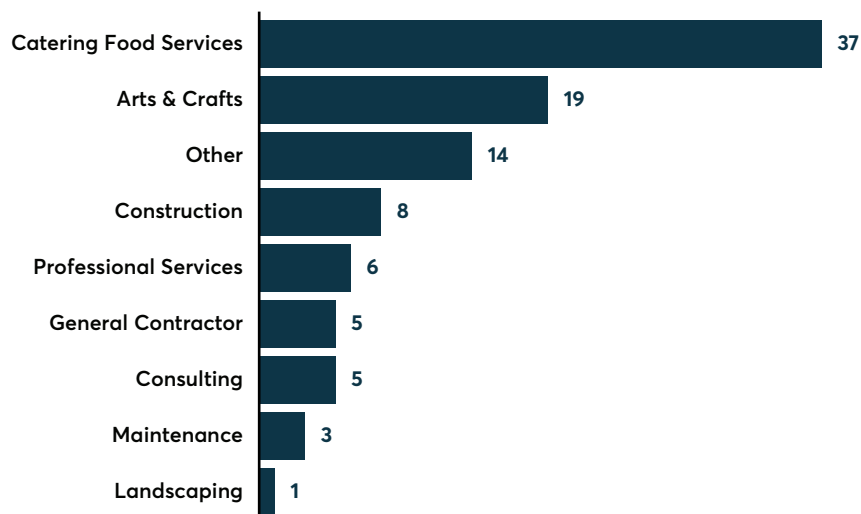
Exhibit 4-2. Top Employers in Whatcom County

Rank	Employer	Employees
1	St Joseph Hospital	2,126
2	Lummi Nation	1,780
3	Bellingham Public Schools	987
4	Whatcom County	881
5	Western Washington University	839
6	BP Cherry Point Refinery	820
7	The City of Bellingham	788
8	Fred Meyer	778
9	Haggen	751
10	Zodiac Interiors	607

Sources: *Center of Economic and Business Research at Western Washington University, 2016; BERK, 2019.*

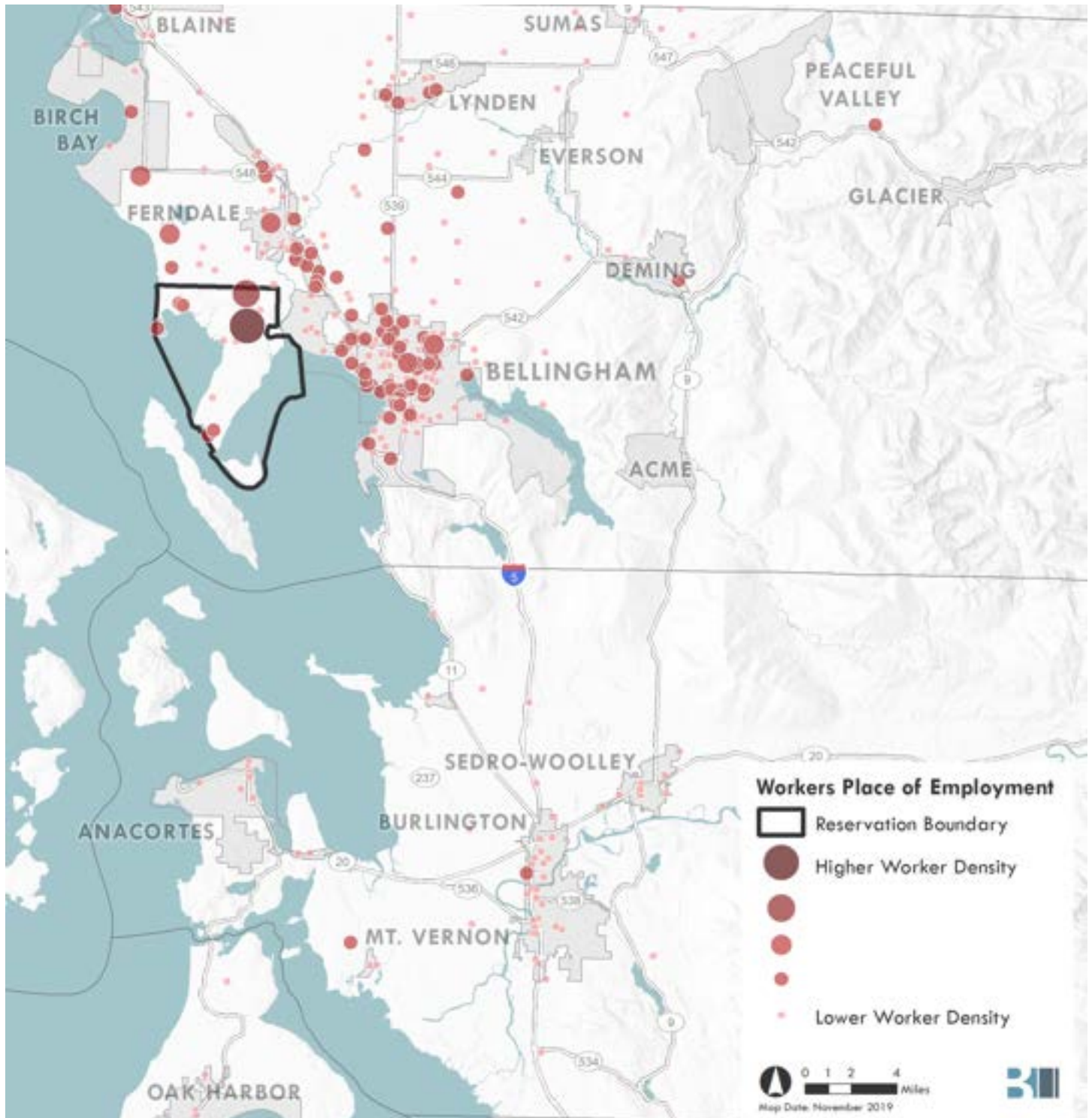
Exhibit 4-3. Lummi Small- and Medium-Sized Businesses

Sources: *Lummi Chamber of Commerce, 2019; BERK, 2019.*



Most Reservation residents who are employed (61%) work within 10 miles of their home. About 24% of employed Reservation residents have longer commute 25 miles or more, and the extra demand on their time means they are more likely to rely on daycare or other supportive services for children.

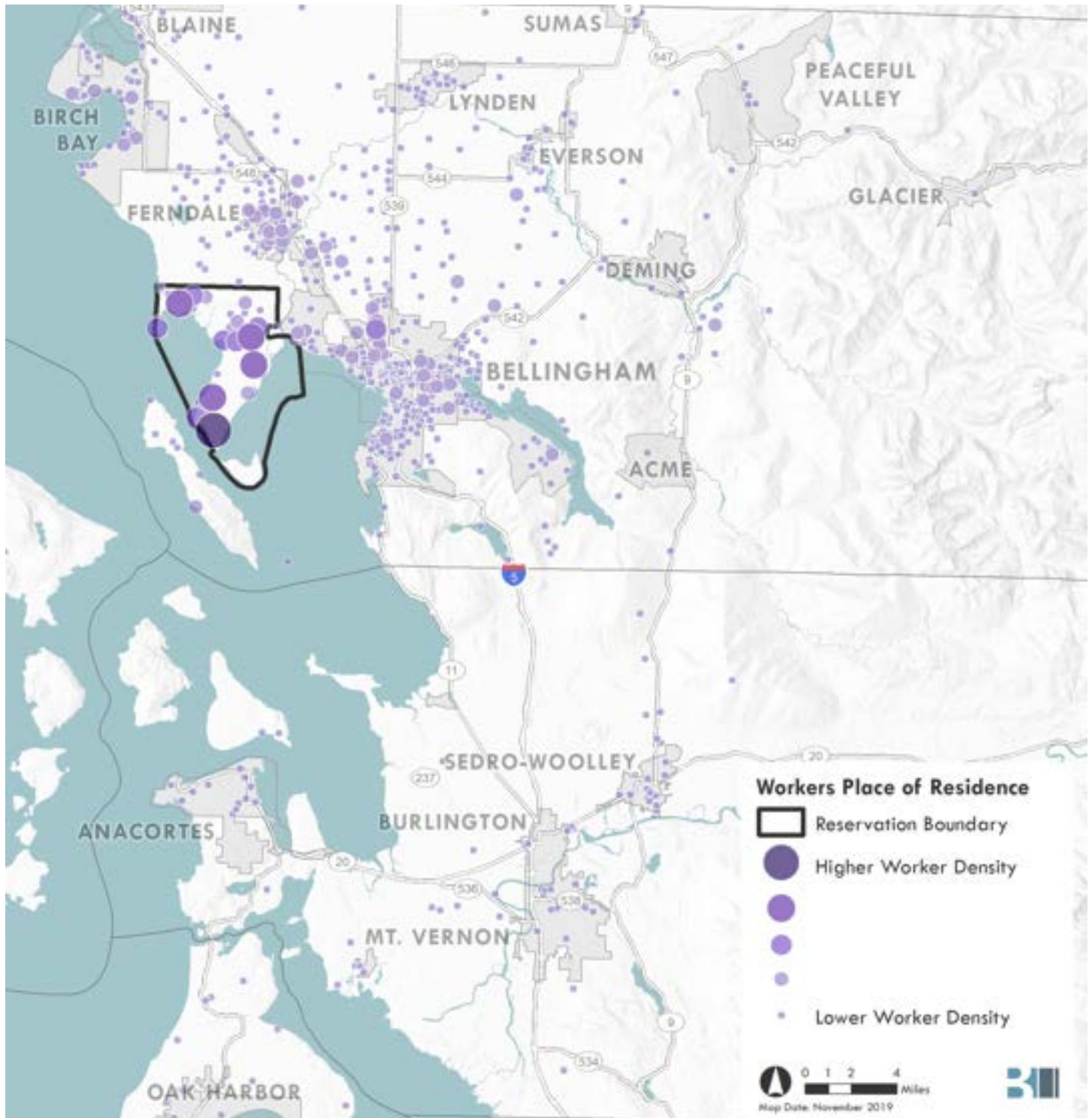
Exhibit 4-4. Journey to Work Analysis, Lummi Reservation Residents.



Note: According to employment data, almost half (44%) of Lummi Reservation residents who work are employed within the Reservation. Those who work off-Reservation commute primarily to Bellingham (21%) and Ferndale (5%). Off-Reservation employment centers include the two nearby oil refineries and the aluminum smelter.

Sources: Census OnTheMap report, 2017; BERK, 2019.

Exhibit 4-5. Journey to Work Analysis, Lummi Reservation Employees



Note: According to employment data, almost half (44%) of Lummi Reservation residents who work are employed within the Reservation. Those who work off-Reservation commute primarily to Bellingham (21%) and Ferndale (5%). Off-Reservation employment centers include the two nearby oil refineries and the aluminum smelter.

Sources: Census OnTheMap report, 2017; BERK, 2019.

LIBC Employee Picnic, 2014.



According to American Community Survey data, high unemployment and low household incomes are challenges facing the community. Unemployment on the Reservation hovers just below 11%, almost twice that of Whatcom County (6.8%) and three times that of Washington State as a whole (4.6%). Median household income on the Reservation is roughly 10% lower than in Whatcom County overall (see **Exhibit 4-6**) Statistics about employment and income on the Reservation count all residents including non-Indians. However, according to anecdotal information, tribal members may have higher rates of unemployment and lower household incomes than the average for the Reservation overall.

Exhibit 4-6. Unemployment and Median Household Income, 2017

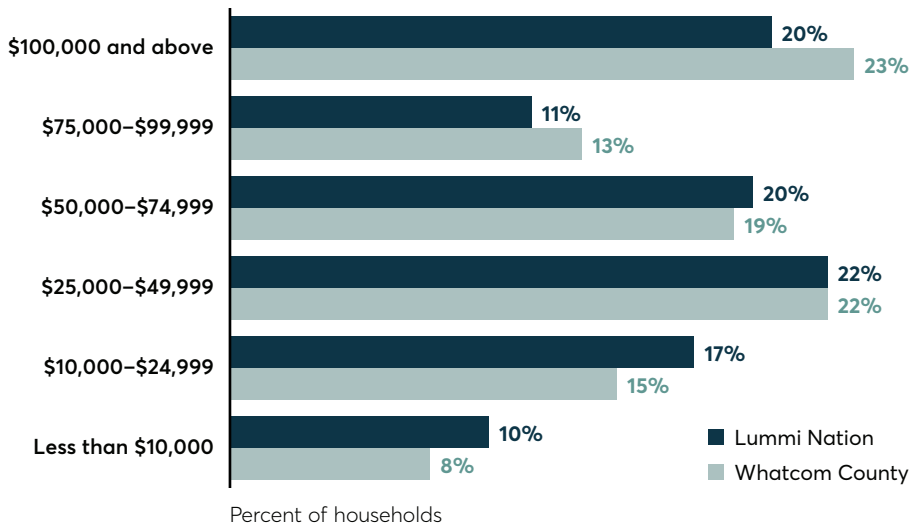
Measure	Lummi Nation	Whatcom County
Unemployment rate	10.9%	6.8%
Median household income	50,747	56,419

Sources: American Community Survey DP03 5-Year Estimates, 2013-2017; BERK, 2019.

A family of three in the Bellingham area is classified by HUD as low-income if their household income is \$57,000 or below.² Based on these standards, close to half of Reservation residents qualify as living in a low-income household. Another metric to identify financially vulnerable households is the poverty rate. ACS data reports that 22% of Lummi Reservation residents qualify for poverty status, compared to 15% for Whatcom County and 12% across Washington State. See **Exhibit 4-7**.

² Based on *2019 HUD standards for Bellingham MSA*.

Exhibit 4-7. Household Income by Income Bracket, 2017



Source: American Community Survey DP03 5-Year Estimates, 2013-2017; BERK, 2019.

Internet Infrastructure

The Lummi Office of Economic Policy reports that much of the Reservation lacks access to broadband internet service. This lack of connectivity inhibits career development and workforce training, makes the area less desirable for locating businesses, and affects other sectors like education and emergency services. Providing internet access across the Reservation is a key priority for economic development for the coming years.

Foreign Trade Policy

In 1896 the Lummi Nation was awarded status as a Foreign Trade Zone (FTZ) destination. This designation allows for the tariff-free import of goods. If a pre-determined level of value-added work is then completed, the goods can be resold to US markets at a reduced tariff. The benefits of this status were largely reduced with the adoption of the North American Free Trade Agreement (NAFTA), allowing free trade with Canada. With changes to international trade policy and increased trade activity throughout the Pacific Rim, there is potential for new opportunity using this FTZ status.



Weavers teaching weavers, 2011.

Challenges & Opportunities

- **High rates of unemployment and low household incomes affect Reservation residents.** Training for employment that leads directly to well-paying jobs is key to address these issues. Ensuring that social supports, such as daycare and after-school programming, are available is important for families with children.
- **The declining marine industry has left many tribal members searching for other career opportunities.** Quality vocational training and support for entrepreneurship can help address the need to prosper in a shifting economy. Programs promoting local agriculture and food service could reinforce Lummi traditions of environmental stewardship while strengthening food sovereignty. Opportunities for off-season jobs can keep seafood industry workers financially afloat.
- **Tourism and recreation.** A diverse and stable local economy that includes alternatives to fishing is a vital need of the Lummi Nation. Investments in amenities that attract tourists may be a viable industry to explore. Example strategies could include a museum or similar cultural attractions, as well as recreational amenities and events.
- **Small, locally owned businesses need support and resources.** These types of enterprises empower communities to grow by strengthening from within. Connecting entrepreneurs with resources, such as financing or incubator space, can dramatically improve their chances of survival. Ensuring that broadband internet is available across the Reservation will allow more residents to work from home or locate within Lummi boundaries.
- **Tribal members request improved transparency and clarity from LIBC.** Lummi members desire access to information about taxes and Lummi finance. This information could be shared publicly through an online portal to promote trust and accountability for leadership.
- **Workforce development is a high priority for tribal members.** Echoing a theme that came up during community outreach conducted for the 2010 Community Plan, outreach efforts for this Plan also revealed a demand for additional vocational and technical development programs, as well as entrepreneurship training. Equipping and strengthening entrepreneurship and microenterprise was also discussed, with a particular desire to promote food service within the Reservation. Residents would like also to see more Lummi employees at Silver Reef Casino Resort, strengthening its role as an economic engine for tribal members.

Lummi fisherman.
Photo credit: Damon Winter/The New York Times/Redux.



Our Plan

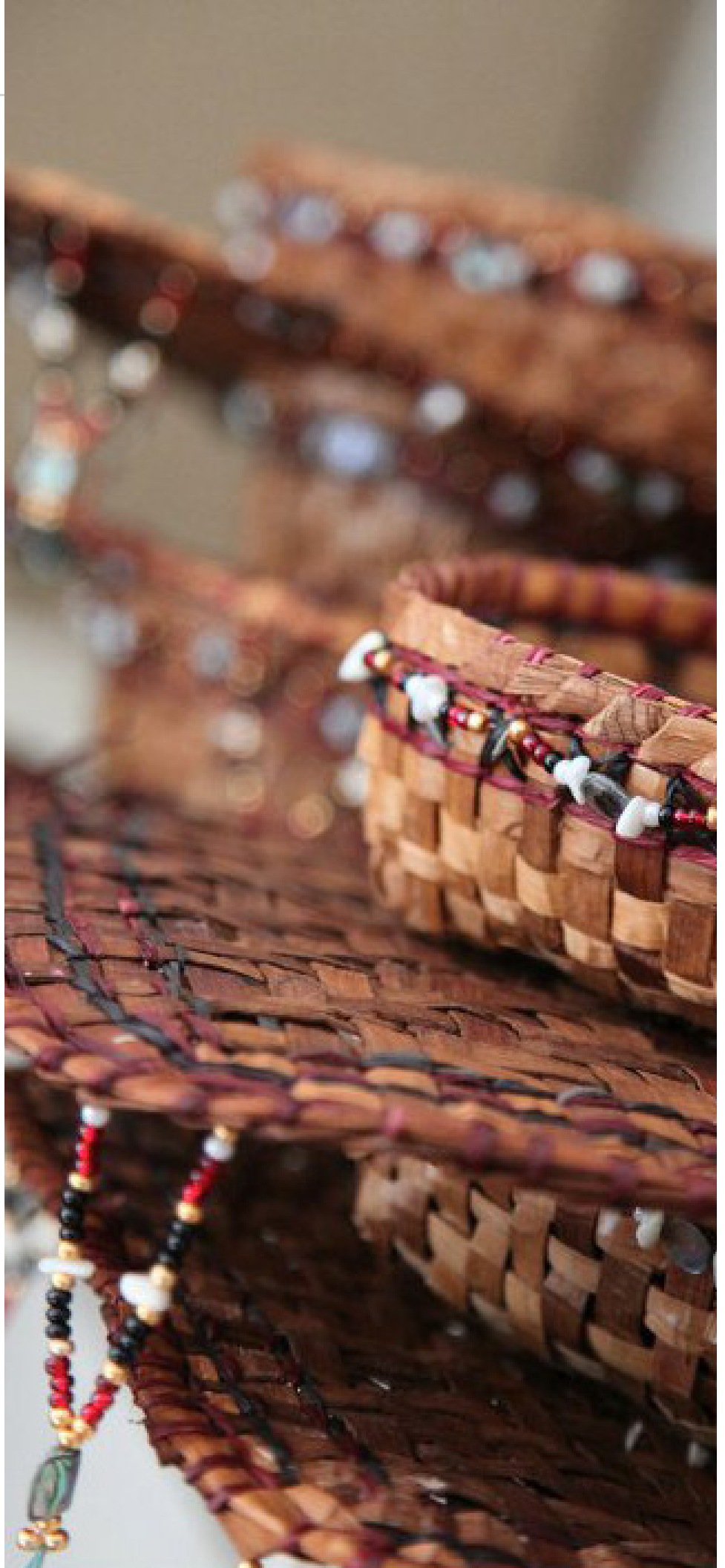
The Economic Development Plan works toward the vision of prosperity and sustainability for all Lummi Nation community members. This vision is achieved via policy, programmatic, regulatory, and incentive-based components:

- The economy supports a range of opportunities for the differing needs, lifestyles, and skillsets among tribal members.
- Job opportunities and key industries reflect the values of the Lummi Nation.

*Lummi Nation School
graduation caps.*



*A forestry stand on reservation
after a commercial thinning.*





*Coast Salish
Winter Festival.*

- There is access to robust, reliable infrastructure and services across the Reservation.
- Education and training programs prepare both youth and adults for success in the modern economy.
- A strong network of daycare, elementary, middle, and high school education programs ensure that children of all ages are cared for, invested in, and cherished as the future of the Lummi Nation.

Our goals and policies provide our aims, guidelines, and strategies to implement this plan.

Goals & Policies

Goal ED-1: The Lummi economy includes diverse employment opportunities, with both full-time and shorter-term seasonal employment options that support traditional culture and values.

Policy ED-1.1: Create an economic development plan with a focus on the I-5 properties and Gooseberry Point.

Lummi Nation Early Learning Center.



Policy ED-1.2: Broaden the employment options available to tribal residents in the fishing sector by improving and investing in needed facilities.

Policy ED-1.3: Work with Lummi fishers, artists, and farmers to develop a public market on the Reservation.

Policy ED-1.4: Train tribal shellfish growers to perform beach nourishment activities at appropriate times of the year to increase the clam and oyster production on Lummi tidelands.

Goal ED-2: The Lummi Nation is a place where small business and micro-enterprises flourish.

Policy ED-2.1: Remove barriers to self-employment.

Policy ED-2.2: Connect tribal members to CDFI resources such as financial education, credit building, and savings.

Policy ED-2.3: Identify resources which specifically promote businesses in food service and agriculture, such as the First Nations' Native Agriculture and Food Systems Scholarship funding.

Goal ED-3: Investments in infrastructure and amenities create and grow businesses important for the Lummi Nation’s long-term economic health.

Policy ED-3.1: Ensure broadband internet is available throughout the Lummi Reservation.

Policy ED-3.2: Improve transit access and availability to support easy access to local and regional jobs.

Policy ED-3.3: Increase access to affordable housing.

Policy ED-3.4: Provide affordable daycare options for Lummi Nation members.

Policy ED-3.5: Increase connectivity in the Reservation through new streets and trails systems that connect tribal members to opportunity within and outside the Reservation.

Goal ED-4: Partnerships and collaboration help support economic development for the Lummi Nation.

Policy ED-4.1: Establish regular meetings with staff from Whatcom Council of Governments, Whatcom County, City of Bellingham, City of Ferndale, and Port of Bellingham to stay informed about current issues and build trust by learning more about each other’s priorities.

Policy ED-4.2: Establish regular meetings between elected officials as a necessary first step to establishing long-term cooperative relationships.

Policy ED-4.3: Establish regular meetings with regional organizations such as the Northwest Indian Fisheries Commission, Affiliated Tribes of Northwest Indians, National Congress of American Indians, Division of Economic Development/Native American Business Development, and the U.S. Department of Commerce, Economic Development Administration.

Goal ED-5: Lummi Nation members have access to education, workforce development programs, and training that leads to family-wage job opportunities.

Policy ED-5.1: Connect Lummi businesses with workforce development programs from Lummi CDFI, Bellingham Technical College, Western Washington University, Whatcom Community College and regional organizations like the Workforce Development Council.

Policy ED-5.2: Promote technical skills for jobs in the Food Service, Agriculture, Construction, and Healthcare sectors that pay family wages and are located near or within the Lummi Nation.

Policy ED-5.3: Connect the NWIC with tribal businesses and employers to implement career pathways that lead to family-wage jobs.

Policy ED-5.4: Provide vocational training to Lummi Nation School students.

Exhibit 4-8. Economic Development Action Plan

	Implementation Action	Responsibility
	Goal ED-1: Diverse employment opportunities.	
<i>Policy Connections: Transportation</i>	*Initiate subarea planning for Gooseberry Point and the I-5 properties, with a strong economic development focus.	Planning, Lummi Economic Development Division
	*Improve the marine infrastructure at Gooseberry Point, including modernization of boat launching facilities.	Planning, Lummi Economic Development Division
	*Explore the creation of a seafood processing plant.	Lummi Economic Development Division, CDFI
	*Consider building a cold storage facility.	Lummi Economic Development Division, CDFI
<i>Policy Connections: Youth & Education</i>	Expand access to daycare services by acquiring the NWIC daycare or use the Veteran's hHall for expansion.	Education
	<i>Policy Connections: Youth & Education</i>	Integrate vocational training within secondary school curriculum.
	*Consider a comparable wage/salary/retirement/pensioncompensation Pplan for Lummi Nation School teachers to improve retention.	Lummi Economic Development Division, Education
	*Encourage students along tracks that lead to higher education, with programs such as Running Start and Native Pathways.	Education, NWIC
	Create a career technology center to address the need for vocational training for family-wage jobs.	Office of Economic Policy, Lummi Economic Development Division
	Create training programs, in partnership with or with employer inputcollaboration with employers, for occupations expected to grow.	Lummi Economic Development Division, TERO
	*Consider opportunities to utilize leverage FTZ status, given changes to national trade policy.	CDFI, Office of Economic Policy
	Leverage Opportunity Zone status to attract business investment on the Reservation.	Lummi Economic Development Division, CDFI, NWIC
	Work with community members to create a Lummi Living Wage definition and action strategy.	Office of Economic Policy

Implementation Action	Responsibility
Goal ED-2: Entrepreneurship and small business development.	
*Connect entrepreneurs with available financial resources through local CDFI, ONABEN, USDA Rural Business Development Grants, Western Washington's Small Business Development Center or other organizations focusing on small business development, native businesses, or rural investment.	CDFI
Support entrepreneurship on the Reservation by operating a business incubator site where tribal members can spend 3-5 years growing a business with access to resources and low overhead costs.	Office of Economic Policy, CDFI
*Identify resources which specifically promote businesses in desired industries, such as food service and agriculture or daycare providers.	Office of Economic Policy, Lummi Economic Development Division
*Continue environmental enhancement efforts through Portage Bay Partnership, allowing for shellfish harvest and restoration of water quality.	Natural Resources
Goal ED-3: Infrastructure investments.	
Conduct needs analysis and identify funding for reservation-wide broadband access.	Office of Economic Policy
*Expand access to regional job centers through innovative on-demand transit services, such as VanPool.	Transportation
*Create formal and informal agreements such as Memoranda of Understanding and interagency procedures to guide coordination between tribal and county planning agencies.	Planning, Lummi Economic Development Division
*Continue to explore the provision of natural gas service on the Reservation.	Public Works
Goal ED-5: Workforce development.	
Through public-private partnerships, connect with local employers to understand occupations in demand, and discuss necessary skillsets for success in occupations that pay family wage salaries.	Lummi Economic Development Division, NWIC (BAC), NWIC American Indian Business Leaders (AIBL) Chapter
Develop programming through high school and NWIC that directs talent toward available career opportunities.	Lummi Economic Development Division, Education, NWIC
*Develop a loan repayment assistance program for all Lummi tribal members.	Lummi CDFI

*Policy Connections:
Youth & Education;
Culture*

*Policy Connections:
Transportation*

*Policy Connections:
Youth & Education*

Implementation Action	Responsibility
Goal ED-6: Clear, predictable, and transparent government.	
Publish regular financial reports, made available to all tribal members.	Council Operations
Provide business updates on the operations of LIBC, connecting tax dollars to services provided.	Council Operations, Tribal Gaming Agency
Maintain publicly accessible presence, through a website or social media page, with regular updates tracking progress toward achieving project goals and celebrating accomplishments.	Lummi Commercial Company
Goal ED-7: Maximize the economic benefit of Silver Reef Casino Resort and the Loomis Golf Course.	
*Establish on-site daycare to support employees with young children at Silver Reef Casino Resort.	Tribal Gaming Agency
Partner with company leadership to ensure that skills training aligns with Silver Reef Casino Resort & Loomis Golf Trail needs.	TERO, Tribal Gaming Agency, Lummi Economic Development Division
Identify a quota for tribal shellfish fishers growers to sell to the Casino and restaurants.	Tribal Gaming Agency, Office of Economic Policy
*Work with the community to identify the desired benefits from ownership of Loomis Golf Course. Consider benefits such as Lummi membership, youth programs, and economic potential.	LIBC

Policy Connections:
Youth & Education



Policy Connections:
Parks & Public Spaces;
Health & Wellness



Goal ED-6: Clear, predictable, and transparent tribal government policies create a climate that supports economic growth.

Policy ED-6.1: Maintain a dialogue with existing business owners to seek ways to support business retention and expansion.

Policy ED-6.2: Explore methods of taxation that support Lummi businesses and local governance.

Policy ED-6.3: The Lummi Nation maximize the economic benefit gained from the Silver Reef Casino Resort and the Loomis Gold Course for tribal members.

Policy ED-6.4: Explore changes to management policies to maximize benefits to Lummi members.

Policy ED-6.5: Build wraparound amenities to support Lummi employment at these facilities.

Action Plan

Exhibit 4-8 identifies implementation initiatives or strategies related to culture the Tribe is prioritizing to accomplish prior to the next Community Plan Update. Action steps listed in more than one department are highlighted with an asterisk.

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5 COMMUNITY DESIGN FRAMEWORK

Purpose

This chapter addresses existing urban design patterns and establishes a framework for future land use and urban form that concentrates mixed-use development in compact, cohesive, walkable place-based nodes.

Issues & Trends

Land Use Overview

The Reservation is located in Whatcom County in northwest Washington State, about six miles west of the City of Bellingham. Located at the convergence of Puget Sound, the Strait of Juan de Fuca, and the Lummi and Nooksack Rivers, the 12-square mile peninsula houses abundant wildlife, beautiful and productive landscapes, and daily life activities for Lummi Nation members and others. The Reservation includes roughly 12,500 acres of mixed-use uplands and floodplains, 8,000 acres of tidelands, and approximately 38 miles of saltwater shoreline.

Exhibit 5-1. Major Land Areas

Sources: Google Maps, 2019; MAKERS, 2019.



The Reservation has the character of a rural fishing village. It is mostly forested, or open space, much of which is wetlands. Its shorelines are lined with residences, and institutional, commercial, and service uses are found along Kwina Road, at Gooseberry Point, and along Slater Road. Farmland, typically leased to non-Indian farmers, occupies the diked and drained floodplain in the northern third of the Reservation, formerly a marine estuary with tidal influences. Forage and seed crops predominate, but the soils on several hundred more acres are too saline for agriculture.

Tribal member housing is located along the Reservation roadways or concentrated at historic locations and in tribal housing enclaves. Three non-Indian residential communities are located at Sandy Point, Sandy Point Heights, and on the west shore of the peninsula and Gooseberry Point.



*Lummi Bay
tidelands.*

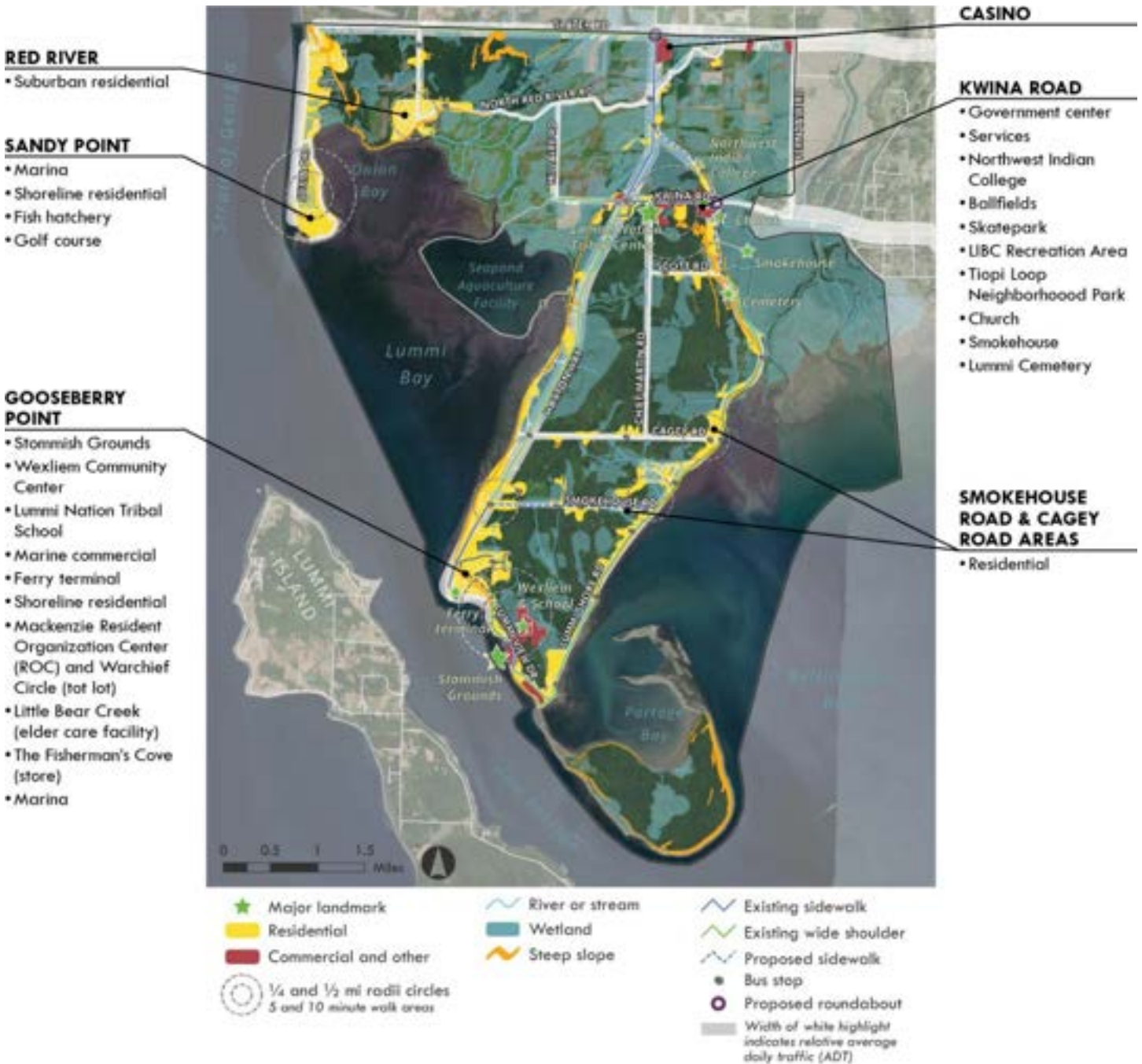
Topography

The area in the interior of the Lummi Reservation peninsula has a gently rolling terrain with elevations ranging from sea level to about 200 feet. Twenty-six miles of low and high bank shorelines surround the Reservation. These shorelines include scenic view property with beachfront recreational use. Portage Island is also gently rolling, rising to 200 feet along the east side where abrupt banks drop to a sandy beach. At low tide, a narrow spit connects Portage Island to the mainland.

Community Assets: Activities, Destinations, & Landmarks

Exhibit 5-2 highlights existing activities, assets, and general land uses.

Exhibit 5-2. Existing Community Design Conditions



Sources: Google Maps, 2019; MAKERS, 2019.

Lummi fisherman.
Photo credit: Damon Winter/The New York Times/Redux.



Land Uses & Activities

Fishing Village

With a long history as a fishing village, boating and fishing activities are woven throughout the landscape. The 2016 Parks, Recreation, and Open Space Plan states, “The Lummi Nation is an ancestral people closely tied to the water and a large percentage of the tribal population either own boats used regularly for recreation or participate in water related recreation.”¹ Some activities supporting a fishing way of life include:

- **Boat storage.** Boat storage at homes is common. Additional boat storage is found at Fisherman’s Cove, and larger boats are stored at marinas in Bellingham or Blaine.

¹ 2016 Parks, Recreation, and Open Space Plan Update, p. 23.

- **Boating access.** A boat ramp near Fisherman's Cove and informal launch points around the peninsula allow for access to the bays and beyond. At Sandy Point, homes, docks, and the marina are integrally connected.
- **Boat building and repair.**
- **Fuel and supplies.** The fueling dock at Fisherman's Cove is critical for fishers.
- **Fish processing.** Several smokehouses are cultural resources. A cannery has been identified as a need.
- **Fish buying stations.** A licensed fish buyer buys the fish from Lummi fishers.

Civic Amenities & Assets

Community gathering spaces, open spaces, and recreation facilities on the Reservation include the following:

- **Stommish Grounds**, near the peninsula's southern point, is a large area used for recreation and festivals, such as the Canoe Journey's Stommish Water Festival. It has a boat launch, boat storage, parking, lawn, and culturally significant places, such as the Stommish Hall, Vets Buildings, Pavilion, Canoe Shed, and Bone Game Shed.
- **Wex'liem Community Building**, located in Gooseberry Point near the Lummi Nation School, is a flexible venue used for community events.
- **Northwest Indian College** offers ballfields, a skatepark, and a log building used for meetings, dances, and community events.
- **Lummi Nation School** facilities include a track, sports field, gymnasium, and playgrounds.
- **LIBC Main Campus Rec Center** includes tennis courts, a half basketball court, and pickle ball.
- **The Lummi Nation Tribal Administration Building** is constructed with heavy timber beams inspired by traditional Coast Salish architecture, with lobby seating and a coffee shop.
- **Neighborhood parks and recreation centers** located in residential developments include the Tiopi Loop Neighborhood Park and the Mackenzie Resident Organization Center, as well as small tot lots and fitness facilities at daycare centers.



*Early morning on
Hales Pass.*

Tribal Preserves/Open Space Network

The Tribal preserves and open space network includes the following key areas:

- Portage Island
- Oyster Bay
- Nooksack Delta
- Shorelines
- Stommish Grounds

Scenic Resources

Scenic resources that have cultural significance include the following areas:

- Hales Passage
- Lummi Shore Drive
- Rural landscapes

Gateways, Barriers, & Edges

Lummi Bay and Bellingham Bay define the edges of the Reservation's land area, and as shown in **Exhibit 5-1**, the major land masses are separated by the Lummi and Nooksack River floodplains. Steep slopes, shown in orange in **Exhibit 5-2**, run along many of the shorelines, challenging pedestrian access.

Entrances to the Lummi Nation Reservation lack gateway features that would offer a sense of arrival to visitors. The Lummi Nation long-range transportation plan proposes roundabouts at Slater Road and Haxton Way, and at Kwina Road and Lummi Shore Drive; these present opportunities to design gateway features. Additional locations for potential gateways to the Reservation and to major neighborhood centers are noted in **Exhibit 5-3**.

Connections: Streets & Paths

Major roads run along the peninsula's shoreline and cut through the Reservation. Existing pedestrian facilities and those proposed in the Draft 2019 Transportation Plan are mapped in **Exhibit 5-2**. Notably, Sandy Point and Kwina are not easily walkable or bikeable. Internal neighborhood connectivity is also lacking.

Neighborhood Types & Character Areas

The following are designated Reservation Residential Villages, meaning that they feature concentrated housing to preserve open space and natural resources elsewhere. Each has its own history, character, and level of development.

Kwina Road & NWIC/Tribal Government Village

Kwina Road sits on an east-west axis between the Lummi River delta and Mt. Baker. The Lummi Nation Tribal Administration Building and Northwest Indian College are located here along with services and residences, making it the most intensely developed corridor and employment center on the peninsula.

Buildings for a variety of uses have been developed in this area separately and without design features or pedestrian connections that would combine to offer a sense of a unified and connected neighborhood.



Kwina Road, Looking East to Mt. Baker.
Source: Google Maps, 2019.

Mix of Uses on Kwina Road.
Source: Google Maps, 2019.

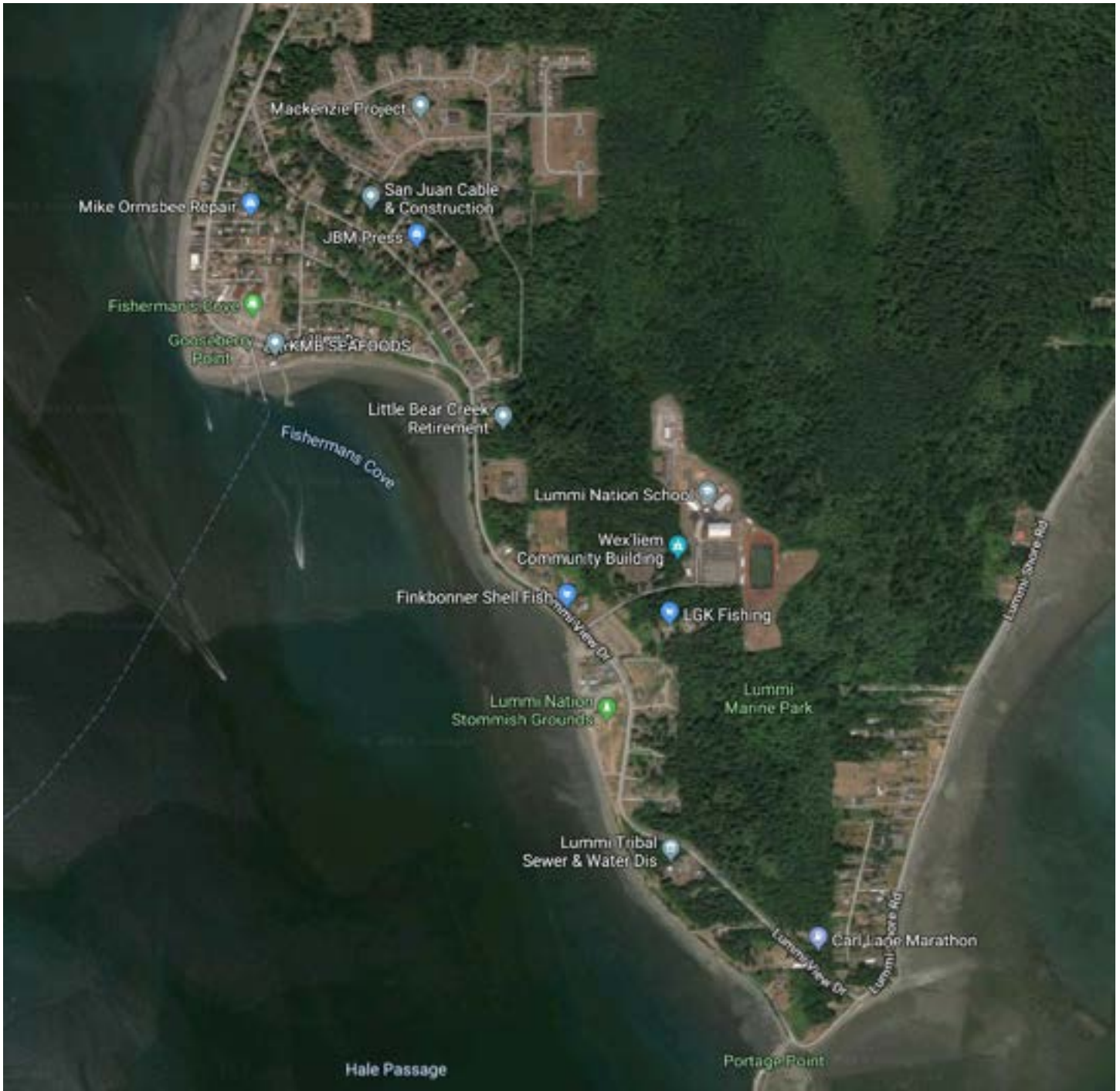


Tribal members digging for clams near Gooseberry Point.



Gooseberry Point

Gooseberry Point has a cluster of culturally important uses, including the Stommish Grounds, Lummi Nation School, and Wex'liem Community Building, as well as commercially important uses, including the ferry terminal and marine commercial businesses. Smaller community-oriented gathering places like tot lots and basketball courts make this more of a complete neighborhood. The placement of Little Bear Creek retirement home in the area connects elders to gathering places and the school for better opportunities for intergenerational activities.



Aerial of Gooseberry Point.
Source: Google Maps, 2019.

Homes with private docks on Sandy Point.



Sandy Point/Sandy Point Heights (& Red River)

Sandy Point includes shoreline residences, beaches, a marina, and a community garden. Many waterfront homes have docks with private boat storage and access to the water and marina. Notably, these areas do not have pedestrian connections to the peninsula.



*Sandy Point and Red River.
Source: Google Maps, 2019.*



I-5 Properties.
Source: Google Maps, 2019.

Lummi Economic Development Village

Known as the “I-5 properties,” this area may be more easily developed than places on the peninsula and offer opportunities because of its closer proximity to Bellingham and I-5. (See the largely undeveloped parcel to the SW of Slater Road.) The Nation is developing a master plan for the area. Future opportunities include walkability and housing.



Paddle to Squaxin, 2012.

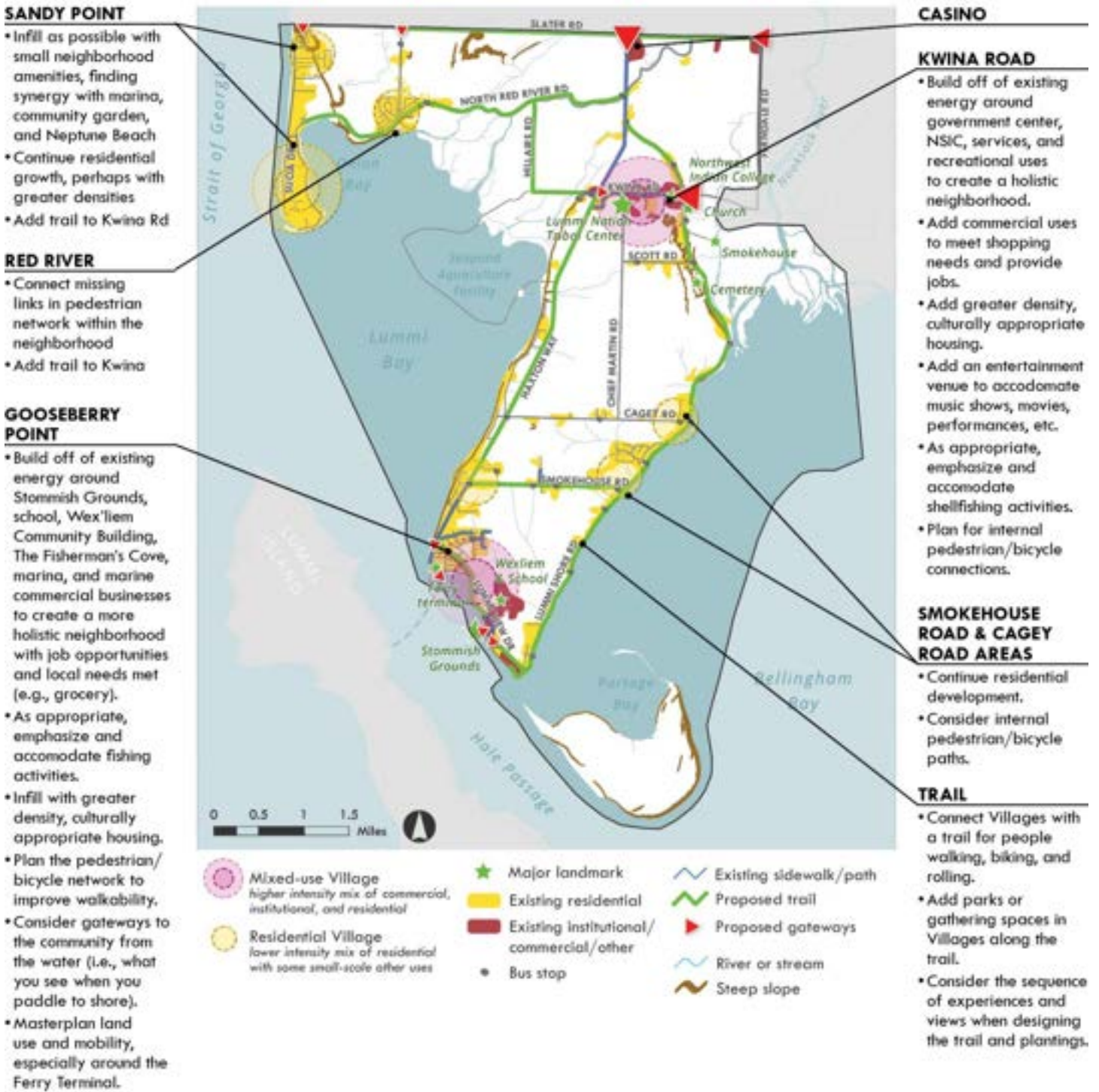
Our Plan

Community Design Framework

The Community Design Framework illustrates the vision and foundational concepts of the Community Plan and integrates key themes of the public input and vetting by Lummi Indian Business Council department directors. The Community Design Framework includes design ideas for streets, parks and open spaces, neighborhood districts, culture, economy, environmental quality, and livability.

The Community Design Framework uses the existing street network and land use patterns to create logical nodes of development within the Reservation. It envisions these nodes to be place-based districts roughly equivalent in size to a five-minute walk neighborhood—a principle for creating a walkable community. The Vision Framework Plan informs many of the goals, policies and actions contained in the Community Plan.

Exhibit 5-3. Existing Community Design Framework Map



Sources: MAKERS, 2019; BERK, 2019.

Place-based Districts

The Community Plan calls for strengthening and fostering distinct identities for five place-based character districts or villages as shown in **Exhibit 5-2**: Sandy Point, Red River, Gooseberry Point, Smokehouse Road and Cagey Road Areas, and Kwina Road. The districts' boundaries correspond with the five-minute-walk neighborhoods shown in **Exhibit 5-3**.

The Community Design Framework takes a closer look at each of the districts or villages to identify their unique qualities, strengthen their character, and consider how future development might tie to the sea, forest, earth, and sky guiding principles found in the existing community design guidelines.

Focused Density & Compact Neighborhoods

The Community Design Framework envisions the villages as compact neighborhoods that will be the focus of future development. The dashed circles identify quarter-mile and half-mile radii, or 5- and 10-minute walks, illustrating the distances that people are generally willing to walk for their needs. Much of the residential zoning covers existing wetlands and open space. Concentrating future development in these areas can promote walkability, preserve the rural nature of undeveloped land, and efficiently utilize existing utilities and infrastructure.

Chapter 6 of this Plan proposes land use and zoning designations that support mixed-use development in the five villages of Gooseberry Point, Kwina Road, Sandy Point, Red River, Smokehouse Road and Cagey Road Areas.

These mixed-use villages, especially Kwina and Gooseberry Point, are envisioned to function as holistic neighborhoods with the addition of more homes and a synergistic mix of uses. In a predominately rural area, it is important to carefully consider what uses are appropriate, feasible, and likely to be enjoyed and valued by community members. Appropriate spaces may include community and recreational uses (especially playgrounds and youth facilities) that offer ways for people to gather and recreate, daycares, community gardens, artist live-work spaces, and small meeting spaces that can be used to incubate new businesses or provide workforce training or wellness programs.



Lummi youth skateboarding.



*Doralee P. Solomon
Salmon Run/Walk.*

Parks & Open Space System

The Community Design Framework envisions a trail that connects the five villages, provides multimodal transportation options, encircles the peninsula providing a sequence of changing water and inland views, incorporates stormwater management features, includes street trees and landscaping that improve the public realm, and provides environmental benefits. Future parks or open spaces are envisioned along this trail, creating a continuous system of public green spaces accessible to pedestrians and motorists.

In addition to this linear open space, the Community Design Framework also envisions parks and open spaces in each village for residents of all ages to gather and recreate.

Complete & Connected Street System

Given the far distances between and among villages, creating comfortable walking conditions so that car use is not necessary is important. As described above, the Framework envisions a trail connecting the five villages, and most importantly filling the gap between the three villages of Sandy Point, Red River, and Kwina. In addition to the major trail, existing narrow streets with relatively low traffic volumes—Chief Martin Road, Scott Road, and Cagey Road—will be used by people walking, biking, and rolling. Maintaining low vehicular speeds will be important for safety and comfort.

*Lummi fisherman.
Photo credit: Damon Winter/
The New York Times/Redux.*





*Oyster reef on
Lummi Bay.*

Green Infrastructure Systems

The Community Design Framework envisions the inclusion of several sustainable design elements that maintain environmental health, especially water and air quality and wildlife habitats, even as places develop with more intense land uses. These elements include the installation of green stormwater infrastructure systems, the addition of new parks and open spaces, tree canopy preservation, and expanded transportation choices with complete pedestrian networks.

Subsistence Living & Connection to Water

The Community Design Framework seeks to encourage community resilience in the face of climate change. It supports elevating and adapting the fishing, shellfishing, and other subsistence living ways of life as a critical part of community resilience. The Framework also encourages future development that considers access to the tideflats and waterways and physical or symbolic connections to the water.

Goals & Policies

Goal CD-1: Higher-density, compact, mixed-use neighborhood districts accommodate expected future demand for residential and commercial development within the Reservation and increase access to economic opportunities.

Policy CD-1.1: Concentrate future development in five place-based character districts or villages on the Lummi Reservation: Sandy Point, Red River, Gooseberry Point, Smokehouse Road and Cagey Road Areas, and Kwina Road.

Policy CD-1.2: Encourage site and building design of new development that is consistent with the Community Plan vision and desired urban form, with an emphasis on creating a walkable environment.

Policy CD-1.3: Implement signage, public art, and landscaping to clarify neighborhood edges, identify entry points, and support neighborhood identity.

Policy CD-1.4: Expand the existing street network to create a safe, comfortable environment for pedestrians.

Goal CD-2: An interconnected network of parks and open spaces improves quality of life and supports the transition to a neighborhood structure of dense, compact, mixed-use districts.

Policy CD-2.1: Create a masterplan for a non-motorized trail that connects the five villages and reflects the urban design goals of this Community Plan.

Policy CD-2.2: Develop future parks or open spaces along the non-motorized trail connecting the five villages, creating a continuous system of public green spaces accessible to pedestrians and motorists.

Policy CD-2.3: Build parks and open spaces in each village for residents of all ages to gather and recreate.

Goal CD-3: Environmental stewardship is integrated with future development.

Policy CD-3.1: Encourage community resilience in the face of climate change.

View from Portage Island.

Goal CD-4: Future development within the Reservation reflects the culture and values of the Lummi Nation.

Policy CD-4.1: Protect reservation burial sites through intergovernmental agreements between the Lummi Nation, the federal government, Washington state, and local county and municipal governments.

Policy CD-4.2: Create intergovernmental agreements to protect off-Reservation cultural resources and the establish off-Reservation Lummi cultural preserves.

Policy CD-4.3: Strengthen design guidelines for future development that emphasize Lummi culture and values and establish a consistent design aesthetic.

Policy CD-4.4: Establish gateways, consistent with the Reservation-wide design aesthetic, that welcome visitors at entrances to the Reservation.

Policy CD-4.5: Protect scenic resources from development through land use regulations, conservation easements, and other techniques.

Action Plan

Exhibit 5-4 identifies implementation initiatives or strategies related to culture the Tribe is prioritizing to accomplish prior to the next Community Plan Update.

Exhibit 5-4. Community Design Framework Action Plan

Implementation Action	Responsibility
Goal CD-1: New development reinforces a neighborhood structure of higher-density, compact, mixed-use districts.	
Update Lummi Nation zoning to implement the transition to a neighborhood structure with focused density and place-based districts.	Planning
Goal CD-4: Values-based development and design principles guide planning and growth on the Reservation.	
*Develop design guidelines for new construction and adaptive rehabilitation for a Reservation aesthetic aligned with Lummi values and traditions.	Planning, Sche'lang'en
Create a menu of housing types and styles that align with Lummi values and community needs.	Planning, Sche'lang'en
*Create gateway elements that mark the various entrances to the Reservation and identify Residential Village nodes.	Planning, Sche'lang'en
*Expand Stommish Grounds.	Planning, Natural Resources
*Enact regulations to protect scenic resources, such as Hales Passage and Lummi Shore Drive.	Planning, Natural Resources
*Develop a capital improvement plan to ensure infrastructure planning supports development opportunities.	Planning, Public Works
*Develop a Stormwater Master Plan to guide stormwater infrastructure development.	Planning, Public Works

Policy Connections:
Culture; Parks & Public Spaces





6 LAND USE

Purpose

This chapter describes Lummi Reservation land use patterns and identifies future challenges and opportunities in achieving the Lummi community vision for land use. It also includes goals, policies and action steps that implement the community vision.

Issues & Trends

Land Ownership

According to the 2015 Lummi Nation Comprehensive Land Use Plan, approximately 30% (4,000 acres) of the Reservation is now owned by non-Indians. 2,500 acres of this land is vacant and partially developable, mostly in large-acreage agricultural or forested land. Non-Indian land includes approximately 2,700 lots on the Reservation, 1,800 of which are residential properties averaging 9,000 square foot parcels, which have been subdivided and platted in fee simple status. About half of these residential subdivisions remain undeveloped.

FEE SIMPLE & FEE-TO-TRUST CONVERSION

The real estate term fee simple describes a landowner’s complete and total ownership of a piece of land and all properties on it. The fee simple owner may do anything they wish on the land as long as it falls within established easements, local guidelines, and zoning laws.

Fee-to-Trust land acquisitions, also called “land into trust,” transfer a land title to the United States of America to be held in trust for the benefit of an individual Indian or Tribe. Land brought into Trust must be free of all encumbrances, environmental impacts, and development risk.

—U.S. Department of the Interior Indian Affairs

When non-Indian land on the Reservation is sold, State real estate transaction rules guide the process of fee simple real estate sales by realtors or by owners. The Lummi Nation does not benefit from these sales. In addition, low-density single-family housing units create service demands and impacts on Reservation infrastructure, services, and the environment without any ability to levy taxes and offset the burden.

The option of Fee-to-Trust conversion is a complex, time-consuming, and expensive process. Land brought into Trust must be free of all encumbrances, environmental impacts, and development risk. Although 2,500 acres of vacant, fee-simple land may be available for development, the feasibility of re-acquisition and use of this land is constrained by high costs. Except for fee properties strategically purchased by the LIBC, Trust land is where the bulk of tribal and individual Indian development will occur in the next twenty years.

Land Tenure

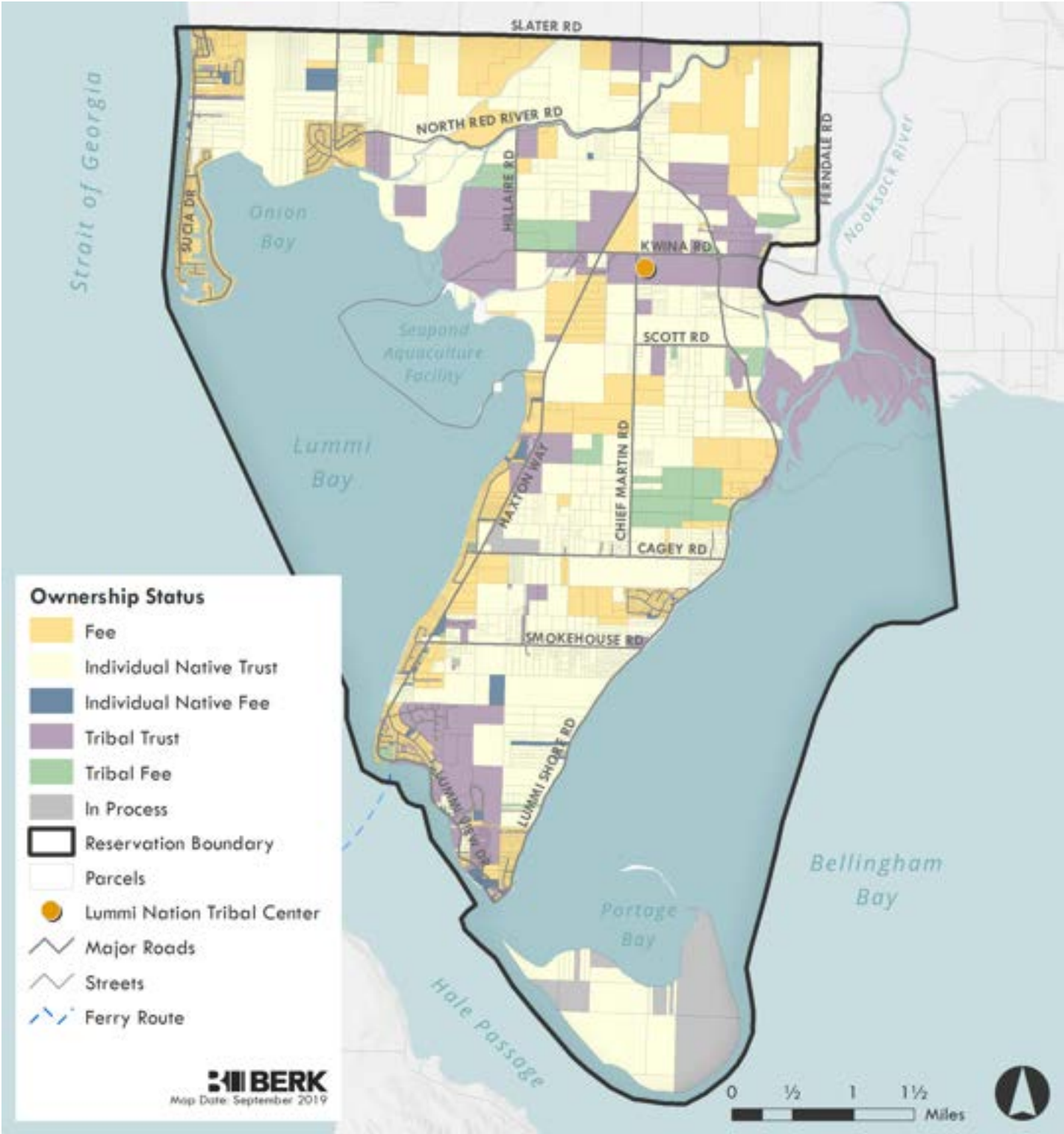
Much of the land on the Reservation is very difficult and costly to develop because of its complex ownership status involving multiple interest holders. The typical Indian land tenure is an undivided interest in one or multiple Trust parcels which are owned by the United States and assigned to the Lummi Nation or to individual Indians. About 1,500 parcels (over 10,750 acres) are either Trust or fee-simple lands owned by individual tribal members or the Tribe, with 78% of this acreage being in Trust status (see **Exhibit 6-1** and **Exhibit 6-2**). Trust land is administratively difficult to develop as it is constrained by regulatory and implementation policies including fractionated interests, probate backlog, clouded titles, limited BIA review schedules and funding, and inadequate historic and survey records.

Exhibit 6-1. Land Ownership Status

Measure	On-Reservation (acres)	Off-Reservation (acres)
Fee	2,645.2	—
In Process	978	82.8
Individual Native Fee	150.3	—
Individual Native Trust	6,396	0.2
Tribal Fee	547.3	1,647
Tribal Trust	2,397.9	330.6

Source: Lummi Nation Comprehensive Land Use Plan, 2015.

Exhibit 6-2. Map of Land Ownership Status



Sources: Lummi Nation, 2019; BERK, 2019.

*Paddle to
Squaxin, 2012.*



Under BIA policy, the amount of an individual's land interest is proportional to how close his or her kinship is to the original assignee. After a few generations, the holdings of the extended family of an original assignee have been so diluted, making most land unusable. Interests in land with multiple undivided ownerships are called "fractionated interests." Two-thirds of Trust land (nearly 5,000 acres) is in undivided ownership.

The effects of fractionation are stifling. Some parcels have hundreds of undivided interest holders; the actual land equivalent for some may be a piece of ground smaller than a single room. A person might then have dozens of interests in separate Trust assignments; each one equally unusable and with no say where their land is located or what resources or constraints it has for development.

When non-Lummi, non-Indian, or absentee interest holders each have interests in the same land, individual development options for personal housing may never be allowed. In most cases no one may use their land interests without permission of a super-majority of all other owners.

Under-developed parcels generally average 10 acres or larger with 85% left vacant of any land use.

Zoning

Title 15 of the Lummi Nation Code of Laws contains the Land Use, Development and Zoning Code. This title provides controls for land use, development, and zoning for all lands within the boundaries of the Lummi Reservation and all lands held in trust for the Lummi Nation by the United States outside of the boundaries of the Reservation.

Zoning districts are identified on the official Zoning Map (see **Exhibit 6-4**). Zoning on the Lummi Reservation is primarily based on land ownership patterns. Acreages of land within each zone are listed in **Exhibit 6-3**.

ZONING DISTRICTS

Residential: The residential zone district designates land for detached single-family homes with a density range comparable to both suburban and rural residential development, depending on the type and level of services available and neighboring development.

- Rural Residential: 1-3 dwelling units per acre
- Suburban Residential: 5-7 dwelling units per acre

Commercial: The commercial zone district designates land suitable for commercial and business uses to meet objectives in economic development and provide employment opportunities to improve the economic conditions of the tribal government and individual tribal members.

Light Industrial: The light industrial zone district designates land suitable for low impact industrial uses to meet economic development objectives and provide employment opportunities to improve the economic conditions of individual tribal members.

Forestry: The forestry zone district designates land suitable for the sustained cultivation and production of forest products and for low-density rural residential development, where such mixed uses are consistent with the Comprehensive Plan and the Forest Management Plan (LIBC 2010).

Agriculture: The agriculture zone district recognizes the importance of agriculture and designates land for farming activities. The designation also allows accessory and supporting uses to farming, including residential uses and resource conservation.

Open Space: The open space zone district designates land for preservation, conservation and restoration of environmentally and culturally sensitive areas and for low impact, outdoor recreational uses.

Marine: The marine zone district comprises an area for treaty-reserved and Tribally controlled fishing activities, seafood production, and harvest for the benefit of tribal members.

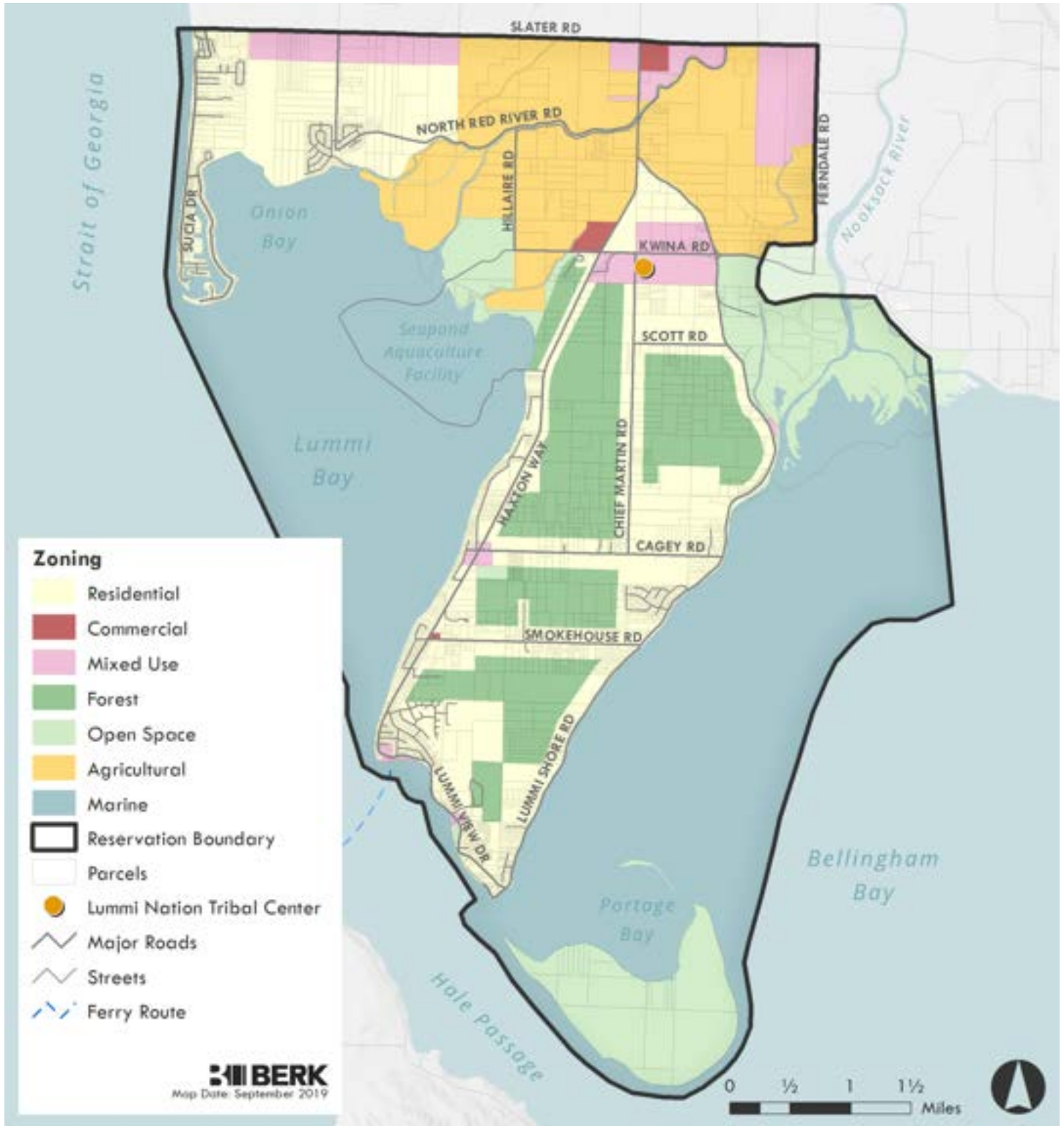
Mixed Use: The mixed use zone district is intended for important community centers where planned multiple uses are allowed and desirable. Any proposed use allowed in the immediately adjacent zone districts is allowed in the mixed use zone district with a conditional use permit

Exhibit 6-3. Zone Acreage

Zone	Total Acres	On-Reservation	Off-Reservation
Forestry	2,279	2,279	0
Agriculture	2,967	2,885	82
Residential	4,676	4,673	3
Marine	10,626	10,626	0
Commercial	269	83	186
Mixed Use	1,076	1,036	40
Open Space	4,239	2,490	1,749
Total	26,132	24,072	2,060
Total (Non-Marine)	15,506	13,446	2,060

Source: Lummi Nation Comprehensive Land Use Plan, 2015.

Exhibit 6-4. Lummi Reservation Zoning Map, 2016



Sources: Lummi Nation, 2019; BERK, 2019.

Challenges & Opportunities

As described above, the Lummi Nation has conducted extensive planning and outreach to identify needs and direction for the future. This body of work clearly identifies the needs, aspirations and challenges facing the Lummi Community with respect to land use. Priority issues are briefly summarized in the following:

- **The Lummi Nation population is growing, and land use policies should reflect ways to accommodate higher future demand for residential and commercial development within the Reservation.** By designating compact, higher-density Residential Village nodes, the Lummi Nation can accommodate its growing population without overburdening its land and municipal services or destroying precious natural resources. Zoning that allows for a variety of housing types, a mix of uses, and nonvehicular connectivity in these areas will promote sustainable communities for the future.
- **Transportation access to economic opportunities within the Reservation and regionally to job centers is a key challenge.** Less than half (44%) of Lummi Reservation residents who work are employed within the Reservation (see [Chapter 4](#)). Those who work off-Reservation commute primarily to Bellingham (21%) and Ferndale (5%). Off-Reservation employment centers include the two nearby oil refineries and the aluminum smelter.
- **Access to economic opportunities is limited for some Reservation residents by distance and connectivity.** Concentrating commercial development at strategic locations, such as the I-5 properties and on Slater Road, allows for focused transit connections across Residential zones on the Reservation. Integrating services and smaller businesses within Residential Villages opens economic opportunity within walking and biking distance for more residents.
- **Tribal members wish to reclaim land previously sold to non-Lummi owners.** By developing a long-range strategic plan for land acquisition, the LIBC can reclaim Reservation parcels for community use.
- **Fractured land tenure creates complicated ownership structures that restrict benefits for ownership parties and render parcels unusable.** A legal strategy to comprehensively reform this policy would allow for productive use of these properties, create a generational wealth building opportunity for families, and remove complex legal barriers to inherited tribal property.
- **The Reservation has few options for access to healthy food.** The Lummi Reservation is classified by the USDA as a “food desert” —an area where



Kwina Village
Open House, 2010.

there is limited access to fresh fruits and vegetables and other healthy whole foods. Food deserts often offer more convenience stores and fast-food restaurants than supermarkets and grocery stores. Food deserts can contribute to poor health, higher levels of obesity, and diet-related diseases such as diabetes and heart disease. Given this challenge, there is an urgent need for strategies around increasing access to fresh produce and food to support healthier communities.

Our Plan

Our vision for Land Use is to:

To enhance and preserve the Reservation as a homeland/or the Lummi People.

To achieve this vision, our Natural Environment and Sustainability Plan has policy, programmatic, regulatory, and incentive-based components:

- Seek a cooperative, inter-governmental role in the growth and prosperity of the region.
Develop effective land management plans and plan for land needed to support growth and preserve green space.

- Use the Zoning Code and Zoning Map to allocate land for housing, open space and mixed use development, determined by Tribal needs and market demand.
- Ensure that services and regulations administered by the Planning Department are consistent with the Land Use, Zoning and Development Code Title 15), the Flood Damage Prevention Code (Title I5A), the Building Code Title 22 and Development Regulations.

Our goals and policies provide our aims, guidelines, and strategies to implement this plan.

Goals & Policies

Goal LU-1: The Lummi Nation’s future development is at a scale and intensity that accommodates higher growth and contributes to a compact, connected urban form.

Policy LU-1.1: Update zoning and design standards to promote attractive, and livable housing and mixed-use development within neighborhood nodes consistent with the cCommunity pPlan vision.

Policy LU-1.2: Update and refine the list of permitted land uses within mixed-use villages to allow a diverse range of housing types, and a synergistic mix of uses that include community and recreational uses, playgrounds, youth facilities, daycares, community gardens,, artist live-work spaces,, and small meeting spaces that can be used to incubate new businesses or provide workforce training or wellness programs.

Policy LU-1.3: Provide development incentives such as height bonuses to encourage the transition to a more compact, nodal development pattern.

Policy LU-1.4: Pursue land reacquisition for alienated lands and integrate these properties into mixed-use villages.

Evaluate agricultural lands within the Reservation for other uses that better support tribal needs. These uses could include fisheries habitat restoration, cultural uses, economic uses such as hydroponics and organic gardens, future mixed-use villages, or cultivation of indigenous plants including camas used in indigenous food preparation and grasses, used in traditional weaving.

Goal LU-2: Development of mixed-use Residential Villages creates compact, walkable neighborhoods.

Policy LU-2.1: Designate Kwina Road, Gooseberry Point, and Red River as mixed-use nodes or Residential Villages with a range of housing, services, and amenities.

Policy LU-2.2: Create neighborhood connectivity by linking streets and paths within and between Residential Village zones.

Policy LU-2.3: Incorporate amenities in Residential Villages, including community spaces, green features, community gardens, and small business spaces.

*Lummi fisherman.
Photo credit: Damon Winter/
The New York Times/Redux.*





*Turkey basket pick-up
at Lummi Commods.*

Goal LU-3: Strategically located Economic Villages increase access to jobs and economic opportunities for tribal residents.

Policy LU-3.1: Locate tribal enterprises within the boundaries of the Lummi Economic Village on Slater Road to maximize access to markets and minimizes traffic impacts on the Reservation.

Policy LU-3.2: Develop I-5 properties into a job-oriented Economic Village that includes some housing, services, and amenities.

Goal LU-4: The Lummi Nation's governance, development review processes, and development regulations support the vision of the community plan.

Policy LU-4.1: Create a fast, predictable, and customer-friendly permitting process.

Policy LU-4.2: Establish and maintain collaboration and dialogue with community stakeholders to promote ongoing improvements to the Nation's development review processes.

Policy LU-4.3: Seek input to remove barriers and ensure that development standards make it simple and cost-effective to build attractive, livable developments that are also affordably priced.

Policy LU-4.4: Continue to participate in and advocate for the Lummi Nation's interests in inter-governmental partnerships and regional efforts.

Policy LU-4.5: Restore land ownership to the Lummi Nation by re-acquiring alienated properties.

Action Plan

Exhibit 6-5 identifies implementation initiatives or strategies related to culture the Tribe is prioritizing to accomplish prior to the next Community Plan Update.

Exhibit 6-5. Land Use & Urban Design Action Plan

Implementation Action	Responsibility
Goal LU-1: The Lummi Nation's future development is at a scale and intensity that accommodates higher growth and contributes to a compact, connected urban form.	
Identify staff capacity to update zoning and development standards.	Planning
*Conduct a code audit to identify barriers to mixed-use and multi-family development and identify areas where the zoning and related regulations need updates such as to the Permitted Uses Table or other areas.	Planning, Public Works, Sche'lang'en
Identify modifications to regulations in support of innovative housing formats and alternatives such as ADUs and tiny homes.	Planning
Draft and adopt zoning and code amendments with input from the community.	Planning
Create a set of pre-permitted housing designs to streamline development of residences for tribal members.	Planning
*Complete an enhanced land inventory and capacity analysis. Identify areas suitable for development or for preservation.	Planning, Sche'lang'en
Goal LU-2: Development of mixed-use Residential Villages creates compact, walkable neighborhoods.	
Designate Gooseberry Point, Kwina Road and Red River as mixed-use Residential Villages.	Planning
Conduct subarea planning processes for these three nodes with community visioning sessions and workshops to gather public feedback.	Planning
Consider Sandy Point and Smokehouse Road neighborhoods for future Residential Village nodes.	Planning
Encourage infill housing and neighborhood services to foster more complete communities.	Planning
*Create a Master Pedestrian Plan for the Reservation. Create paths within and between Village nodes.	Planning, Transportation
*Consider a trail network connecting east to west across the Reservation, potentially along Slater Road, N Red River Road, and Smokehouse Road.	Planning, Transportation

Policy Connections:
Culture; Parks & Public Spaces

Policy Connections:
Housing & Homelessness
Policy Connections:
Transportation
Policy Connections:
Transportation; Parks & Public Spaces



*Runner on
Haxton Way.*

Implementation Action	Responsibility
Goal LU-3: Strategically located Economic Villages increase access to jobs and economic opportunities for tribal residents.	
*Develop economic development nodes at the commercial center along Slater Road and the newly acquired I-5 properties.	Planning, Lummi Economic Development Division
*Allocate land to economic development programs and projects likely to provide job opportunities for tribal members.	Planning, Natural Resources, Lummi Economic Development Division
*Promote a natural resources-based economy by identifying and protecting sites for perpetual harvest of timber or non-timber forest products.	Natural Resources, Lummi Economic Development Division
Goal LU-4: The Lummi Nation's governance, development review processes, and development regulations support the vision of the community plan.	
Invest in an electronic permitting system.	Planning
*Monitor and track fee land properties for sale within the Reservation.	Planning, Sovereignty & Treaty Protection Office
Monitor housing sales in the Reservation.	Planning
Address land ownership challenges by continuing to implement the procedures and priorities of the Strategic Land Acquisition Plan.	Planning



7 HOUSING & HOMELESSNESS

Purpose

This element addresses the housing needs of the Lummi Nation community including development regulations, affordable housing strategies, and resources for individuals experiencing homelessness.

This chapter includes:

- Population growth forecasts and development patterns
- Zoning regulations and housing types
- Housing affordability
- Resources for tribal members experiencing homelessness

Issues & Trends

Conditions & Trends

Demographics & Housing Inventory

The following discussion includes data from the U.S. Census Bureau's 2017 American Community Survey (ACS) 5-year Estimates. The ACS data is an estimate based on five years of surveying the community and represents trends and conditions in the community. Given the relatively small sample size for the Lummi Reservation, these estimates tend to have a larger margin of error than larger surveyed areas and should be considered a representation of the conditions rather than a precise count. The ACS data represents the best estimates available for recent years.

The total estimated population on the Lummi Reservation was 5,331 in 2017. This includes 2,920 members on reservation, 959 members living in Whatcom County but off reservation, and 1,379 members living outside Whatcom County. An estimated 4,064 were 18 years or older, including 743 age 65 or older. The Lummi Nation Comprehensive Land Use Plan (CLUP) projects that the 2035 total population will be 12,200 tribal members and their non-enrolled family members. This would mean an increase of 6,896 people, more than doubling the current population. The Lummi Economic Development department estimates that housing needs for Lummi members will also increase significantly over the next 20 years. See **Exhibit 7-1**.

According to ACS 5-year estimates, there were 2,145 housing units on the Lummi Reservation in 2017. Of this total, 1,842 units (about 86%) were occupied and 303 (14%) were vacant. For comparison, the 2010 U.S. Census found 1,989 housing on the Reservation, of which 95% were occupied, either year-round or seasonally.

Of the 1,842 occupied units, 1,202 (about 65%) were owner occupied and 640 (about 35%) were renter occupied. Reflecting the multigenerational nature of Lummi households, the average 2017 household size for homeowners was 2.96 persons and for renters 2.70 persons. The 2017 estimated median value of owner-occupied housing units was \$199,700. The median monthly rental was \$914. In 2017, the median household income was \$50,747, less than both the median income in Whatcom County and Washington state.

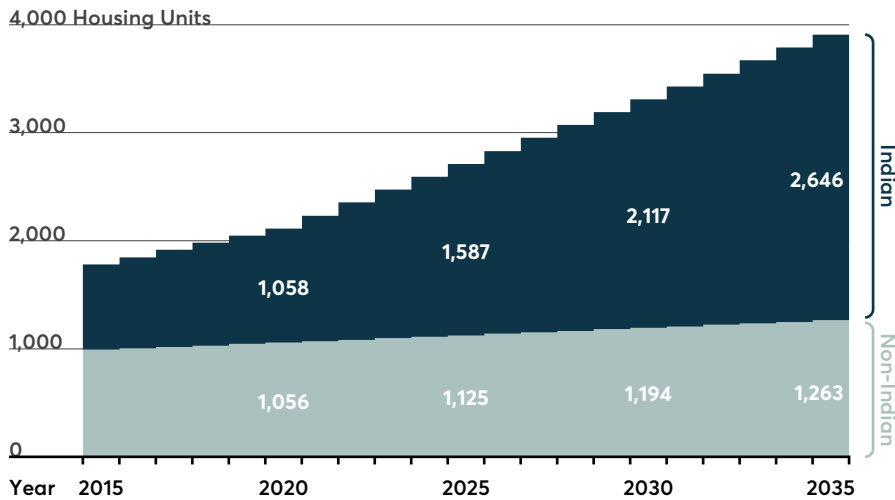


Exhibit 7-1. Lummi Nation Housing Projections 2015-2035, Indian and non-Indian Residents

Source: Lummi Economic Development, 2017.

Based on demographic characteristics and the projected population growth, the CLUP concludes:¹

Lack of adequate housing opportunities presents a formidable challenge in the years to come. Availability, socio-economic constraints, and physical and administrative barriers prevent tribal members from obtaining the housing they need. Shortages impose a ripple effect that adds to other social problems.

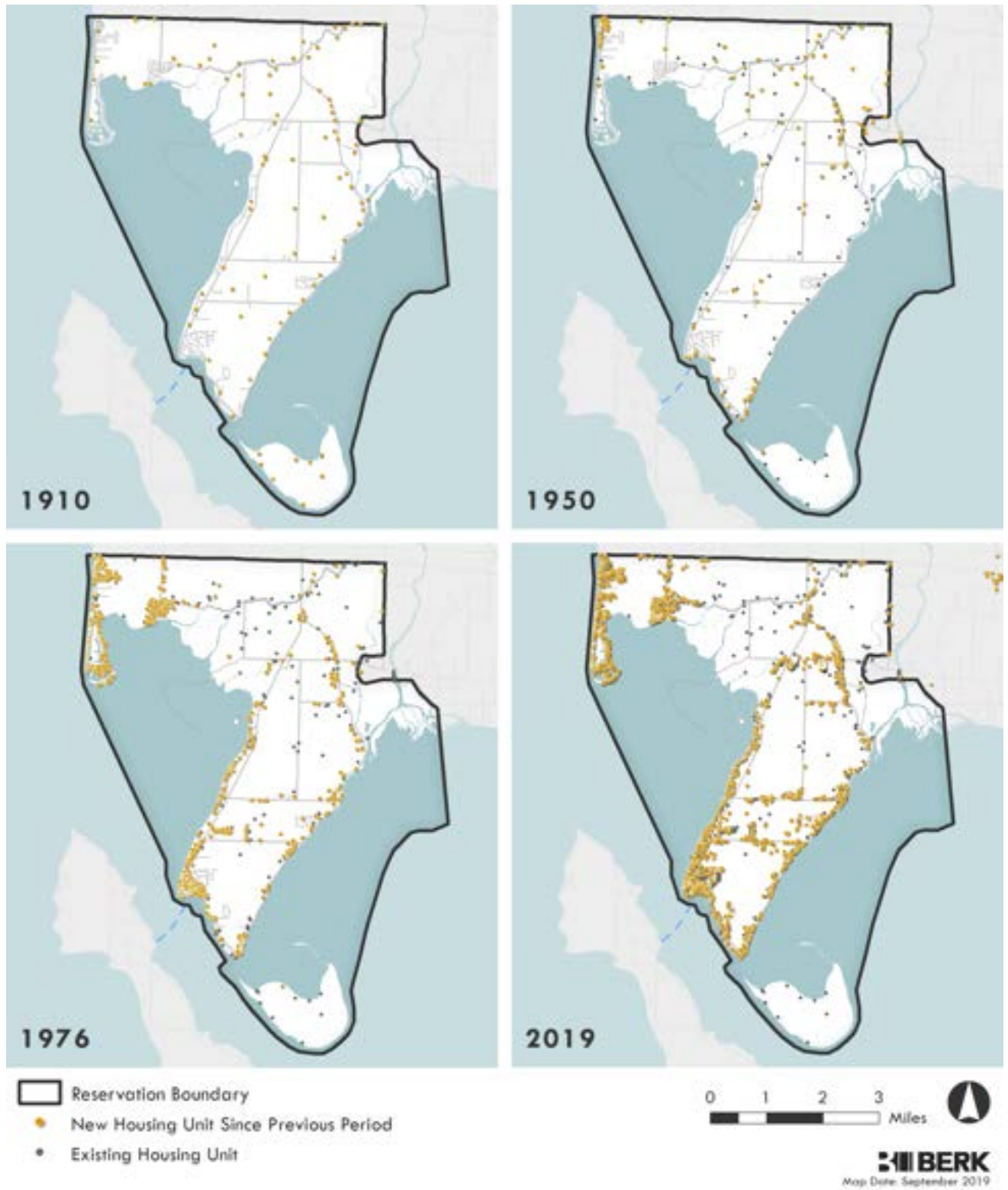
Housing Location & Character

Exhibit 7-2 illustrates building trends over the last 100+ years on the Reservation. Over this period, infrastructure improvements, including roadway connections, a potable water distribution and wastewater collection and treatment system, the Sandy Point Marina, and several tribal housing projects have fostered a trend towards higher density neighborhoods throughout the Reservation. In the past 43 years (1976-2019) the quantity of households has more than doubled, with a majority of units clustered along the coastlines.

Several distinct residential neighborhoods now exist, mainly along the shorelines of the Reservation including Sandy Point, Neptune Beach, Sandy Point Heights, Gooseberry Point, and Mackenzie. The Sandy Point neighborhoods, as well as the numerous waterfront parcels along the west shore of the Lummi Peninsula are predominantly owned by non-tribal

¹ Lummi Planning Department. *Comprehensive Land Use Plan*. September 2015.

Exhibit 7-2. Housing Growth 1910–2019



Sources: Lummi Nation, 2019; BERK, 2019.

members and developed as primary residences and vacation homes. The CLUP states that the typical site-built home in these areas is valued between \$265,000 and \$500,000. Lot and home prices in these areas are generally not affordable to most tribal members.

The east shore of the Lummi Peninsula and the numerous scattered subdivisions in the interior of the Reservation are almost exclusively tribal member owned properties. The CLUP reports that typical housing occupied by tribal members is a new or used manufactured mobile home or 30-to-50-year-old government housing. Often built below standard, rarely inspected, and not adequately maintained, the existing conditions of tribal dwelling units are below average quality and often fail to provide the proper shelter intended.

Homelessness

The 2019 Whatcom County annual "point-in-time" count of homelessness helps to illustrate the problem of homelessness. The 2019 homeless count found 700 homeless persons and 514 homeless households. The count found that 12% of homeless households identified as Native American, compared to 3.1% of the population identifying as Native American in the last census.

While this count of homelessness encompasses more than just the Lummi Nation, it is consistent with anecdotal concerns expressed by tribal members, and with a national Native American housing conditions assessment conducted in 2017, which showed that homelessness affects nearly all tribal areas. Nationally, 99.8% of tribal housing officials reported that doubling up (taking in family and friends who would otherwise risk homelessness) occurs in their tribal areas and 88% said households experience literal homelessness.²

Local organizations have started working to address issues of homelessness on the Lummi Reservation. Stepping Stones is a 501c(3) non-profit started by Lummi people serving tribal members experiencing homelessness. Two transitional housing sites have been established, with plans for building a network of tiny homes underway. This program brings awareness to the issue of homelessness within the Lummi Reservation and addresses poverty with a community-oriented strategy.

² *Housing Needs of American Indians and Alaska Natives in Tribal Areas. January 2017.*

Policies & Regulations

Residential Zoning

Title 15, Lummi Nation Code of Laws, contains the Land Use, Development, and Zoning Code. This title provides controls for land use, development and zoning for all lands with the boundaries of the Lummi Reservation and all lands held in trust for the Lummi Nation by the United States outside of the boundaries of the Reservation.

Title 37 establishes a Residential (R) zoning district that provides land for tracts of detached single-family homes with a density range comparable to both suburban and rural residential zones, depending on the type and level of services available and neighboring development. Rural densities are defined as 1–3 dwelling units/acre and suburban residential densities as 5–7 dwelling units/acre. Through a separate permitting process, multifamily development at densities of 9–12 dwelling units/acre may be developed. Primary uses in the residential zone include single-family detached and duplex residences, attached or detached multi-family developments with less than five units, home occupations, outdoor and indoor storage, temporary residences, agriculture, and wood growing products operations. Residential, temporary residential and accessory residential uses are permitted or conditionally permitted in other zones, including the Mixed-Use zoning district.

Residential zoning districts are identified on the official Zoning Map (see **Exhibit 6-4**).

Housing Services

Lummi Nation Housing Authority

The Lummi Nation Housing Authority (LNHA) was created in 2006 to remedy unsafe and unsanitary housing conditions, alleviate the acute shortage of decent, safe and sanitary low-income dwellings, and provide employment opportunities through construction and improvement of low-income dwellings. The LNHA is authorized through Title 37, Lummi Nation Code of Laws, which further describes its structure, authority and obligations.

The Housing Authority actively manages over 350 housing units on the Reservation. The majority of LNHA properties are clustered in the neighborhoods of Mackenzie and Kwina Village, along with a townhouse



*Lummi Nation Housing Authority
administration building.*

development on Smokehouse Road. Many previous projects were home ownership in focus, and thus are no longer under the management of LNHA. Today, LNHA offers a variety of housing types to tribal members, accommodating various life phases and challenges faced by low-income communities. Their largest development is a 118-unit apartment development in the Kwina Village area of the Reservation. They also manage a 45-unit community, Sche'lang'en Village, focused on serving residents actively participating in transformation and rehabilitation programs. Their housing stock consists of a combination of duplexes, triplexes, and small single-family homes.

Other Housing Services

Non-profit entities, such as Lummi Stepping Stones, also provide housing services to the Lummi Reservation. Lummi Stepping Stones, founded in 2016, currently manages two group homes—A Le Lang "Our People's Home" and Ne'Wi Leng "Welcoming Home"—and two tiny homes. The organization serve an average 50 to 60 men, woman and children who are affected by homelessness. It collaborates with a variety of tribal and non-tribal programs to provides services both on and off the Reservation.

Challenges & Opportunities

As described above, the Lummi Nation has conducted extensive planning and outreach to identify housing needs and direction for the future. This body of work clearly identifies the needs, aspirations and challenges facing the Lummi Community with respect to housing. Priority issues are briefly summarized in the following:

- **Provide an adequate supply of affordable, safe and secure housing on the Reservation.** An adequate housing inventory to meet demand now and in the future is noted as a high priority in virtually all the prior planning work. A land use needs assessment conducted by the Land Use Planning Department in 2013 identified a need for 1,800 new and 200 replacement units in the upcoming 20 years. The needs assessment estimated that 30% of these units should be in multifamily development. Expanding the housing supply would help to increase affordability, together with increased income levels associated with economic growth (see Economic Development chapter).
- **Meet the diverse housing needs of Community members.** Visions 2055 identifies a diversity of housing types as the Lummi Nation's primary housing policy. Needs that have been identified include housing for tribal elders, families and multi-generational households, as well as assistance for members who wish to live off-Reservation.
- **Supporting planning documents discuss the potential benefits of innovative housing types to meet diverse community needs.** Examples include mixed-use housing, clustered housing, or cottage housing. Development of these and other types of housing development could help meet a range of needs; increase access to services; support social interaction, a strong sense of community, and local economic growth; and conserve open space, resources and energy.
- **Focus future growth within Reservation Villages.** Visions 2055 calls for concentrated housing development within Reservation Residential Villages and states that this approach would preserve Reservation open space and natural resources amenities while meeting membership needs for increased Reservation housing and support services. Mixed use neighborhoods that include employment, housing, services, community centers, parks and other compatible uses all within walking distance would provide comparable benefits. Housing located near transit routes offers access to employment centers and schools. The 2013 Needs Assessment conducted by the

Outdoor play space at Sche'lang'en Village.

Planning Department calls for five or six village developments that include employment, along with 500 multifamily dwelling units and 200 single family units over the next twenty years.

- **Invest in improving conditions in existing homes.** As noted in the CLUP, the existing conditions of tribal dwelling units are below average quality and often fail to provide proper shelter. Preservation of existing housing stock in a safe and secure condition supports the physical and mental health of residents, the social and physical health of neighborhoods, and retains available affordable housing inventory over the long term.
- **Pursue innovative actions for supportive housing.** Possible actions identified in the CLUP include 1) facilitate maintenance, rehabilitation or replacement of existing housing however feasible, including tribally-back residential loan programs and 2) initiate self-help opportunities and programs for tribal members to exchange work, community service or housing construction for a home.
- **Help those who are homeless or at risk of homelessness.** Data from Whatcom County and nationally, together with anecdotal evidence, suggest that homelessness is a significant challenge for the tribal Community. Work currently being done by the Housing Authority and other organizations, such as Lummi Stepping Stones, seeks to provide housing and services to help people secure permanent housing. Additional data specific to the Lummi Nation may help further define the magnitude of this issue and opportunities for additional action.

Kwina Village Open House, 2010.



- **Support efforts to increase the feasibility of lending for residential development on trust lands.** For persons seeking to purchase, develop or improve a residential property, land status may be a key structural barrier. Land held in trust is not owned outright by the homeowner and cannot be used as collateral for securing a mortgage. On the Lummi Reservation, approximately 9,654 acres, or 74% of the upland area is held in trust (tribal trust, individual trust, in the process of becoming trust land).³ In addition, all of the approximately 105,00 acres of tidelands on the Reservation are in tribal trust status. Lenders who work in Indian Country suggest that, in addition to addressing the complexities of land status, strategies to reduce the barriers to homeownership and residential development include affordable and flexible lending products, homebuyer education, and counseling programs.⁴

³ Lummi Nation Atlas. March 2016.

⁴ Mortgage lending in Indian Country has jumped, but land policies remain a barrier. Urban Institute: Urban Wire Housing and Housing Finance. April 20, 2017. <https://www.urban.org/urban-wire/mortgage-lending-indian-country-has-jumped-land-policies-remain-barrier>. Accessed June 2019.

Our Plan

Focused housing in mixed-use nodes promote sustainable development.

This strategy allows efficient use of land within the Reservation to accommodate the increase in tribal population and maintain open space and natural resources amenities.

A diverse range of housing types.

A range of housing types suitable tribal members across ages, incomes and household sizes supports a high quality of life. Mixed-use villages will provide a variety of higher-density rental and home ownership housing, including small apartments, housing for larger families and multi-generational housing.

Transitional housing for members recovering from drug, alcohol or substance use disorder problems, and for survivors of domestic violence, are also encouraged.

Supportive services and synergistic uses create holistic neighborhoods.

In addition a diverse range of housing types to meet the housing needs of the Nation, mixed-use villages provide local services including a library, grocery and retail stores, small eateries, work sites, parks, and services for the elderly and children.

Goals & Policies

Goal HH-1: The Lummi Nation has an adequate supply of safe and healthy housing.

Policy H-1.1: Conduct an inventory of existing housing conditions and use population projections and community input to develop a housing needs analysis.

Policy H-1.2: Increase the supply of income-restricted affordable housing. A large share of the Lummi Nation members does not earn enough income to afford market-rate housing. The Nation could support and encourage more affordable housing development in partnership with the Housing authority to meet the needs of these community members.

Policy H-1.3: Focus Lummi Housing Authority grants on building housing units near identified nodes in mixed use neighborhoods.

Policy H-1.4: Connect Lummi households with resources and financing to upgrade and renovate homes falling into disrepair.

Goal HH-2: The Lummi Nation has a wide range of housing available to meet the diverse needs of different households at various income levels and stages in their life-cycle, ranging from young families, one-person households and inter-generational families.

Policy H-2.1: Encourage the development of a range of housing, including multi-family housing, in mixed-use nodes across the Reservation.

Policy H-2.2: Support the needs of an aging population. Managing these needs may require supporting the desire for some tribal members to “age in place” in their homes, while accommodating other tribal members in assisted living and nursing home facilities.

Policy H-2.3: Remove regulatory barriers to diverse housing types such as tiny homes, two and 3-bedroom multi-family units, and mixed-use housing formats.

Policy H-2.4: Provide assistance to tribal members to find suitable housing.

Policy H-2.5: Align pedestrian and transit routes to connect residential and mixed-use neighborhoods to employment centers, educational institutions, and healthcare providers.

Goal HH-3: Tribal members experiencing homeless have access to resources for shelter and social support.

Policy H-3.1: Develop a Lummi system to track and count rates of homelessness on the Reservation.

Policy H-3.2: Increase shelter capacity for tribal members experiencing homelessness, especially women.

Policy H-3.3: Participate in Whatcom County and other regional strategies to reduce homelessness.

Goal HH-4: Tribal members who wish to purchase land are free from legal and structural barriers to ownership.

Policy H-4.1: Create a legal liaison to assist tribal members with land ownership barriers.

Policy H-4.2: Communicate progress re-acquiring alienated properties.



Sche'lang'en Village.



Action Plan

Exhibit 7-3 identifies implementation initiatives or strategies related to culture the Tribe is prioritizing to accomplish prior to the next Community Plan Update.

Exhibit 7-3. Housing & Homelessness Action Plan

Implementation Action	Responsibility
Goal HH-1: Housing supply.	
Identify staff or consultant capacity for a housing needs analysis	Planning
Collaborate with the Lummi Housing Authority to ensure future Housing Authority projects are located around established nodes, connecting residents to resources.	Planning, Lummi Housing Authority
Encourage infill housing and neighborhood services to foster more complete communities.	Planning
Leverage Opportunity Zone status to attract financing for multi-family projects.	Planning
Goal HH-2: Diversity in housing stock.	
Inventory existing housing conditions to determine the current state of quality in housing, particularly focusing on low-income households.	Housing Authority
*Identify funding opportunities to complete necessary upgrades and repairs, particularly for housing stock that currently serves low-income families.	Planning, Family Services, Housing Authority
*Conduct a code audit to identify and remove any barriers to diverse housing types such as tiny homes, two and 3-bedroom multi-family units, and mixed-use housing formats.	Planning, Housing Authority
Create a program with "housing navigators," who point tribal residents toward suitable housing, help with credit-related issues, and give neighborhood tours.	Planning
Collaborate with Lummi CDFI on improving credit and access to capital for housing for tribal members.	Planning, Lummi CDFI
Goal HH-3: Homelessness.	
Put in place a program similar to the One Night County to accurately count the number of Lummi residents experiencing homelessness.	Family Services
Collaborate with existing efforts, such as the Stepping Stones tiny home project, to provide shelter for transitional periods.	Family Services
*Coordinate housing, workforce development, and healthcare services to connect tribal members experiencing homeless with needed support structures.	Lummi Housing Authority, Lummi Economic Development Division, Health Clinic
*Create shelter capacity for those experiencing domestic violence.	Family Services
Goal HH-4: Legal barriers to ownership.	
*Identify staff capacity for a point person to address legal barriers to land ownership for tribal members.	Planning, Sovereignty & Treaty Protection Office
*Raise property rights awareness among Lummi people and explain necessary steps to reclaim land.	Planning, Sovereignty & Treaty Protection Office

Policy Connections:
Land Use

Policy Connections:
Justice & Safety



8 TRANSPORTATION

Purpose

This chapter discusses the transportation network and mobility needs of the Lummi Reservation community. Developing a safe and well-connected system of infrastructure for pedestrians, bikers, drivers, and transit riders is the focus of this chapter.

This chapter includes:

- Existing conditions of road networks, sidewalks and trails, and public transportation options for Reservation residents.
- Gooseberry Point ferry terminal needs
- Identification of specific points for road safety improvements
- Exploration of future projects to promote connectivity and access



The Haxton Way Pedestrian Pathway is a 2-mile trail connecting the Silver Reef Casino to Kwina Road. It runs parallel to, but completely separate from, Haxton Way to create a safe route for pedestrians and cyclists. In 2011, solar-powered lighting was installed along the pathway as an added safety feature.

Issues & Trends

Conditions & Trends

Overview

Interstate-5 serves as the primary access for regional trips to and from the Reservation. Other major roads serving the Reservation include Marine Drive, Slater Road, Ferndale Road, and Haxton Way. Lummi Nation also provides transit service within the Reservation and to nearby areas. Whatcom County operates ferry service between the southern end of the Reservation and Lummi Island. There are over 65 miles of roads within the Reservation with a mix of ownership.¹

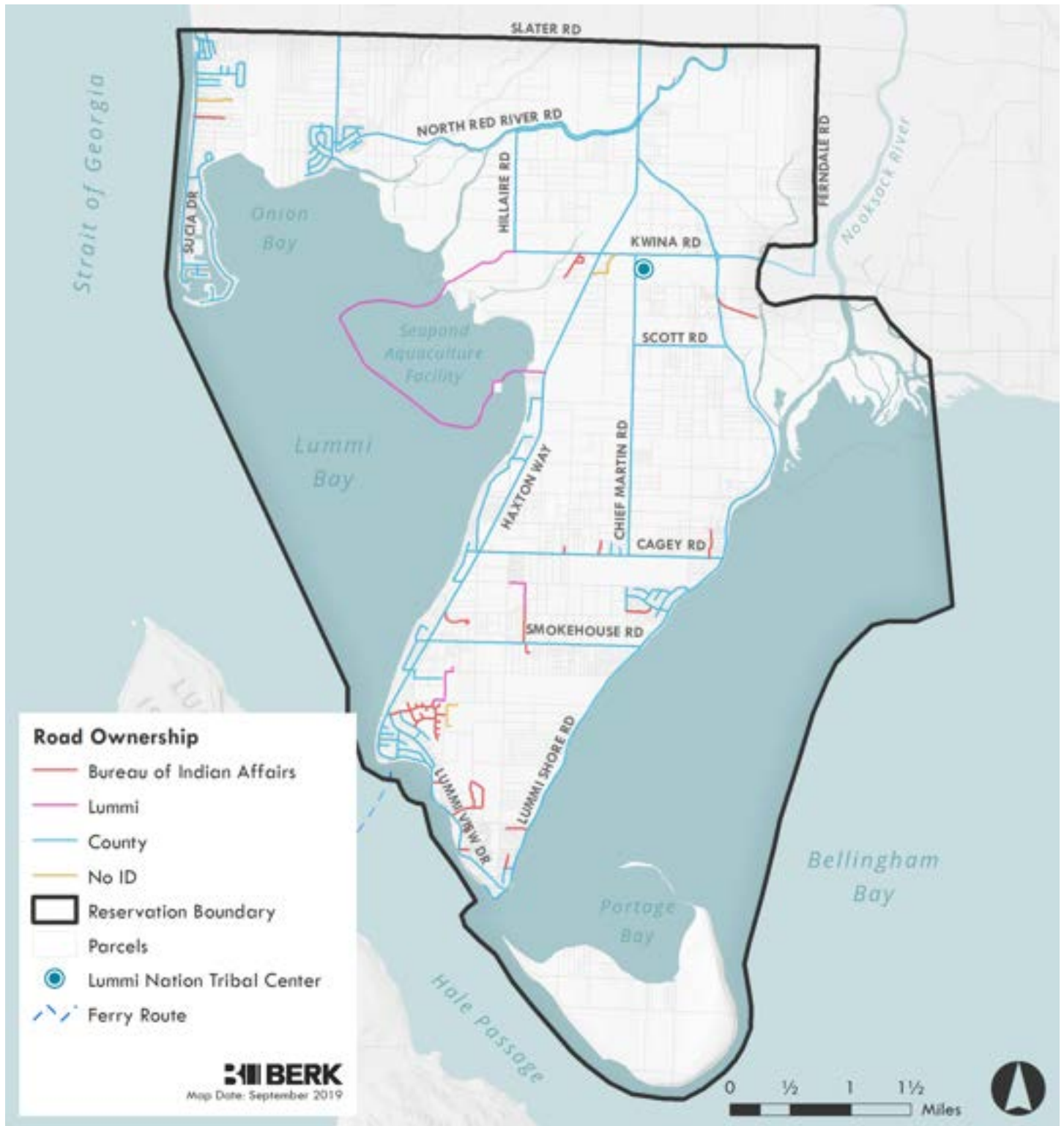
Roads

The Reservation is served by two main routes on the west and east sides of the peninsula (Haxton Way and Lummi Shore Road, respectively). Slater Road forms the northern boundary of the Reservation is the main east-west connection to Interstate 5. Slater Road is also a key connection to the population centers of Bellingham and Ferndale, and one of two entrances into the Reservation. Haxton Way is the only uninterrupted north-south route on the Reservation, running from Slater Road to Gooseberry Point. Lummi View Drive starts at the southern end of Haxton Way and follows the southern shoreline until it reaches Lummi Shore Road, which follows the eastern shoreline. Lummi Shore Drive connects with Haxton Way just south of Slater Road.

In addition, Smokehouse Road and Cagey Road run east-to-west, connecting Haxton Way to Lummi Shore Road. Kwina Road also runs east-to-west, then continues east as Marine Drive into the City of Bellingham. Kwina Road is a gateway into the Reservation especially for travelers to and from the City of Bellingham. See **Exhibit 8-1**.

¹ Lummi Nation Long Range Transportation Plan 2019, Gibson Traffic Consultants.

Exhibit 8-1. Roadway Ownership, 2019



Sources: Lummi Nation Long Range Transportation Plan, Gibson Traffic Consultants, 2019; BERK 2019.

Public Transportation

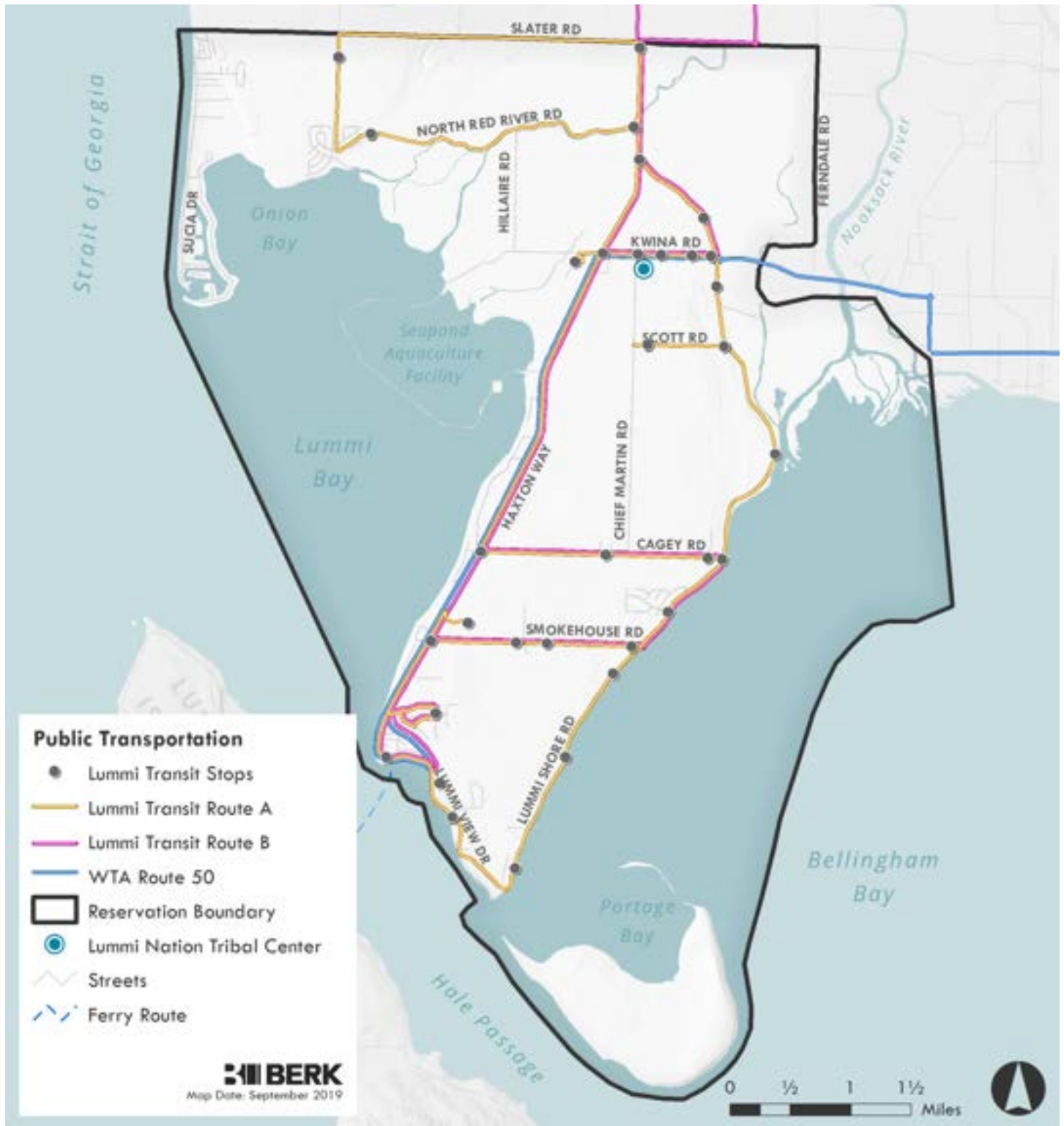
The Lummi Nation is served by two Lummi Transit bus routes, one Whatcom Transit Authority (WTA) bus route, and WTA VanPool service. Transit service is not frequent. Lummi Transit Route A runs approximately every two hours on weekdays, connecting areas such as the Fisherman's Cove, the Lummi Administration Center, and the Silver Reef Casino Resort. Route B runs four routes per weekday, connecting the residential Kwina neighborhood to the Silver Reef Casino Resort and north to the City of Ferndale. The Whatcom Route 50 connects Gooseberry Point and NWIC, continuing east to Bellingham. Service runs every hour and forty minutes, 6am to 8pm. WTA also operates a VanPool service. This flexible service is available 24 hours and allows groups of five or more coworkers to commute together, paying on a per-mile basis. These services provide mobility and access too opportunity for residents without cars.² See **Exhibit 8-2**.

Pedestrian Network

Add supporting text? See **Exhibit 8-3**.

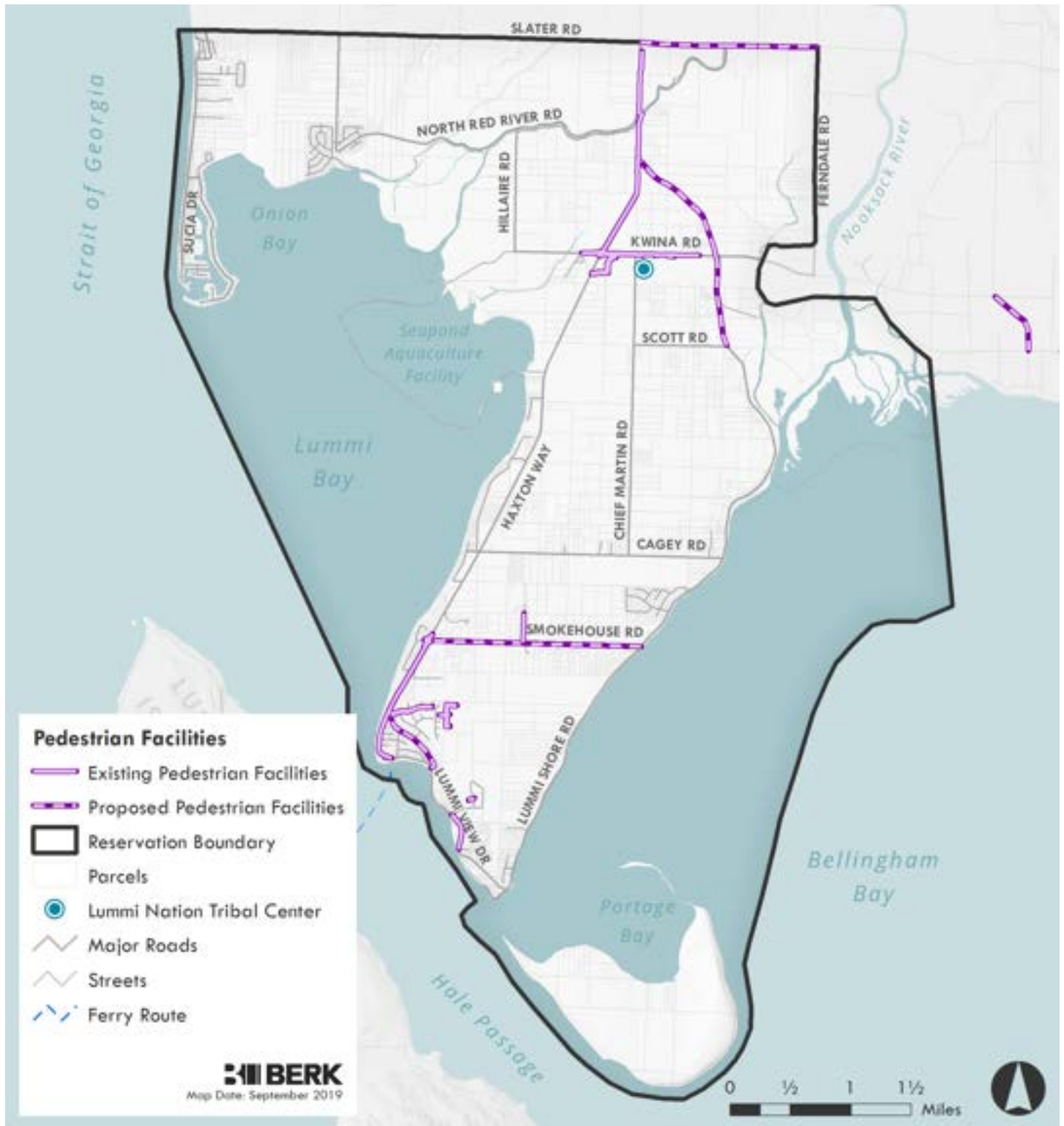
² Lummi Nation Long Range Transportation Plan 2019, Gibson Traffic Consultants.

Exhibit 8-2. Transit Network, 2019



Sources: Lummi Nation Long Range Transportation Plan, Gibson Traffic Consultants, 2019; BERK 2019.

Exhibit 8-3. Pedestrian Network, 2019



Sources: Lummi Nation Long Range Transportation Plan, Gibson Traffic Consultants, 2019; BERK 2019.



Exhibit 8-4. Potential Dock Locations for Gooseberry Point Ferry

Source: Gooseberry Point Ferry Dock Relocation Feasibility Study, 2015.

THE LUMMI ISLAND FERRY

Whatcom County operates ferry service between Lummi Island and Gooseberry Point.

- In 2018 the ferry made 12,523 trips transporting over 200,000 passengers
- Ridership increased 13% from 2015-2018
- Ferry service operates 365 days a year and for Lummi Island residents may be the only link between their home and the mainland

Ferry

Whatcom County operates the Lummi Island ferry service at Gooseberry Point. Most ferry users travel to and from outside the Lummi Reservation. Ferry riders use Haxton Way and Kwina Road/Marine Drive as the primary routes to and from the terminal. The ferry operates from 6 AM to 12 midnight at 20-minute intervals with 40-to-60-minute breaks throughout the day. Ferry use peaks in the summer months and drops precipitously in September.

Whatcom County recently completed an alternatives analysis that looked at modernizing the existing vessel and improvements to and relocation of the Gooseberry Point Ferry Terminal.³ The preferred site in the study is directly adjacent to the current site, labeled in Exhibit 9 4 as "West of Existing Dock".⁴

Heavy, fast traffic on Haxton Way as ferry users queue or rush to the ferry is a safety hazard.

³ Lummi Island Ferry System Level of Service Alternatives Analysis, June 2018.

⁴ Lummi Nation Long Range Transportation Plan 2019, Gibson Traffic Consultants.

*The Lummi Island Ferry.
Photo Credit: Edmund
Lowe Photography.*



Challenges & Opportunities

- **Gaps in the pedestrian network affect continuity and connectivity.** A Pedestrian Masterplan could outline a long-term vision for a connected, safe pedestrian network throughout the Lummi Nation.
- **Public transportation provides important connections but offers limited service.** Expanded hours of service and increased frequency on fixed route services would improve the rider experience. Additional flexible services and first- or last-mile solutions would enhance mobility across the Reservation.
- **Pedestrian comfort and safety is challenging due to the design and geometric configuration of roads.** Capital projects expanding and improving the pedestrian network are underway and need continued attention for safety improvement.
- **The ferry terminal needs additional capacity to meet estimated growth in ridership and need for increased mobility.** Investments to expand the capacity of the terminal has been proposed by Whatcom County and if adopted, could address congestion issues related to the ferry terminal.

Our Plan

The safe travel of all people on the Lummi Nation Reservation is the most important goal of any transportation plan implemented by the Tribe. The goals and policies outlined in this Plan emphasize mobility that is safe and convenient for all users.

- Destinations are well connected via multimodal transportation networks.
- Accident reports are regularly monitored to identify problematic intersections and areas for improved infrastructure.
- Public transit options are convenient and serve the needs of the community.
- Gooseberry Point, with its Ferry Terminal connection, serves as a thriving hub of activity in the community.

Goals & Policies

Goal T-1: The Lummi Nation transportation network supports and reinforces the land use, urban design, economic development, environmental, and community health goals of the Community Plan

Policy T-1.1: Build a complete and connected transportation network for the Reservation.

Policy T-1.2: Policy T-1.2: Maintain the existing street network and seek opportunities to expand the network.

Goal T-2: Lummi Nation residents have access to a robust public transit system.

Policy T-2.1: Enhance transit service and attractiveness by improving frequency of service.

Policy T-2.2: Ensure that transit effectively links key Reservation and regional destinations.

Policy T-2.3: Public transportation system is accessible for residents with disabilities, older adults, and young children.

SAFETY & WALKABILITY

Transportation agencies, both in the United States and internationally, are shifting their focus from auto-centric planning to programs that promote health and safety for active transportation modes.

- **Vision Zero** is a set of strategies aimed toward the goal of eliminating traffic fatalities. Programs have been adopted by major cities and smaller communities alike. Implementation involves speed limit reductions, enhanced enforcement, and pedestrian infrastructure improvements.
- **Safe Routes to School (SRTS)** programs establish active transportation routes in neighborhoods connecting homes to schools. By combining public health goals with traffic calming and safety initiatives, this program leverages federal dollars for walking and biking paths. Tribal communities from California, alongside state Department of Public Health officials, produced a on ways that Reservations can benefit from SRTS funding.

Goal T-3: A comprehensive, integrated trail and sidewalk system improves non-motorized connectivity among the Reservation's neighborhoods, and to the region.

Policy T-3.1: Create a Pedestrian Masterplan to achieve this Plan's vision of the Lummi Nation as a walkable and accessible place.

Policy T-3.2: Create a high-quality trail and sidewalk network that connects important destinations, places, and services people use daily including job centers, commercial and cultural nodes, schools, and parks.

Policy T-3.3: Work with Whatcom Transit to ensure that walking can be seamlessly combined with transit for longer trips, including regional trips.

Policy T-3.4: Work with Whatcom Transit to improve transit stops by providing seating, wayfinding, and trip planning information.

Policy T-3.5: Coordinate with the Lummi Nation School to improve pedestrian connections to school properties and school bus stops.

Policy T-3.6: Create and enhance connections to regional trails and neighboring communities.

Policy T-3.7: Partner with public and private stakeholders to leverage resources and implement projects, programs and activities that increase the reach and effectiveness of the trail and sidewalk network.

Goal T-4: The Lummi Nation is walkable, safe, comfortable, and accessible to all users.

Policy T-4.1: Link tribal residents to regional and local destinations through low stress routes that are safe and enjoyable for users regardless of age, income, physical ability, or trip purpose.

Policy T-4.2: Follow guidelines for design of facilities to ensure universal access, especially for differently abled users.

Policy T-4.3: Improve safety at trail and road crossings.

Policy T-4.4: Promote design and maintenance practices that deter crime including appropriate visibility and comfort through lighting, proper placement of plantings, access control, and other techniques.

Policy T-4.5: Partner with the Lummi Nation Police Department on enforcement to improve safety.



*Safe streets
noon walk.*

Goal T-5: The transportation system is built and maintained to ensure a consistent experience for all users.

Policy T-5.1: Conduct regular maintenance of the network and facilities to offer a predictable, consistent experience for all users.

Policy T-5.2: Adopt Vision Zero policies to promote safe, efficient, and inviting streets.

Policy T-5.3: Ensure the Lummi Nations codes and standards advance the implementation of the Pedestrian Masterplan as public infrastructure is implemented as development occurs.

Policy T-5.4: Develop a funding strategy that takes advantage of all available resources for trail and sidewalk development and improvement.

Policy T-5.5: Prioritize capital projects based on their ability to advance:

- Connectivity and accessibility
- Equity of access for all users
- Safety and trail experience
- Economy and community
- Construction and implementation

Goal T-6: A vision for the Gooseberry Point Ferry Terminal area transforms this transportation hub into a community asset.

Policy T-6.1: Develop a masterplan for Gooseberry Point that addresses land use and mobility, especially in the area around the Ferry Terminal.

Policy T-6.2: Coordinate with Whatcom County on improvements to the ferry terminal and expected impact on roadways.

Exhibit 8-5. Transportation Action Plan

Implementation Action	Responsibility
Goal T-1: Transportation network	
Complete the planned road improvement projects.	Transportation, Public Works
Implement system for easy reporting of road maintenance issues, such as a 311 hotline or online maintenance request form	Transportation, Public Works
Identify funding opportunities for projects that enhance connectivity within and between residential villages, job centers, and public amenities.	Transportation, Planning
Goal T-2: Public transit.	
Extend hours of service and increase frequency on existing public transportation lines.	Transportation
Explore first- and last-mile solutions for access to fixed route service.	Transportation
Expand access to regional job centers through innovative on-demand transit services, such as VanPool.	Transportation
Goal T-3: Trails and sidewalks.	
*Create Pedestrian Master Plan. Identify missing links in the existing pedestrian network to connect important destinations and complete routes.	Transportation, Planning
*Establish a Safe Routes to Schools program to improve pedestrian safety and encourage active transportation.	Transportation, Planning
*Collaborate with Whatcom County on the development of the regional trail system including the trails through Renton.	Transportation, Intergovernmental Affairs
Goal T-4: Safety and accessibility.	
Design the Pedestrian Master Plan to minimize conflicts, street crossings, and travel along high speed, high traffic streets.	Transportation, Planning
*Reduce speed limits to meet safety guidelines from Vision Zero. On Haxton Way, reduce 50 mph speeds to 35-45 mph, more consistent with the rest of the corridor. Kwina Road speed limit reduced to 25-30 mph to acknowledge new residential and mixed-use developments.	Transportation, Police Department
Incorporate automated speeding enforcement to promote safe, efficient, and inviting streets for all users.	Police Department
*Promote pedestrian safety, especially on shared roadways, by increasing awareness among the driving public.	Transportation, Police Department

*Policy Connections:
Economic Development*

*Policy Connections:
Land Use*

*Policy Connections:
Justice & Safety*

*Policy Connections:
Parks & Public Spaces*

*Policy Connections:
Justice & Safety*

*Policy Connections:
Justice & Safety*



Kwina Mile, 2014.

Implementation Action	Responsibility
Goal T-5: Infrastructure.	
*Improve and expand the trail and sidewalk network through new construction, expansion, replacement, maintenance, or repair.	Transportation, Public Works
Offer flexible incentives and tools to make progress towards ultimate system design for the Pedestrian Master Plan.	Transportation, Planning
Goal T-6: Gooseberry Point Terminal.	
*Use feasibility study to advocate for highest and best use at Fisherman's Cove and Gooseberry Point in negotiations with Whatcom County.	Transportation, Intergovernmental Affairs
*Pursue relocation of ferry terminal and harbor redevelopment, prioritizing the needs of Lummi Island residents, traffic safety, and long-term mobility benefits for the community.	Transportation, Planning
*Improve the marine infrastructure at Gooseberry Point, including modernization of boat launching facilities.	Planning, Lummi Economic Development Division

Policy Connections:
Economic Development 



9 PARKS & PUBLIC SPACES

Purpose

This element addresses the parks and recreation needs of the Lummi Nation community including active parks and trails, community recreation facilities, and environmentally and culturally significant open space assets. It is based on the Lummi Nation Parks, Recreation, and Open Space (PROS) Plan.

This chapter includes:

- Parks and recreation conditions and trends including parks facilities, recreation programs, and the regional context.
- Challenges and opportunities including deficiencies in existing recreation and demand for future facilities.
- Parks and recreation strategic plans for improved and new facilities, minimum park standards, and funding
- Portage island management plan

SUMMARY OF EXISTING CONDITIONS & NEEDS

- The Lummi Nation has ample open space lands, but there is a deficit in active neighborhood and community parks.
- Improvement of existing facilities, e.g. adding lighting to track and field sites, could increase services to the community.
- Based on expected Lummi community growth, there is a need to add facilities.
- The Lummi Nation has implemented its plans to add a Community Park and ballfields near the casino.
- There is no one LIBC department that coordinates recreation facilities and activities.
- Additional funding and partnerships are needed to meet the community needs.

Issues & Trends

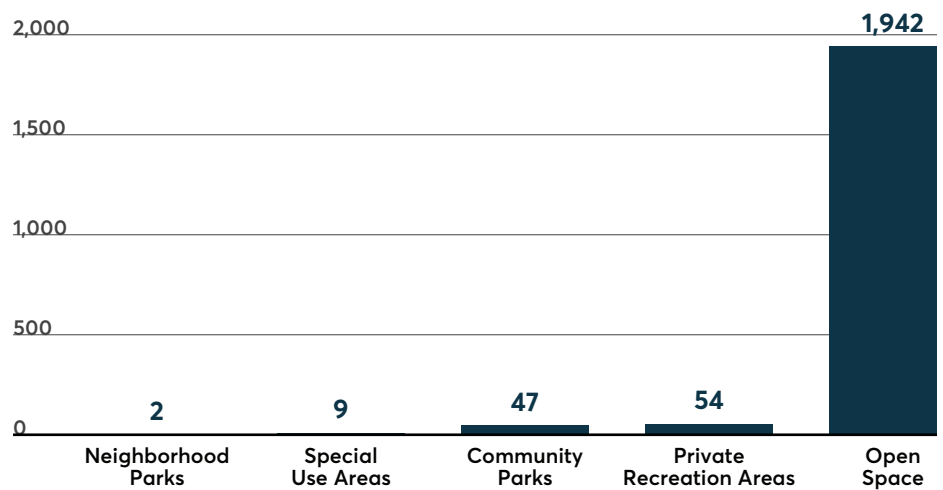
Conditions & Trends

Parks Facilities

The Lummi Nation reservation contains land dedicated primarily to open space and a lesser amount to parks meant for active recreation. See **Exhibit 9-1**.

Exhibit 9-1. Park Classifications and Acreage

Sources: LIBC Resolution 2016-155; My Ferndale News, 2019.



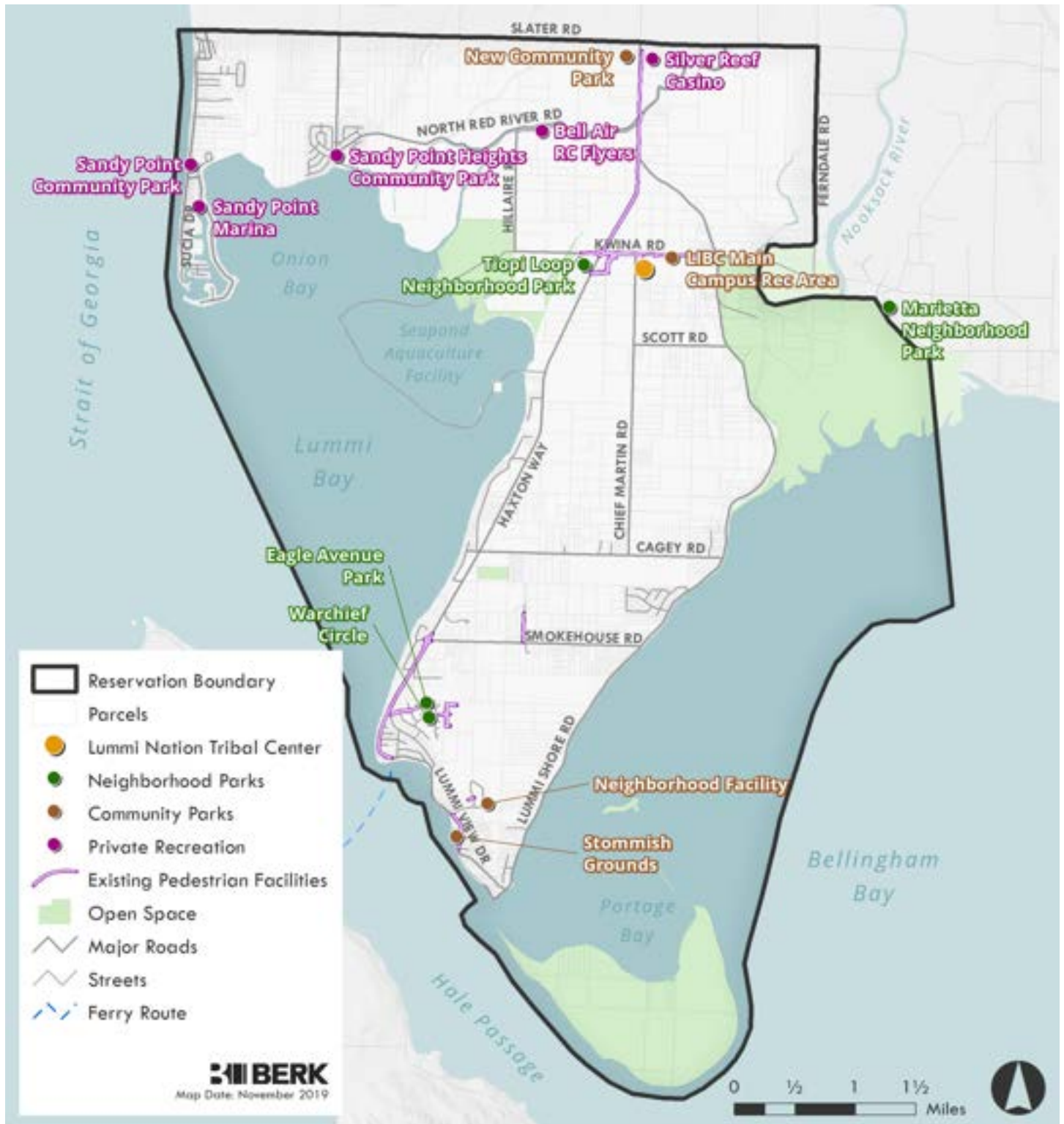
Neighborhood Parks

There are four neighborhood parks that total about 2.17 acres, each with playgrounds or tot lots. Two have half-court basketball courts, and one has picnic facilities. Two are located near Gooseberry Point, one near Kwina Road, and one just off the reservation in Marietta (see **Exhibit 9-2**). Photos of playgrounds at two Neighborhood Parks are provided below.

Neighborhood parks: Warchief Circle Park (left) and Tiopi Loop Park (right).



Exhibit 9-2. Parks, Recreation, and Open Space Inventory Map



Sources: Lummi Nation, 2019; BERK, 2019.

Community Parks

Community Parks tend to be larger and include more intensive family activity and sports facilities. Three sites are developed as community parks, and one is funded to be developed. All four sites are located on the Inventory Map (**Exhibit 9-2**).

A new Community Park is planned west of the Silver Reef Casino Resort on a 37-acre property. See the master plan in **Exhibit 9-3**. The first phase will develop 7 acres of the 37-acre site and add two multipurpose fields out of four on the north side of the site. It will also have a paved trail. The park will be funded with a combination of Lummi Nation funds and grants, including a \$350,000 Youth Athletic Facilities State of Washington Recreation Conservation Office grant was awarded for Phase I.

Exhibit 9-3. New Community Park

Source: My Ferndale News, 2019.



Private Recreation

There are private recreation facilities within the reservation that require membership or personal funds to access. These are shown on the Inventory map (**Exhibit 9-2**).



Mitigation
bank shore.

Trails

There is one public trail on the reservation around one-third mile in length, running along the eastern section of Kwina Road. There is also a lengthier pedestrian path connecting the Silver Reef Casino Resort to Kwina Road. This section has a dedicated right-of-way and quarter mile elevated boardwalk over wetlands. It is fully paved and solar illuminated. These are identified as pedestrian facilities in **Exhibit 9-2**.

Open Space Lands

The Lummi Nation has zoned 19% of the reservation as Open Space, for the purposes of preservation, conservation and restoration of environmentally and culturally sensitive areas and for low impact, outdoor recreational uses, including:

- Lummi River floodplain and delta at Lummi Bay
- Nooksack River floodplain and delta at Bellingham Bay
- Portage Island

Two deltas contain wetland restoration and mitigation banking projects. Portage Island contains bald eagle habitat, and its shorelines host sea lions, seals, and other shorebirds and marine life. Portage Island is culturally significant for the Lummi Nation. See **Exhibit 9-2**.

Special Use Areas

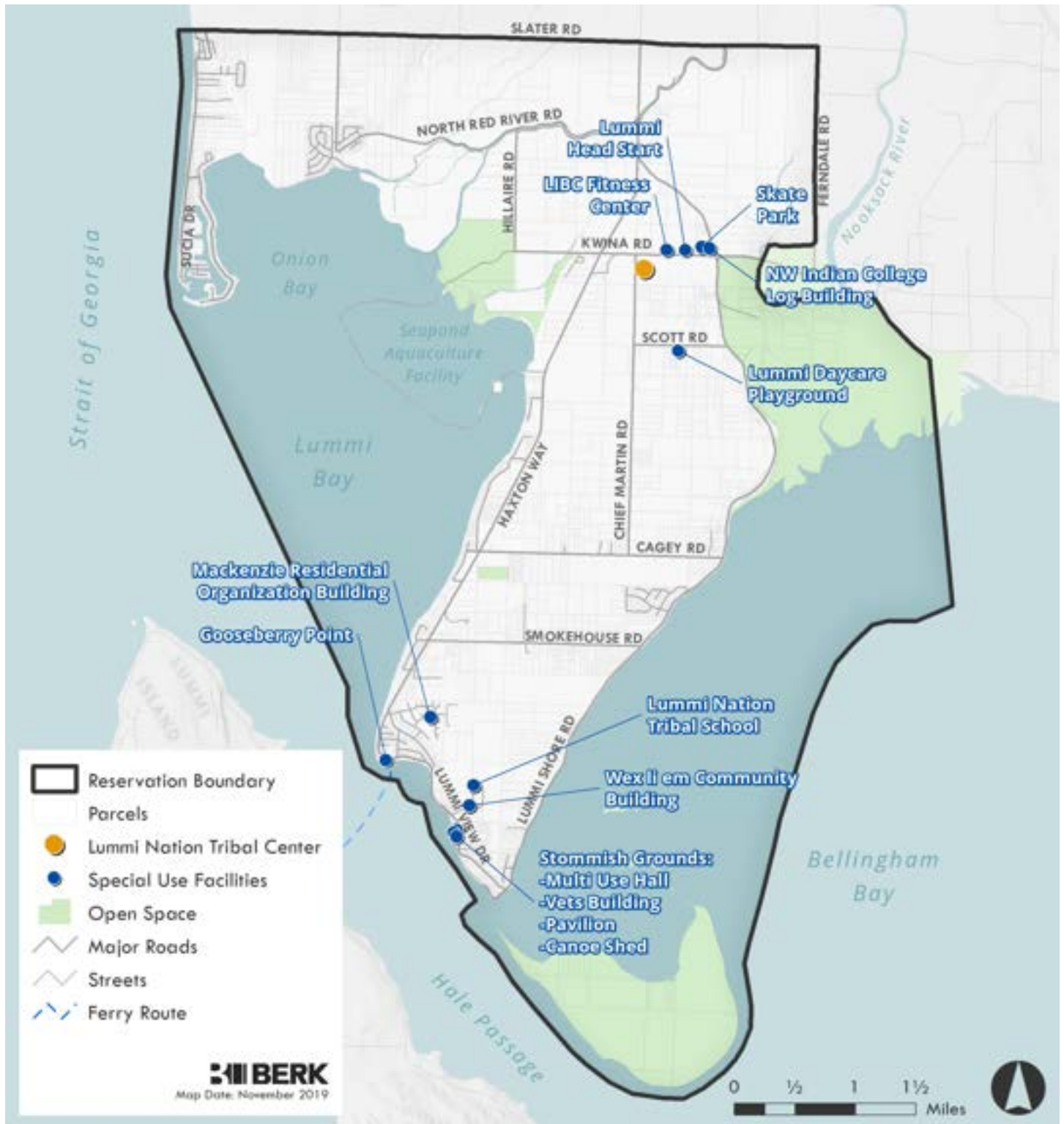
Special Use sites are educational facilities with recreation facilities, clubs or centers for members, or community facilities used for gatherings or ceremonies. Many of these are identified on **Exhibit 9-5** and a full list can be found in **Exhibit 9-4**.

Exhibit 9-4. Special Use Areas

Facility	Description	Acres
Lummi Nation Tribal School	Two elementary playgrounds	1.06
Lummi Head Start/Sadie Jones Good Neighbor Park	Playground/tot-lot	0.61
Lummi Daycare Playground	Playground and tot-lot	0.04
Mackenzie Residential Organization Building (ROC)	Residential Facility which coordinates an after-school program for neighborhood youth and hosts community-wide events.	Unknown
Stommish Hall	Facility used for meetings, dances, concessions and community-wide events.	0.11 (4,976 sq. ft.)
Stommish Vets Building	Facility used for meetings and community-wide events	0.01(566 sq. ft.)
Stommish Pavilion	Facility used for bone games and other cultural and community events	0.05 (2,000 sq. ft.)
Stommish Canoe Shed	Houses War Canoes for Lummi War Canoe Clubs	0.08 (3,521 sq. ft.)
Wex li em Community Building	Community and ceremonial facility	0.39 (16,893 sq. ft.)
Northwest Indian College Log Building	Facility used for meetings, dances and college and community-wide events.	0.06 (2,672 sq. ft.)
Lummi Fitness Center	Known as Wellness Center, membership required	0.11 (5,000 sq. ft.)
Gooseberry Point Marina	Commercial fishing and recreational boating facilities	6.0
Total		8.52

Sources: LIBC Resolution 2016-155; Lummi Planning Department, 2016.

Exhibit 9-5. Lummi Reservation Special Use Facilities



Note: Similar to Community, Neighborhood, and Privately-Owned Parks, the Special Use Areas and Sports Facilities on the Reservation are clustered on the Southern end of the peninsula and along Kwina road to the north.

Sources: Lummi Nation, 2019; BERK, 2019.

Lummi Nation School track and football field.
Source: LIBC Resolution 2016-155.



Sports Facilities

The Sports Facilities are found on some of the Neighborhood or Community Parks or schools. As described under Community Parks, new ballfields are planned at a site across from the Silver Reef Casino Resort. Sports facilities are listed in **Exhibit 9-6**.

Exhibit 9-6. Sports Facilities

Facility	Description	Total
Baseball Fields	One multi-use field at the Neighborhood Facility (F), one standard baseball field at the Lummi Nation School (LNS), two abandoned ball-fields at the Haxton Way Ball-field Complex (HBC).	Baseball standard: 1 Ballfields unused: 2 See multiuse
Softball Fields	One multi-use field at the Neighborhood Facility (F), one standard softball field at the Lummi Nation School (LNS), two abandoned ball-fields at the Haxton Way Ball-field Complex (HBC).	See baseball above.
Football Fields	One multi-use field at the Neighborhood Facility (F), one standard football field at the Lummi Nation School (LNS).	Football standard: 1 See multiuse
Track	One standard track (unfinished surface) at the Lummi Nation School (LNS).	Track: 1
Gymnasium	One standard gymnasium at the Neighborhood Facility (F), one standard gymnasium and one multi-use gym with half-court at Lummi Nation School (LNS).	Gyms: 2.5
Tennis Court	On standard tennis court at the LIBC Main Campus	Tennis: 1
Soccer Field	None specifically dedicated to soccer	Soccer: 0
Swimming Pool	No Swimming Pool at this time	Swimming Pool: 0
Multi Use Field	Neighborhood Facility, Stommish Grounds	Multiuse: 1

Sources: LIBC Resolution 2016-155; Lummi Planning Department, 2016.



2016 1B boys tri-district basketball tournament.

Recreation Programs

Recreation programs are oriented to children as well as families and provides athletic, educational, and social opportunities.

- **Lummi Wellness Youth Recreation Gym, Kwina Road.** Coordinates a variety of youth activities on the reservation including sport's teams in partnership with the Lummi Nation School and the Boys and Girls Club of Whatcom County. The sport's teams include football, basketball, baseball, soccer, and canoe clubs. Activities hosted by Youth Rec include dances, carnivals and fundraisers throughout the year. They also have a cultural program, which works with the youth to plan traditional ceremonies and teaches traditional arts and crafts such as basket weaving, beading, drum making, and carving.
- **Lummi Boys & Girls Club, N Nugent Road, Makenzie Gym.** Since December 2017, the Boys & Girls Club of Lummi Nation has provided services to the Lummi Nation children. Offerings include an after school program for homework assistance, crafts and games, and day camps during winter, spring, and summer breaks. Other activities include teen nights with an open gym, music, and movies.
- **Lummi Nation School.** The school hosts an athletic program for grades 8-12 which includes sports such as football, basketball, volleyball, baseball, and track and cross- country.

PeeWee Blackhawks.



- **Lummi Fitness Center.** The center is the largest indoor recreational facilities on the reservation. The Center includes an aerobics room, weight and exercise room, a men and women’s locker room, each with its own sauna, and a café, which specializes in coffee, drinks, and healthy foods. The fitness center also manages the tennis court, pickle ball court, and half basketball court located in the Southwestern corner of the LIBC main campus. The Lummi Fitness Center offers free gym membership and classes to all enrolled tribal members, other natives eligible for health service at the Lummi Tribal Health Center, and all regular full-time LIBC employees.

Regional Context

Within the Reservation, Whatcom County Parks and Recreation Department owns a 20.3 acre undeveloped property on 3130 Haxton Way called Cagey Way. It is classified as a Special Use property.

Outside the Reservation, the State of Washington Department of Fish and Wildlife owns land abutting the Nooksack delta open space.

*Mother's Day
canoe races, 2015.*



First Salmon Ceremony, 2011.

Challenges & Opportunities

- **Existing recreation programs and services are missing a few key elements.** The Lummi Nation Parks Plan developed in 2016 identified four concerns in parks and recreation. Despite the wide range of recreation activities offered by various Lummi Indian Business Council (LIBC) departments, deficiencies in existing recreation programs and services on the Lummi Reservation remain, including:
 - Lack of centralized control of all existing park and recreation facilities
 - Substandard Maintenance/Rehabilitation of existing facilities
 - No advocate for future parks and recreation facilities
 - Competing or redundant services and facilities
- **Current facilities will not meet future population demands, and levels of service could decrease for residents.** The Lummi Nation projects a total population of 12,200 tribal members and their non-enrolled family members people by 2035. Today there are about 3,879 tribal members living in Whatcom County including on the Reservation. The current population both in Whatcom County and outside totals approximately 5,500 tribal members.

Currently, the Lummi Nation has sufficient total open space and park acres and total open space acres to meet the adopted level of service, but the Lummi Nation has insufficient developed active acres for Neighborhood or Community Parks and trails. There are sufficient ballfields if counting two unused/unmaintained facilities but a deficiency if not including those. There are insufficient soccer fields. The track and football fields meet the Nation’s levels of service though they are unlit and not able to be used at night.

The four multi-use fields at the pending Community Park west of the Casino will help the Nation meet its needs for both ballfields and soccer fields. The site can also accommodate trails to some degree, but the Lummi Nation also intends to provide additional off-street paths to improve connectivity and safety. See **Exhibit 9-7**.

Exhibit 9-7. Parks, Recreation, and Trails Demand

Type	Level of Service	Existing Facilities	Existing Rate	Future Need	Net Need
Parks and Trails					
Total Park and Open Space Land	34.45 acres / 1,000 population	1,999.1	515.4	420.3	(1,578.8)
Open Space	10 acres /1,000 residents	1,941.7	500.6	122	(1,819.7)
Neighborhood Parks	1-2 acres / 1,000 population	2.17	0.6	12.2	10.0
Community Parks	5-8 acres / 1,000 population	46.7	12.0	61	14.3
Special Use Areas	No standard	8.5	2.2	0	(8.52)
Trails	0.50 miles walking and biking trails / 1,000 residents	2.56	0.66	6.1	3.54
Facilities					
Baseball Field	1 field / 5,000 population	3 (inc. unused)	0.8	2.44	(0.56)
Football Field	1 field / 20,000 population	1	0.26	0.61	(0.39)
Track	1 track / 20,000 population	1	0.26	0.61	(0.39)
Basketball Courts	1 court / 10,000 population	2.5	0.64	1.22	(1.28)
Tennis/ Pickle-ball Courts	1 court / 2,000 population	1	0.26	6.10	5.10
Soccer Fields	1 field per 10,000 persons	1 (multiuse)	0.26	1.22	0.22
Swimming Pools	1 indoor pool/20,000 persons	0	0	0.61	0.61

Sources: LIBC Resolution 2016-155, BERK, 2019.

Canoes at the Paddle to Lummi Event.
Photo credit: Ryan Dawson.



Our Plan

Parks and Recreation Strategic Action Plan

Creation of a Parks & Recreation Department

The Lummi Nation Parks, Recreation and Open Space (PROS) Plan and this Element propose the creation of a Parks and Recreation Department of the Lummi Indian Business Council (LIBC). Its purpose would be to:

- Oversee and maintain existing parks and recreation facilities on the Lummi Reservation.
- Advocate for future acquisition and development of parks and recreation facilities.
- Provide parks and recreation services, in coordination with other LIBC departments, for the benefit of all Lummi residents.

Additional detail about its functions are included in the PROS Plan.

Park Classification & Standards

To ensure adequate services to the Lummi Nation community, minimum park size and character standards are included in the **Exhibit 9-8**. These standards will guide acquisition, design, and improvement of parklands.

Exhibit 9-8. Neighborhood and Community Park Standards

Park Classification	Minimum Size	Recreation Features
Neighborhood	2 acres 50% of site is flat and usable and centrally located in service area.	<ul style="list-style-type: none"> Active and passive uses with appropriate selection of recreational facilities, including trails, picnic sites, athletic fields, play equipment, or outdoor courts, and lawn areas. Age-appropriate playgrounds, including separate play areas should for toddlers and older children. Adequate alternatives to automobile access and at least two automobile parking spaces per developed acre. Adequate alternatives to automobile access and parking for vehicles appropriate to park class and expected use. Preserve natural or unique landscapes. Design and plans for an adequate maintenance schedule.
Community	12-to-20 acres At least 50% of the site flat and useable and centrally located in the service area. At least 50 %of the site should be useable for active recreation uses.	<ul style="list-style-type: none"> Select and develop community parks for a broad selection of a, unique characteristic or scenic feature, historic value, location of special use facilities, preservation of natural landscape, or high potential for tribal recreational activities. Acquisition of community parks sites should occur in advance of their actual need and development. Appropriate community parks facilities include: sport's fields for league play, outdoor basketball, volleyball, and tennis courts, open play areas, public restrooms, picnic facilities and shelters, natural open spaces, trail systems, children's playgrounds, and space for outdoor events. Provide at least 3 automobile parking spaces per acre. For ball fields, and events venues, at least 50 parking spaces should be provided, with Americans with Disabilities Act (ADA) compliance. Located on an arterial or collector street. Community parks have considerable maintenance impacts that should be identified and programmed.
Community facilities and/or specialized use areas	Not applicable.	<ul style="list-style-type: none"> Special use areas should be considered in conjunction with park and recreation facilities, neighborhoods, and in the context of community population centers. Since most special use areas are somewhat unique, careful consideration should be given to the potential impacts it may have on the surrounding neighborhoods. Impacts including traffic generation, noise, lighting, intensity of use and impact to the environment should be studied before a decision is made on development. Special use areas often have considerable maintenance impacts that should be identified before a decision is made on development.

Source: LIBC Resolution 2016-155.

Parks & Recreation Facility Plan

The Parks and Recreation Facility Plan is designed to ensure that every reservation neighborhood—and the community, as a whole—are served by adequate parks and recreation. Neighborhood and community parks become

Exhibit 9-9. Proposed Parks and Recreation Facilities

Name	Service Area
Neighborhood Parks	
Smokehouse Village Neighborhood	Serving Smokehouse Road neighborhoods.
Balch Neighborhood	Serving the Haxton Way and Sunset area.
Kwina Neighborhood	Serving the Lummi Shore and Kwina Road area.
Mackenzie Neighborhood	Serving the Gooseberry Point neighborhoods.
Former Alexander Property	Serving the central Lummi Shore and Cagey Road area.
Former Grace Erickson Property	Serving the Neptune Beach and Sucia Drive area.
Community Parks	
Kwina Community Park	A popular and needed component of the Kwina Village Master Plan, serving the central reservation area. Could be located at various locations from Haxton Way to Lummi Shore Road.
Cagey Community Park (Whatcom County Lease)	This landlocked, sloping and forested 20-acre parcel south of Cagey Road and east of Haxton Way is a 75-year lease from Whatcom County expressly for park and recreation use. It would be suitable for passive uses requiring less development. Negotiations with surrounding landowners to gain access would be necessary.
Slater Road Community Park	This site has been master planned and is being phased per Exhibit 9-3 .
Outdoor Fields	
Stommish Grounds Baseball Field	The Stommish Grounds could accommodate a new youth softball field. The use would be shared with seasonal special events. The field would serve the Gooseberry Point and Lummi View neighborhoods.
Sports Field on the former Alexander Property	This clear, but sloping site may be large enough for a youth softball, soccer, or multi-use field in conjunction with the proposed neighborhood park. The field would serve the east-central reservation.
Slater Road Sport's Complex/ Golf Course	This site has been master planned and is being phased per Exhibit 9-3 .

the core of the park system. Other types of recreation facilities, open space, and trail systems will complement the neighborhood and community facilities while simultaneously improving connectivity on the reservation. See **Exhibit 9-9** for a list of proposed parks and recreation facilities.

Planning objectives of the Facility Plan include:

- Plan for additional neighborhood and community parks and facilities in residential neighborhoods and reservation centers.
- Develop an open space system.
- Develop a community-wide recreational trail system.
- Meet the growing demand for sports fields and facilities.

The exact size and boundaries of park facilities will be determined at the time of acquisition/development.

Name	Service Area
Special Use Facilities	
Lummi Fitness Center (Expansion)	To serve a wider range of age groups over the entire reservation—facilities are currently aimed toward adult exercise. Would include additional work out room space, a multi-use gym and equipment and expanded locker room.
Shooting Range	At the former blockhouse site, this unfinished facility needs to be simply, but carefully developed to make it usable and safe. Serves the entire reservation community of hunters and gun enthusiasts.
Stommish Grounds	<ul style="list-style-type: none"> • Serves the entire community • Build a second canoe shed • Install stationary picnic tables • Construct new public restroom facilities • Develop an additional half-basketball court • Install lighting for basketball courts and parking lot
Adult League Ballfields	<ul style="list-style-type: none"> • One-to-four fully developed fields, including lighting and adequate parking have been considered to provide a regional need for adult league softball, soccer, of other field sports. These facilities would be major capital projects and partnered funding is assumed. • Two or three locations in the Slater Road area have potential.
Recreational Marine Facilities	Develop full-service saltwater marine recreational facilities, including boat storage, transient boater services and berthing, supplies and repair, launching and moorage, and fuel docks for the recreational boating public in the region.
Open Space	
Lummi Flats (Expansion)	This is an alluvial floodplain primarily in agriculture use with few other uses besides birdwatching. No development proposed.
Lummi Tidelands	Nearly 200,000 front-feet of tidelands, beaches and riverbanks are reserved only for use by enrolled tribal members, who use them for access to subsistence shellfish harvesting and fishing activities and boat launching, with secondary passive recreation (beach fires, picnics). Non-tribal member access is regulated and limited to permit-required use in three areas: Strait of Georgia, Gooseberry Point, and Hermosa Beach. No development of tidelands is desired or proposed.

Source: LIBC Resolution 2016-155.

Facilities Renovations

Renovations and repair to existing facilities is a high priority. Because no management and maintenance authority with any department has formally existed before now, the responsibility for maintaining safe, usable facilities has lapsed and some facilities are in advanced degrees of disrepair.¹

Funding

The PROS Plan identifies funding sources to accomplish the proposed new and rehabilitated facilities:

- **Grants.** Federal and state.
- **Cost recovery.** Revenue from park operations.
- **Volunteers.** Contributing cash or materials for labor.
- **Work Release Program.** An alternative to jail time by providing community services such as working on a park maintenance crew.
- **Tenant Requirements.** Require quarterly neighborhood clean-ups to include neighborhood parks as a stipulation of rental contract in US HUD neighborhoods. One representative from each household must be present to avoid paying fee.
- **HUD Maintenance.** Require maintenance by HUD maintenance personnel if park is located within HUD neighborhood and constructed with HUD funds.
- **Transfer of Development Rights (TDRs).** A process wherein the development rights of a parcel of desired open space land is transferred to a second parcel of land more suitable for development. The second parcel of land is then permitted a higher level of development.

Portage Island Management Plan

Portage Island (Swe'lisen) is located at the southernmost portion of the Lummi Reservation and is connected to the mainland by a tombolo at low tide. See **Exhibit 9-10**. The island is about 1,000 acres and was occupied by the Lummi Indian Tribe since time immemorial. Portage Island has historical as well as deeply significant cultural value to the Lummi Nation and its members.

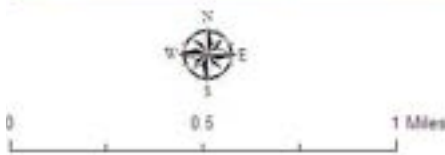
Most of the island was assigned to Lummi tribal members in the 1884 assignment schedule and divided among heirs or sold to non-Lummi in

¹ PROS Plan, 2015.



Exhibit 9-10. Portage Island Aerial

Source: LIBC Resolution 2016-155 .



Lummi Nation GIS Division makes no claim as to the accuracy, completeness, or content of any data contained herein. This map is not intended to reflect the extent of land boundaries of the Lummi Reservation. All warranties of fitness for a particular purpose and of merchantability are hereby disclaimed.

the early 20th Century. In the mid-1960's a large non-tribal subdivision was proposed, threatening the integrity of its cultural significance. Through a coordinated effort between Federal, State, and County government, the island was re-acquired with the intent of establishing a park. In 1981, LIBC purchased all of the parcels on the Island in public ownership from Whatcom County for \$1,190,000 with a grant from the Interagency Committee for Outdoor

Recreation (IAC), currently known as the Washington State Recreation and Conservation Office (RCO). The majority of Portage Island, under the agreement with the State of Washington and the IAC was to be designated for development as a public park with the primary goal of protection, preservation, and enhancement of natural ecosystems and cultural resources, while allowing limited, controlled public access.

A number of deed restrictions complicate the land tenure of Portage Island for use as a public park. Original deeds from landowners who sold portions of Portage Island in the 1960's stated that if the island is not developed and used for public recreation, those property owners would have the right to re-purchase their lands after 50 years. Other deeds from the same time do not include the option for re-purchase. In addition, no use that is inconsistent with the original public park purpose will be allowed on Portage Island unless the Tribe compensates "at least fair market value" with other land suitable for outdoor recreation.

Portage Island remains in LIBC ownership, and the island has remained relatively undisturbed since the 1981 agreement. It is the intention of the Lummi Nation to fulfill its obligation to Washington State and the IAC and designate Portage Island for use as a public park, but that intention is countered by LIBC's high priority to preserve the cultural, historical, and natural heritage of the island for the future generations of the Lummi Nation. It is a real concern of the Tribe and its members that development and use for public recreation will significantly damage or destroy those resources.



View from the Middle Fork.

Goals & Policies

Parks & Recreation

Goal PR-1: A parks, recreation, and open space system tailored to their needs improves and maintains the quality of life for members of the Lummi Nation.

Policy PR-1.1: Actively involve Lummi Nation people in parks, recreation, and open space planning.

Policy PR-1.2: Site and develop parks to provide for a variety of recreational opportunities.

Policy PR-1.3: Re-evaluate parks and recreation facilities and programs regularly in order to ensure appropriate, well-maintained facilities and adequate services.

Goal PR-2: A recreation program providing well-rounded recreation opportunities is available to all Lummi community members, promoting healthy lifestyles, improving self-esteem, and building cultural pride.

Policy PR-2.1: Continue to develop appropriate community-oriented sports and recreation programs that foster participation of all ages and levels of ability.

Policy PR-2.2: Develop sustainable community enrichment programs that are responsive to identified needs and strengthen the community.

Policy PR-2.3: Strive to improve the quality of service in all parks and recreation programs and facilities.

Goal PR-3: Investments to develop and maintain an interconnected reservation-wide network of neighborhood and community parks, recreation facilities, and open space provide both scenic and recreational opportunities, improve safety, preserve sensitive and unique lands, and protect the Nation's natural and cultural resources.

Policy PR-3.1: In major neighborhoods, provide parks and recreation facilities appropriate to the natural and human environment consistent with minimum standards of the PROS Plan. See **Exhibit 9-8**.

Policy PR-3.2: Develop and maintain community parks to serve all residents of the Lummi Nation. See **Exhibit 9-8**.

Policy PR-3.3: Provide community facilities and/or specialized use areas to serve all residents of the Lummi Nation consistent with minimum standards of the PROS Plan. See **Exhibit 9-8**.

Policy PR-3.4: Develop and maintain a system of trails and open spaces linking parks, neighborhoods, and essential goods and services, while promoting multi-modal connectivity throughout the Lummi Reservation and outlying communities of Whatcom County.

Policy PR-3.5: Plan and develop landscaped areas under these principle guidelines:



*Kwina Mile,
2014.*



Alder growing on a log in a mitigation bank.

- Use natural vegetation when possible or plant native or naturalized fast-growing plant materials to provide buffers or screening of views, noise, and activities.
- Street trees, along with provision for their maintenance are required, as part of new developments on arterials routes.

Policy PR-3.6: Work cooperatively with property owners and provide incentives to developers to provide open space linkage and encourage optimum land use and development for open space, under these principle guidelines:

- Preserve existing vegetation to the greatest degree feasible.
- Provide continuous and visually pleasing trails, roadways, shorelines and wildlife corridors.
- Preserve the visual integrity of wooded hillsides by retaining vegetation, minimizing disruption of soils and slopes, maintaining drainage patterns, and encouraging preservation of wildlife habitat.
- Development of drainage areas should be minimal and limited to trail access for passive recreation and nature study.

Goal PR-4: A trail network linking residential areas to primary destinations, encourages walking and biking for recreation and transportation and provides opportunity for enjoyment of nature.

Policy PR-4.1: Develop, manage, and maintain a reservation-wide system of off-road trails and linear open space that promotes multi-modal transportation connectivity on the reservation and Whatcom County.

Policy PR-4.2: Develop a Pedestrian/Bicycle Path Master Plan and strategic plan for development and management of the reservation trail system under these principle guidelines:

- Include collaboration with the public to identify the best locations for trails.
- Collaborate with neighboring jurisdictions to ensure trail connectivity to those communities.
- Include design and maintenance standards for existing and proposed trails.

Goal PR-5: Open space is retained to preserve natural and cultural resources, provide collateral parks and recreational opportunities, and other benefits to the community.

Policy PR-5.1: Open space should serve one or more of the following functions:

- Provide habitat and wetlands preservation to:
 - protect areas with sufficient food, water, and shelter to support the existing flora and fauna, including rare plants or animal species or unique habitat features
 - create a wide diversity or high density of species
 - provide habitat for resident and migrating species
 - provide a continuous biological corridor, or
 - protect a designated wetland
- Create or enhance scenic and aesthetic qualities and their unique geographical or natural features for highly visible locations, provide opportunities for viewing nature, provide a visual or physical buffer, or an adversely impacted area with potential for restoration.
- Provide linkage and public access, including access to and along water bodies and hillsides, to other recreation areas.

Policy PR-5.2: Help the public identify and understand the role and relationship of open space, parks, and recreation with drainage patterns, wildlife habitats, visual enhancement, cultural resource protection, and land use concepts.

Policy PR-5.3: Reinforce the community's sense of pride for the conservation of open space.

Policy PR-5.4: Acquire and conserve open space that is environmentally or culturally sensitive.

Policy PR-5.5: Acquire open space to separate a residential neighborhood from commercial and industrial development.

Goal PR-6: Adequate sports facilities are provided on the Lummi reservation, using standard design guidelines.

Policy PR-6.1: Encourage the rehabilitation and renovation of existing sports fields to make use of lands already dedicated to that purpose.

Policy PR-6.2: Ensure that new facilities are developed according to regulation standards and in accordance with universal design regulations.

UNIVERSAL DESIGN

Universal design is the design of products or environments to be usable by all people, to the greatest extent possible, without the need for adaptation or specialization.

Design Principles include:

1. Equitable Use
2. Flexibility in Use
3. Simple and Intuitive Use
4. Perceptible Information
5. Tolerance for Error
6. Low Physical Effort
7. Size and Space for Approach and Use

—The Center for Universal Design

Paddle to Makah, 2010.



Goal PR-7: The Lummi Nation has improved access to the northern Puget Sound, the saltwater shoreline and freshwater ponds and streams for all Lummi people.

Policy PR-7.1: Require all Non-enrolled tribal members to obtain a permit for any access to the tidelands, subject to the requirements of the Lummi Tidelands Access Policies.

Policy PR-7.2: Improve tidelands access and harvesting opportunities by providing physical access to as much reservation tidelands as possible to maintain shoreline slope stability and tideland ecosystem integrity.

Policy PR-7.3: Enhance access and recreational opportunities at waterfront facilities, including the Stommish Grounds, the boat launch facilities at Gooseberry Point and west of the Stommish Grounds.

Policy PR-7.4: Identify, acquire, restore, and preserve ponds, marshes, streams, drainage courses and ravines, which provide wildlife habitat and are important to reservation hydrology and water retention systems by exploring and considering a variety of funding sources for that purpose.

Policy PR-7.5: Continue to support saltwater marine recreation for tribal members and the public recreational boating community in the region by making improvements to the onshore and shoreline facilities related to boating, fishing and other water-based recreation.

Goal PR-8: An established Parks and Recreation Department oversees all reservation park and recreation facilities and programs.

Policy PR-8.1: Create and operate a Parks and Recreation Department that is coordinated with the recreation programs and school to provide a comprehensive reservation wide program.

Policy PR-8.2: The Plan and subsequent amendments to the Plan shall be the policy document for the Parks and Recreation Department.

Goal PR-9: Acknowledge the value of the Lummi nation's existing parks and recreation facilities by developing capital facilities, rehabilitation and maintenance programs for parks and recreation facilities.

Policy PR-9.1: Follow the recommendations in this Plan and the Parks and Recreation Department to guide future renovation and rehabilitation of existing parks recreation and sports facilities.

Policy PR-9.2: Develop and follow a comprehensive parks and recreation facilities maintenance plan to provide usefulness, safety, and durability.

Policy PR-9.3: Hire, train, and employ landscape maintenance workers to maintain existing parks and recreation facilities and equipment.

Policy PR-9.4: Inspect, repair, and upgrade parks and recreation facilities, as needed, including:

- playground equipment and park furniture to provide safe, accessible playgrounds

*ARCC Fundraiser Hula 5K Run
on the Haxton Way Trail, 2014.*



- parks buildings including community buildings, pavilions, shelters, and restrooms
- drainage and irrigation systems to reduce maintenance and manual operations
- park trees, shrubs, and turfing areas to provide a usable, attractive landscape

Policy PR-9.5: Project both maintenance and replacement costs in a parks and recreation facility maintenance plan.

Policy PR-9.6: Provide appropriate trash receptacles and regular disposal services to reduce littering at recreational sites.

Policy PR-9.7: Develop staff and conduct patrols of recreational facilities, including nighttime to decrease vandalism and littering.

Policy PR-9.8: Organize community volunteer efforts to clean neighborhood and community parks and special use area quarterly.

Goal PR-10: LIBC departments, governmental agencies, non-profit organizations and private business cooperate to provide parks, recreational facilities, open space, and trails.

Policy PR-10.1: facilitate cooperation among LIBC governmental agencies, outside non-profit organizations and private business interests to provide capital financing for parks, recreation facilities, open space, and trails.

Policy PR-10.2: Ensure LIBC departments, agencies, and cooperate with other entities to provide sustainable, effective community recreation programs.

Policy PR-10.3: Amend the Lummi Nation Development Regulations to require the appropriate development of parks and recreation facilities with all new development or contribute towards expansions or improvements at neighborhood and community parks and connecting trails.

Portage Island

Policy Connections:
Natural Environment & Sustainability

Goal PR-11: The natural and cultural heritage of Portage Island is preserved for future generations of the Lummi Nation.

Policy PR-11.1: LIBC shall fulfill its obligations to RCO by classifying Portage Island as Swe'lisen Heritage Park and allow limited public access by select Non-Lummi tribal member groups, including boy and girl scouts, school groups and others, explicitly for educational purposes, subject to the following requirements:

- Groups will be subject to the provisions of the approved Lummi Tidelands Access Policies and Procedures.
- Groups will be required to obtain a permit specific to Portage Island.
- Permit applications must be filled in completely, submitted no less than 72 hours prior to access to Portage Island, and be accompanied by the required fee to be valid.
- Groups will only be allowed to access Portage Island by foot.
- Archeological investigations, collectors, or digging of any kind is absolutely prohibited.
- Access to Portage Island will only be allowed during daylight hours and during low tides of -1.0 or below.
- No more than three (3) Non-Lummi tribal member group visitations per week will be allowed on Portage Island.
- Groups will only be allowed visitation to specific areas of Portage Island. Furthermore, the Lummi Culture Department and Lummi Natural Resources Department will develop a map of the designated visitation areas and/or provide a monitor to accompany groups during visitation to Portage Island.
- Groups will be required to abide by the "pack in – pack out" rule meaning that all belongings and waste taken onto the island must be removed upon leaving.

Policy PR-11.2: The Lummi Culture Department and the Lummi Natural Resources Department shall evaluate Portage Island regularly to ensure that limited access and tribal member access does not affect native flora and fauna and cultural sites and modify access requirements accordingly.

Policy PR-11.3: Direct all collected permit revenue toward activities supporting the management and enforcement of Portage Island limited access.



Portage Island as seen from above in 1956. This uninhabited island remains greatly unchanged, though it is frequently visited by the Lummi People. Photo courtesy Whatcom Museum.

Policy PR-11.4: A public awareness campaign communicates the history and cultural significance of Portage Island to the Lummi Nation.

Policy PR-11.5: Develop an Interpretive/Permit Center for Portage Island and Lummi Tidelands located which functions shall include:

- Permit issuance and fee collection for visitation
- Information and interpretive services about Portage Island and Lummi Tidelands regulations, natural environment, and culture.

Policy PR-11.6: Policy PR-11.6: In partnership with the Lummi Nation School, document the history of Portage Island, assisted by media when possible, with the purpose to educate student and other groups accessing Portage Island about its cultural significance.

Action Plan

Exhibit 9-11 identifies implementation initiatives or strategies related to culture the Tribe is prioritizing to accomplish prior to the next Community Plan Update.

Exhibit 9-11. Parks & Public Spaces Action Plan

Implementation Action	Responsibility
Goal PR-1: A parks, recreation, and open space system tailored to their needs improves and maintains the quality of life for members of the Lummi Nation.	
Maintain a PROS Plan for grant eligibility	Planning Department
Improve existing parks and trails	Planning Department
Increase neighborhood and community parks and trails	Planning Department
Adopt regulations to ensure adequate parks and public spaces as development occurs	Planning Department
Manage Portage Island access	LIBC
Develop Secure Funding	LIBC
Create a Parks and Recreation Department	LIBC

Policy Connections:
Land Use; Transportation;
Health & Wellness

Policy Connections:
Health & Wellness



10 PUBLIC FACILITIES & INFRASTRUCTURE

Purpose

The purpose of this Chapter is to address the utilities and infrastructure assets and needs of the Lummi Nation people. This chapter includes:

- Utilities and infrastructure conditions and trends including water, wastewater, solid waste, stormwater and utilities.
- Challenges and opportunities including deficiencies in existing facilities.

Issues & Trends

Conditions & Trends

Water & Wastewater

Water and Wastewater service on the Lummi Reservation is provided by the Lummi Tribal Sewer & Water Districts (LTSWD). The LTSWD were originally established in 1976 as a component of the Lummi Nation. The construction of the sewer system began in 1983 and the District is the sole provider of

sewer service to approximately 1,600 connections within the Lummi Nation. The installation of the water system began in the mid 1960's with the vision and leadership of several tribal members and grants from the Indian Health Service. It currently serves approximately 1,100 connections primarily on the Lummi Peninsula. The District derives its authority and rules of operation from the Lummi Code of Laws Chapter 17 "Sewer and Water District Code". See **Exhibit 10-1** and **Exhibit 10-2** for the extent of the water distribution and sewer collection system. There are currently eight non-tribal water associations serving predominantly non-tribal members in residential areas along the Reservation shorelines. These systems are entirely dependent on wells adjacent to or within the association boundaries and provide service to roughly 850 homes.

The District operates three separate wastewater systems under permits from the Environmental Protection Agency. The Sandy Point system serves the northwest area of the reservation including Sandy Point, Neptune Beach and Sandy Point Heights. The Kwina Road system serves the Kwina Road area and all services to the north. The Gooseberry Point system serves the Gooseberry Peninsula south of Kwina Road. Overall the system contains 60,000 feet of pressure sewers and 59,000 feet of gravity sewers for a total of 119,000 feet of pipe. A total of 29 sewage-pumping stations are required to pump the wastewater to the treatment plants.

The District operates one water system for the entire reservation. The primary source of water is from wells, but the District also maintains a connection with the City of Bellingham that is used when groundwater supplies cannot meet the needs of the community. The District contains approximately 217,500 feet of water pipeline, 10 wells, 4 reservoirs, 184 fire hydrants, over 1,000 water meters, and 56 water quality sampling sites.

Solid Waste

Landfills are specifically prohibited within Reservation boundaries. Most Lummi residents sign service agreements with private collection agencies for solid waste and recycling disposal. According to the Comprehensive Land Use Plan, an estimated 300 households do not contract for curbside collection. Incidents of illegal dumping does occur within the Reservation, resulting in negative environmental impacts.

Stormwater

All water that falls onto or passes through the Lummi Reservation discharges into the tidelands and/or estuaries directly or via a creek or wetland or infiltrates into the underlying aquifer. The Natural Resources Conservation Service (NRCS) Web soil survey classifies the majority of the reservation lands as various types of silt loam in hydrologic soil groups A-D.

Whatcom County is responsible for maintenance of roadside drainage systems and the Lummi Bay Seawall tide gates. The Lummi Natural Resource Department manages the Seapond Aquaculture Facility tide gates and reviews and proposed water management projects. The Climate Change Mitigation and Adaption Plan: 2016-2026 report acknowledges that under future climate change scenarios, additional and improved stormwater infrastructure will be necessary on the reservation. Rainfall events are expected increase in intensity and temporal distribution with longer drier summers and a more compressed and intense rainy season. Local flooding and erosion is likely under the expected scenario if proper interventions are not in place.

Utilities

The reservation is also served by franchise utilities for power and communications. Puget Sound Energy (PSE) provides electricity to the Reservation. There are also some small solar energy installations across the Reservation. Space heating in homes and other buildings on the Reservation typically uses electricity, propane gas or wood. Natural gas is provided by Cascade Natural Gas (CNG), but utility service is only available to the Silver Reef Hotel, Casino & Spa and the Lummi Mini Mart.

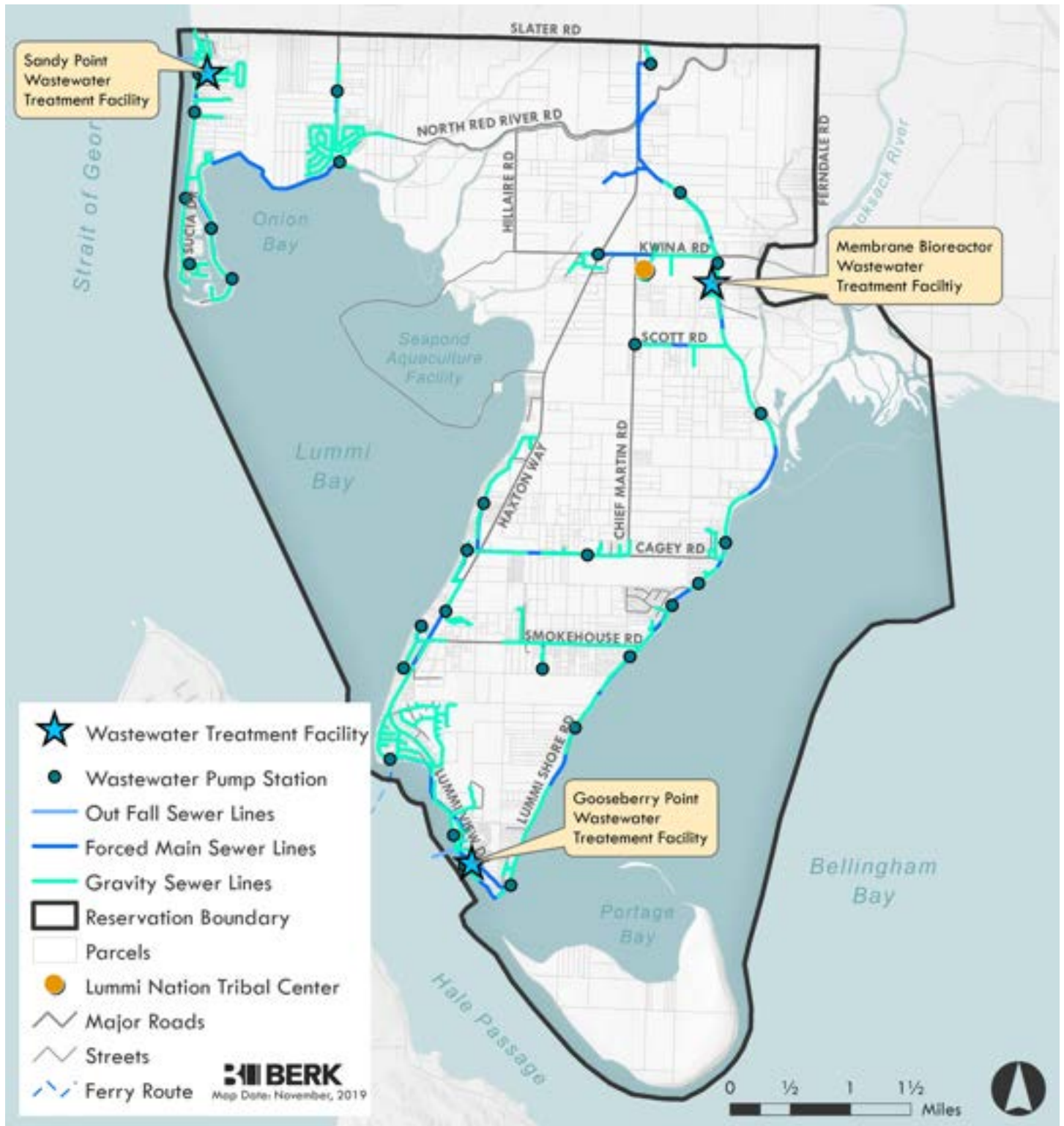
Fire

Three fire districts with primarily volunteer staff provide fire protection and medical aid services on the Reservation. Whatcom County Fire District No. 8 covers the Reservation south of the Lummi River, including the Lummi Peninsula, and has one station (Station No. 5) located at Gooseberry Point. Whatcom County Fire District No. 17 provides fire protection and emergency medical services to the Sandy Point Peninsula and Sandy Point Heights/ Lake Terrell Road areas in the northwest portion of the Reservation. District No. 17 has two stations on the Reservation, one on the Sandy Point Peninsula (Station No. 1) and one at Sandy Point Heights (Station No. 2).



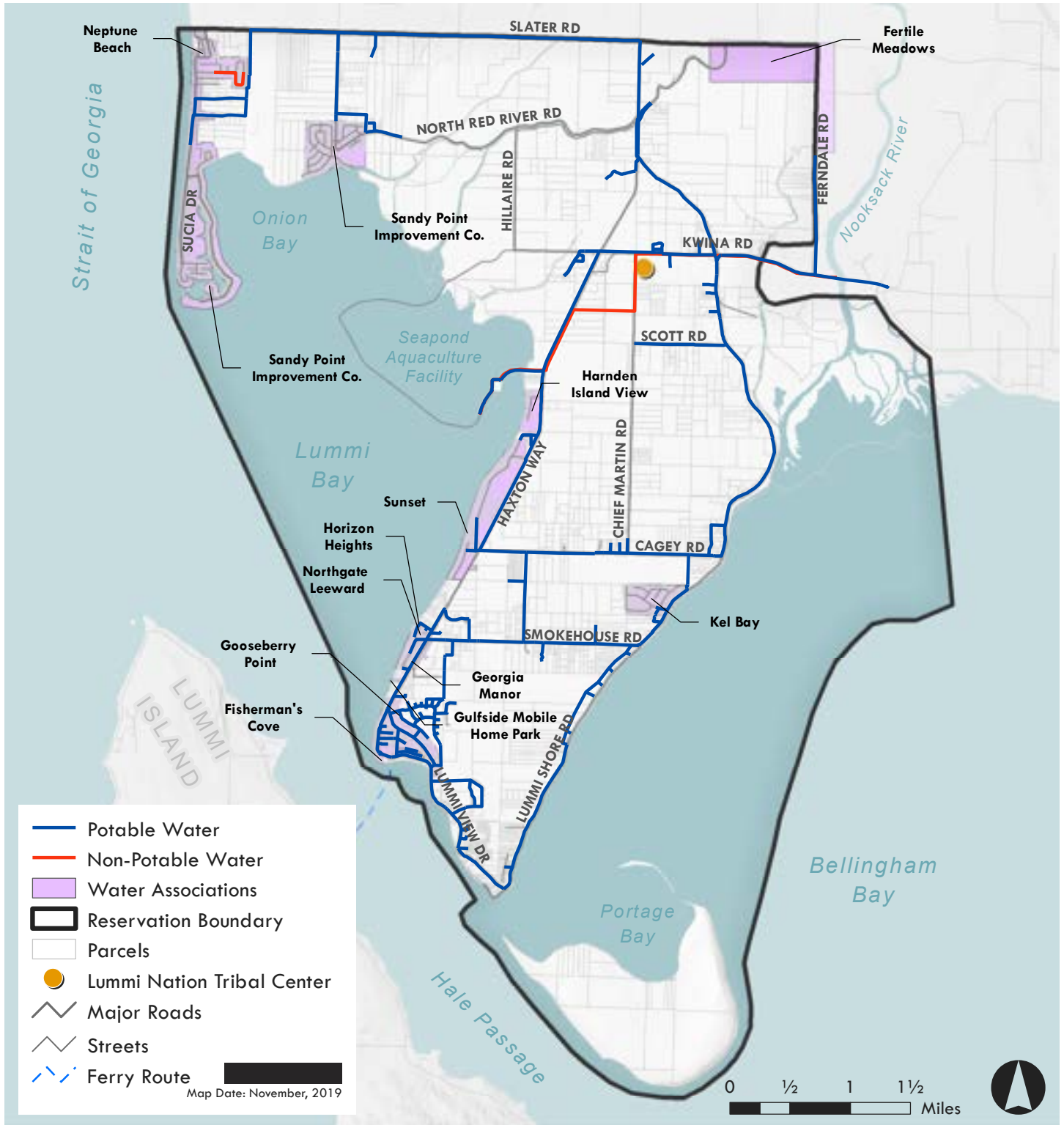
*Whatcom County Fire
District No. 8*

Exhibit 10-1. Lummi Reservation Wastewater Collection and Treatment Facilities



Source: Lummi Nation, 2019; Herrera Environmental, 2019; BERK, 2019.

Exhibit 10-2. Lummi Reservation Water Infrastructure



Source: Lummi Nation, 2019; Herrera Environmental, 2019; BERK, 2019.

Police

The Lummi Nation Police Department provides public safety protection on the Reservation. The Police Department is responsible for enforcement of the Lummi Nation Code of Laws, is the first responder to all emergency calls on the Reservation and is responsible for emergency services on the Reservation in the case of flood, earthquake, or other natural disasters.

Challenges & Opportunities

- **Limited access to freshwater.** Existing shortages of freshwater in the Nooksack River is expected to increase. This would affect development on the Lummi Reservation and availability of a sustainable amount of salmon and shellfish enough to support the Lummi Schelangen.
- **Groundwater is a critical resource for the Lummi Nation.** Most of the residential water supply for the reservation is from groundwater wells. Existing water supply wells are all located within close proximity of marine waters. This proximity can cause wells to be susceptible to salt water intrusion. Illegal dumping of waste and pollution from polluted run-off can affect the quality of the groundwater supply of the Reservation. Climate change can also make this resource vulnerable due to decreased recharge.
- **Some problems exist around wastewater management on the Reservation.** A few homes on the Reservation have not yet been connected to the LTSWD sewer system and rely on on-site septic systems for wastewater management. In the event of floods, poorly designed or maintained septic systems can cause contamination of ground and surface waters.

Our Plan

Investments in utilities and infrastructure support the transition to more compact development patterns.

This strategy allows efficient use of existing investments and infrastructure.

Stormwater management standards are maintained and increased as new development occurs.

While Whatcom County owns several roads and road drains within the Reservation, the Lummi Nation makes investments in the Nation's facilities to support the transition to a sustainable, compact urban form.

Climate resilience drives infrastructure planning.

Energy conservation, and planning and upgrading infrastructure investments and upgrades are the best strategies for the Nation to plan for a climate resilient future.

Goals & Policies

Goal U-1: Utilities are available at the necessary level of service to support the compact, mixed-use nodes of development consistent with the Plan vision.

Policy U-1.1: Ensure that utility service plans prepare and plan for adequate service to new development.

Policy U-1.2: Explore ways to increase the efficiency of solid waste collection services.

Policy U-1.3: Explore opportunities to reduce water demand and improve water use efficiency.

Policy U-1.4: Evaluate the feasibility of water reclamation and reuse.

Goal U-2: The Lummi Nation increases its capacity to manage storm water.

Policy U-2.1: Reduce storm water runoff through continued implementation of the Lummi Nation Storm Water Management Program.

Policy U-2.2: Ensure developers of large projects comply with requirements for site developments that are based on best available science for stormwater site planning and the installation of permanent stormwater controls and construction phase Storm Water Pollution Prevention Plans (SWPPPs) subject to Lummi Natural Resources Department review and approval.

Policy U-2.3: Strategically plan for the retrofitting of the existing tribally owned stormwater collection system to provide enhanced water quality treatment to protect the quality of receiving waters.

Goal U-3: The Lummi Nation plans or upgrades infrastructure to become a climate-resilient community.

Policy U-3.1: Conduct energy audits of tribal facilities and Reservation residences and prioritize the implementation of energy efficiency practices based on the findings of these energy audits.

Policy U-3.2: Explore the use of solar energy, particularly at tribal facilities with demand for electricity and/or water heating that are in appropriate areas and have available roof space for solar installations.

Policy U-3.3: Upgrade stormwater infrastructure to be more resilient to increasing storm intensities and protect property, infrastructure, and natural systems against flooding based on the priorities in the Lummi Nation Multi-Hazard Mitigation Plan (MHMP 2010).

Action Plan

Exhibit 10-3 identifies implementation initiatives or strategies related to culture the Tribe is prioritizing to accomplish prior to the next Community Plan Update.

Exhibit 10-3. Public Facilities & Infrastructure Action Plan

Implementation Action	Responsibility
Goal U-1: Adequate utilities .	
Ensure the water and sewer systems on the reservation are planned to accommodate the growth anticipated in the Plan and ensure a funding plan is in place for these utility improvements.	Lummi Tribal Sewer and Water District
Goal U-2: Efficient utilities.	
Explore water conservation strategies such as providing public education and outreach, installing water efficient fixtures and appliances, preventing and fixing water leaks, and landscaping with native plants and drought-tolerant vegetation.	Lummi Tribal Sewer and Water District
Goal U-3: Manage stormwater.	
Implement Lummi Nation Storm Water Management Program	Natural Resources
Goals U-4: Climate resilience.	
Explore the use of solar panels at Silver Reef Hotel, Casino & Spa, the Lummi Nation School, the Tribal Administration Building, the Lummi Bay Salmon Hatchery, the Shellfish Hatchery, the Skookum Creek Hatchery, Lummi Housing Authority residential developments, and the Gateway Center	Natural Resources, Tribal Gaming Agency



11 YOUTH & EDUCATION

Purpose

This chapter outlines current conditions, challenges, and opportunities to enhance youth and education programming in the Lummi Nation.

This chapter includes:

- Inventory and review of educational institutions on the Lummi Reservation
- Demographics and needs of Lummi youth
- Discussion of workforce development and training programs available for youth and adult students

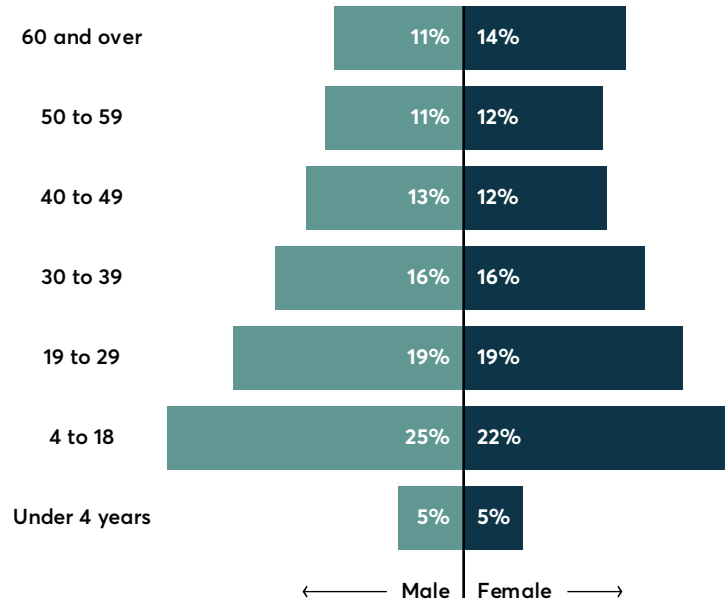
Issues & Trends

Conditions & Trends

Youth (ages 4-18) comprise almost a quarter of the Lummi Nation's population. The education and development of this generation is critical to the future strength of the community. See **Exhibit 11-1**.

Exhibit 11-1. Age Cohorts, Lummi Nation 2018

Sources: Lummi Nation Population Report, 2018; BERK, 2019.



Existing Education Assets

Currently, Lummi Nation schools offer primary, secondary, and higher education which feature culturally specific curriculum alongside academic requirements. The Lummi Nation has a newly constructed Early Learning Center which serves children from infancy through 5 years of age. The Lummi Nation School offers K-12 education to tribal Members and the Northwest Indian College, located within the community, is a higher education institution hosting students from across the country. These community assets offer the benefit of cultivating community and cultural identity through a shared education that incorporates culturally specific curriculum into academic development.

The Northwest Indian College offers accredited bachelor’s degrees in Native Studies Leadership, Tribal Governance & Business Management, Native Environmental Science, and Community Advocates and Responsive Education in Human Service. Additionally, the college hosts seven Associate’s Degree and five Awards of Completion programs. Reduced tuition rates are offered to all tribal members who live on the Reservation.



Lummi Early Learning program.



NWIC Graduation.

Data Trends

American Community Survey and Washington State reporting identify issues of childhood poverty, lower than regional average academic testing scores, and lower rates of educational attainment among adults. Many families are led by single parents or grandparents, which can rely more heavily on assistance from social programs and organized youth activities.

Approximately 15% of family households with children on the Reservation are single parent households. In addition, a large proportion of grandparents, almost 50%, are responsible caregivers for their grandchildren. These single-parent and grandparent households may be in particularly need for wraparound programming for youth inside and outside of school.

Childhood Poverty

American Community Survey estimates show that 28% of Reservation children under the age of 18 are living below the poverty line.

Educational Attainment

Estimates for Reservation residents show that 88% of the adult population have a high school degree and 21% have a bachelor's or higher (**Exhibit 11-2**).

Exhibit 11-2. Educational Attainment

Educational Attainment (population age 25+)	Lummi Nation	Whatcom County	Washington State
High School graduate or higher	88%	92%	91%
Bachelor's degree or higher	21%	34%	35%

Source: American Community Survey S1501 5-Yr Estimates, 2013-2017; BERK, 2019.

School District Performance

Currently, the school district testing scores for Language Arts, Math, and Science fall behind state averages and the neighboring Ferndale school district. 75% of high school students are reported to graduate within four years, but many tribal families report difficulty affording college tuition payments.

Exhibit 11-3. Educational Attainment

Measure	Lummi Nation School	Ferndale School District	State Total
Meeting English Language Arts Goals*	17%	58%	59%
Meeting Math Goals*	6%	43%	49%
Meeting Science Goals*	13%	50%	46%
9th Graders on Track to Graduate	45%	69%	74%
Graduated in 4 Years	75%	86%	81%
Students Regularly Attending	47%	80%	83%
Per Pupil Expenditure	\$10,676	\$13,227	\$12,811

*Meeting goals defined as meeting grade level standards on state administered tests

Source: Office of the Superintendent of Public Instruction, 2019; BERK, 2019.

Community Concerns

Community feedback gathered for the 2010 Community Plan addressed education issues of high student absenteeism, teacher turnover rates, and a desire for incorporating youth training programs on topics like substance use disorder and mental health into schools. Mixed opinions were expressed regarding satisfaction with the curriculum and education provided to tribal members.

During the engagement process for this 2019 plan, themes and concerns echoed those from 2010. Financial resources were identified as a barrier to completing higher education. The community would like to see primary and secondary education scores at or better than nearby school districts. Leadership also expressed a need to develop a Lummi Model to evaluate education and the desire to provide additional access to technology for students.

Challenges & Opportunities

This chapter identifies various challenges regarding youth development and educational opportunities within the Lummi Nation.

- **Lummi people have varied levels of satisfaction with the Lummi Nation's educational resources.** Improvements to teacher retention rates and additional after-school programming could address concerns with the Reservation's youth education system. Metrics to evaluate progress toward community goals can facilitate communication between parents and educators.
- **Many tribal members struggle to afford tuition for higher education.** High poverty rates on the Reservation may be impacting the lower than average college completion rates for tribal members. NWIC offers a variety of scholarships and tuition discounts to attract local students, but awareness of these programs may need improvement.
- **Families with young children need additional options for quality childcare.** Many families are low-income, led by single parents, or led by grandparents. These households benefit greatly from social support structures and programming for young children, which can relieve pressures on time and energy at home.
- **The community has expressed the need for additional youth education on important social issues.** Topics such as substance use disorder, suicide, and violence have been identified as important community issues. In-school programming with trained professionals can ensure that quality information is being provided to youth on these critical issues.
- **Vocational training and education programs could improve workforce development outside of traditional academic venues.** Both children and adults benefit from opportunities to learn skilled trades, particularly those relevant to regional industry. Integrating curriculum with secondary education and developing adult learning programs would enhance access to higher paying careers for Lummi people.

Our Plan

Young people are the future of the Lummi Nation. Caring for them, educating them, and instilling tribal values among the next generations is essential for continuation of the culture and vision of the Lummi people. This Plan outlines programs and policies to achieve the vision of a strong future by investing in today's youth. Desired outcomes in

- Education on the Reservation is high quality and culturally specific.
- Parents are supported in the raising of their children, starting during pregnancy.
- Youth on the Reservation attend highly rated schools and feel empowered to pursue higher education, if desired.
- The training and education programs offered to tribal members are relevant to job and career opportunities in the region.

Goals & Policies

Goal YE-1: All young children on the Reservation have access to culturally relevant, high-quality early childhood programs.

Policy YE-1.1: Expand investments in early education programs and home visiting programs that provide children with caregivers and learning environments that support their social, emotional, behavioral, cultural/spiritual, cognitive, and physical development.

Policy YE-1.2: Create programs that engage and support parents and caregivers of young children and increase family wellbeing.

Policy YE-1.3: Provide safe and stable environments for pregnant women and families with young children who are experiencing or at risk of homelessness.

Policy YE-1.4: Ensure programs are rooted in the Lummi Nation's culture, language, and community strengths.

Policy YE-1.5: Encourage cross-departmental partnerships across health, mental health, behavioral health, child welfare, early childhood, and home visiting programs.

Policy YE-1.6: Invest in research and evaluation of early childhood programs.

*Directors Meeting with Tribally
Operated Grant Schools 2014.*



Goal YE-2: All young children on the Reservation have access to quality daycare and after-school programming.

Policy YE-2.1: Increase access to daycare for infants and young children (under 5).

Policy YE-2.2: Increase access to quality after-school programming opportunities for youth.

Policy YE-2.3: Invest in facilities for youth wellness and recreation.

Goal YE-3: Lummi Nation Schools achieve rankings that meet or exceed those of neighboring school districts.

Policy YE-3.1: Improve Lummi Nation Schools.

Policy YE-3.2: Measure and report on success of academic programs.

Goal YE-4: All tribal members feel empowered to attain higher level degrees.

Policy YE-4.1: Increase access to NWIC.

Policy YE-4.2: Improve high school completion rates.

Goal YE-5: Tribal members feel prepared for available job opportunities in the region.

Policy YE-5.1: Develop vocational training programs for youth and adults.

Action Plan

Exhibit 11-4 identifies implementation initiatives or strategies related to culture the Tribe is prioritizing to accomplish prior to the next Community Plan Update.

Exhibit 11-4. Youth & Education Action Plan

Implementation Action	Responsibility
Goal YE-1: Culturally relevant, high-quality early childhood programs.	
Coordinate with Head Start on services for early learning.	Education
*Create a home visiting program to the community that emphasizes social emotional development and allows more families to access additional supports and resources.	Education, Youth Social Services
Consider creating Family Navigators who support families with developmental screenings, referrals, and care coordination.	Family Services
*Conduct community engagement and outreach events focused on social emotional development and parenting, such as activities for children 0-3 years old and their caregivers conducted by home visitors, and events for expectant families.	Education, Family Services
*Establish partnerships and collaboration across Lummi Nation departments to create early-childhood focused connections between behavioral health, community health, early care and education.	Education, Behavioral Health
Invest in early childhood Lummi language programs to strengthen, self-esteem, identity, and community connectedness.	Sche'lang'en, Education
*Partner with local school districts and non-tribal entities to align and improve supports for families.	Education, Family Services
Goal YE-2: Daycare and Afterschool Programs.	
*Partner with Silver Reef Casino Resort to develop an on-site daycare center for employee children.	Tribal Gaming Agency, Education
Engage with community members to identify locations for additional drop-off daycare centers in the community.	Education
*Identify potential leaders of daycare centers and connect these individuals to training and seed funding needed to develop a quality network of community childcare.	Education, CDFI
Ensure that students have affordable options for before or after-school programs that encourage academic performance.	Youth Social Services
*Expand active recreation programs for youth involvement. Utilize resources at Community Fitness Center and Loomis Trail Golf Course to engage young tribal members.	Youth Social Services, Health Clinic, LIBC

Policy Connections:
Culture

Policy Connections:
Economic Development

Policy Connections:
Economic Development

Policy Connections:
Parks & Public Spaces;
Health & Wellness



*Early Learning Field Trip at the
Outback Kangaroo Farm in Arlington.*



Implementation Action	Responsibility
Goal YE-3: Lummi Nation Schools.	
*Consider a comparable wage/salary/retirement/ pension Plan for Lummi Nation School teachers to improve retention.	Education, Lummi Economic Development Division
Work with families to identify causes for student absenteeism. Develop targets to ensure that all youth are attending school regularly.	Education
Increase access to technology for students at Lummi Nation Schools.	Education
Use Washington State testing metrics to develop focus areas for improvement relative to neighboring primary and secondary school districts.	Education
Integrate programs that teach test-taking skills for primary and secondary students.	Education
*Expand Lummi language programs to strengthen, self-esteem, identity, and community connectedness.	Education, Sche'lang'en
Goal YE-4: Postsecondary education.	
Connect students and parents to information about scholarships and financial aid available for Northwest Indian College (NWIC) degree programs.	Education, NWIC
*Increase participation in college-preparedness programs such as Native Pathways to College and Running Start.	Lummi Economic Development Division
Identify secondary students at-risk for dropout and provide mentorship for continuation.	Education, Youth Social Services
Goal YE-5: Adult Education & Training Programs that link to economic opportunities.	
Develop public-private partnerships to align training programs with the technical skills required by regional employers.	TERO
*Create a career technology center to address the need for vocational training for family-wage jobs.	Lummi Economic Development Division, Office of Economic Policy

Policy Connections:
Culture

Policy Connections:
Economic Development

Policy Connections:
Economic Development



12 HEALTH & WELLNESS

Purpose

This element explores assets and identifies needs for promoting health and wellness in the Lummi Nation community. Mental, physical, emotional, and spiritual health are all considered important for wellbeing.

This chapter includes:

- Health data and statistics for the Lummi Nation
- Review of nutrition and food access for tribal members
- Community concerns and ideas about health and wellness

Issues & Trends

Conditions & Trends

Health and Wellness needs within the Lummi Nation are served by the Lummi Tribal Health center (LTHC) and the Lummi Counseling Services and Suboxone Clinic (LCSSC). These institutions provide medical and dental care for both inpatient and outpatient clients. Their work includes adult and pediatric

Photo credit: Damon Winter/The New York Times/Redux.



primary care, dental care and psychiatric services, physical therapy, dental care, behavioral health services, preventative and public health services, a lab, and a pharmacy. Special programs and initiatives include:

- An integrated behavioral health and medical care service delivery model.
- New Beginnings services offering prenatal care for pregnant women.
- Food as Medicine initiative offering dietician-led lessons to youth and adults about healthy eating practices.
- Hepatitis C program treating patients and screening community members to identify and treat Hepatitis C.

- A Fitness Center offering exercise facilities and hosting community challenges such as the "Maintain, Don't Gain" series and the "5 Tribes Fitness Challenge."

Health Indicators

Health indicators suggest higher than average rates of reported disability for Lummi Reservation residents across almost all age and gender cohorts. Physical disabilities can limit one's ability to obtain full-time employment or to engage in physical activity. See **Exhibit 12-1**.

Exhibit 12-1. Population with a Disability, 2017

Population with a Disability	Lummi Reservation	Washington State	United States
Male	18.1%	13.0%	12.5%
Under 5 years	4.1%	0.7%	0.8%
5–17 years	15.7%	6.3%	6.7%
18–34 years	9.9%	7.6%	6.6%
35–64 years	20.6%	13.3%	12.9%
65–74 years	26.9%	28.0%	26.8%
75 years and over	46.7%	51.0%	48.0%
Female	18.9%	12.7%	12.7%
Under 5 years	0.0%	0.8%	0.7%
5–17 years	12.0%	3.9%	4.1%
18–34 years	10.1%	6.2%	5.6%
35–64 years	22.2%	12.9%	12.9%
65–74 years	43.5%	24.3%	24.1%
75 years and over	43.4%	52.2%	50.9%
Total	18.5%	12.8%	12.6%

Source: American Community Survey B18101 5-year estimates, 2013-2017; BERK, 2019.

AGING IN PLACE

Aging in place is a term used to describe the suitability of a community to support the needs of adults as they get older without sacrificing quality of life. As people age, they experience changes in their physical and cognitive capacities. These changes affect people differently and at different times of their life, but it is important to remember that many older adults are living on modest, fixed incomes.

Strategies include:

1. Naturally Occurring Retirement Communities: Identify existing clusters of older residents and bring public health amenities, such as walking trails, to those neighborhoods.
2. Virtual Villages: Older adults collaborate to pool resources for services that allow them to stay in their homes longer, such as transportation, housekeeping, and organized social events.

Food Access

The USDA identifies the Lummi Reservation as a low access food zone, commonly referred to as a food desert, with its combination of low-income households and long travel distances to grocery stores. Many households do not own a car and have no options within walking distance for fresh produce. Even residents with a car often drive over 20 miles to the nearest supermarket, as food choice on the Reservation is limited to gas station convenience stores and seasonal fish markets (See **Exhibit 12-2**). The US Government's Food Distribution Programs on Indian Reservations (FDPIR), also known as commodities or 'commod', provides some fresh food to tribal members but this needs to be strengthened. Overall, poor food access leads to a less healthy diet for residents, which can contribute to many health issues.

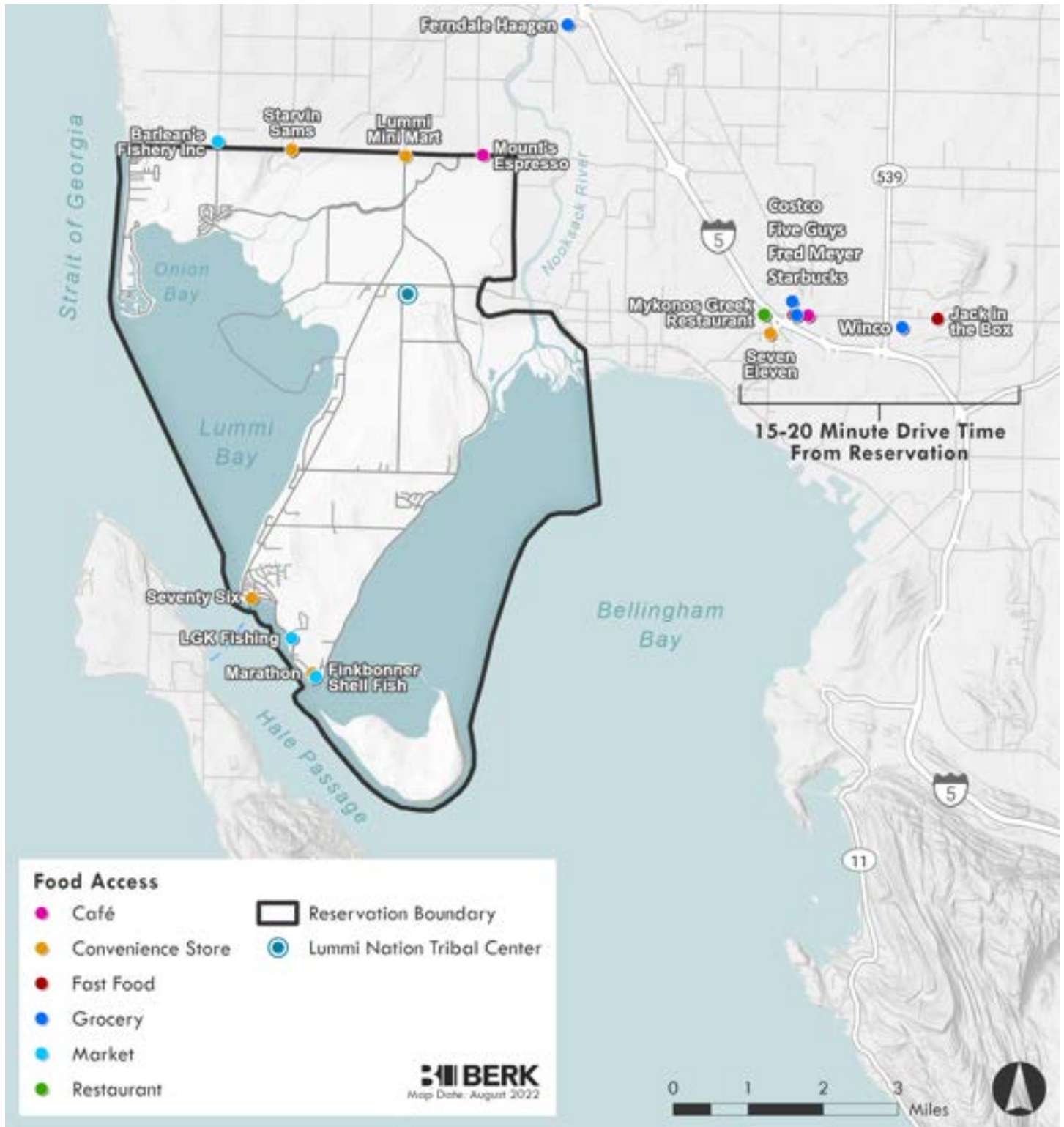
Community Concerns

Outreach with tribal members from the 2010 Community Plan revealed patterns of concerns for the community. Some are dissatisfied with the current healthcare services and limited options provided at the clinic. Many voiced the need for support to combat issues of substance use disorder and domestic violence. Improved family counseling services, preventative programs, and a safehouse for children were all mentioned as needs. Others discussed the desire for additional recreation opportunities and family-based fitness programming.

Community engagement for the 2019 Plan repeated many of these sentiments.

- Residents continue to highlight substance use disorders as a major concern for tribal members.
- In addition, the need for female-specific addiction treatment and transitional housing was expressed.
- With a relatively high proportion of older adults, there is a need for hospice care on the Reservation as current options are concentrated in Bellingham.
- The COVID-19 pandemic exacerbated existing health access issues.
- Access to public services like trash pickup, clean water and sewer are also concerns.

Exhibit 12-2. Food Access on Lummi Reservation, 2019



Source: Lummi Nation, 2019; BERK, 2019.

*Lummi seafood
study, salmon BBQ.*



Challenges & Opportunities

This chapter identifies various health and wellness challenges facing the community and outlines strategies to address these issues.

- **Tribal members face challenging housing situations.** Some members currently do not have access to clean water, internet, and sewer and this affects their health access and overall outcomes.
- **Tribal members face environmental health threats such as lead and air pollution.** Reducing exposure to environmental health threats is an important need.
- **Tribal members want more options and better local healthcare services.** Currently, care is provided by the Lummi Nation Clinic and Life Center. Community members express the desire for more options and improved services. Construction plans are in place to build a new and expanded Clinic on the Reservation by April 2023 to better serve residents' needs.
- **High rates of drug and alcohol use disorders are reported among Lummi Nation members.** Additional counseling services, particularly models that focus on holistic family care, are desired by community members. Existing educational programs focusing on preventative measures for youth that are incorporated into school curriculum need to be scaled up. A treatment center and transitional housing specifically geared toward women would provide a safe space for recovery.
- **Families need protection and counseling services to address issues of domestic violence.** Identifying resources to create a safe house for victims, counseling for families, and support for mental health can help promote healing for all parties. Access to resources during times of emotional stress can relieve barriers to healthy recovery for victims.
- **The Lummi Reservation is a low access zone for fresh produce and healthy foods.** Programs that encourage gardening, local agriculture, and food services within the Reservation boundaries could address the critically low access to healthy and traditional food currently provided to residents. Expanding existing nutrition initiatives to include a local farmers' market could promote healthier eating and local sovereignty. The Commods program and the community garden at the clinic provide access to fresh produce but these efforts need to be sustained and strengthened.
- **Access to recreation facilities is important for promoting adult fitness and wellbeing.** Additional recreation opportunities can be created by emphasis on greenspace and walkability in the community. A network of trails

connecting across the community can encourage active mobility for all ages. Expanded Fitness Center facilities and programming can offer space for intergenerational activity.

- **Facilities for youth-focused wellness and recreation are needed.** Recent land purchases, existing underutilized parcels, and facility expansion opportunities all offer the potential for developing a more robust parks and recreation network throughout the Reservation. Development of a comprehensive trail network across Lummi territory would enhance mobility across age groups.

Our Plan

Our plan is to leverage community resources to enhance the physical, mental, and emotional wellbeing of all Lummi people.

To achieve this vision, our Health and Wellness Plan has policy, programmatic, and regulatory components:

- Provide intergeneration opportunities for recreation
- Educate tribal members about community health concerns such as nutrition and substance use disorder
- Expand Health Clinic and Fitness Center facilities to better serve the Lummi people
- Cultivate a network of community gardens and collective knowledge of traditional food practices
- Offer holistic healthcare services that promote positive social outcomes

Our goals and policies provide our aims, guidelines, and strategies to implement this plan.

Goals & Policies

Goal HW-1: Tribal members have adequate access to physical and mental health services.

Policy HW-1.1: Expand access to high-quality health services.



Wellness
parade, 2011.

Policy HW-1.2: Promote cross sector partnerships that for address the determinants of health, including access to housing, transportation, and improved job readiness.

Policy HW-1.3: Increase investments to engage, support and protect tribal members with disabilities.

Policy HW-1.4: Increase investments to engage, support and protect elders.

Policy HW-1.5: Provide protection to victims of domestic violence both for immediate physical safety and long-term wellbeing.

Policy HW-1.6: Support and coordinate reentry programming and programming for incarcerated persons and their families, especially their children.

Policy HW-1.7: Improve data collection systems for health data.

Policy HW-1.8: Support implementation of tribal, federal, and/ or state partnerships that increase access to wraparound health services.

Access to fresh food.



Goal HW-2: The Lummi Nation is free from drug and alcohol use disorders. Families have access to needed counseling services for ongoing care and healing.

Policy HW-2.1: Provide a range of treatment, support and services for mental and substance from prevention for individuals at all levels of risk through recovery.

Policy HW-2.2: Prioritize and collaborate on counseling or other behavioral health-related prevention efforts as a primary strategy.

Policy HW-2.3: Support and train community members to serve as peer counselors.

Policy HW-2.4: Identify and treat victims of opioid addiction.

Policy HW-2.5: Support suicide prevention efforts that include youth, families, communities and schools.

Goal HW-3: Fresh, traditional foods are available to Lummi families within the Reservation

Policy HW-3.1: Start a community gardening program

Policy HW-3.2: Develop a food sovereignty code which aligns Lummi values with the local food system.

Goal HW-4: Tribal members have access to active recreation opportunities.

Policy HW-4.1: Develop a comprehensive parks network.

Policy HW-4.2: Improve opportunities for active recreation and walking.

Policy HW-4.3: Create or expand recreation programs and facilities that increase health and wellbeing.

Action Plan

Exhibit 12-3 identifies implementation initiatives or strategies related to culture the Tribe is prioritizing to accomplish prior to the next Community Plan Update

Exhibit 12-3. Health & Wellness Action Plan

Implementation Action	Responsibility
Goal HW-1: Access to health services.	
Build a new Health Clinic with increased programs for holistic treatment programs and addiction treatment.	Health Clinic
*Invest in a hospice for Lummi Nation members.	Health Clinic, Family Services
Consider longer-term care options for older Lummi Nation members.	Family Services
*Establish universal design guidelines for Lummi Nation members with disabilities.	Health Clinic, Family Services
Establish safe houses for children and other victims of domestic violence.	Family Services
*Provide counseling services for individuals and families for all reported incidents of violence.	Family Services, Kwenangets
Continue and expand The Lummi Behavioral Accountability Program. Monitor progress of the program and continually work to ensure effectiveness.	Behavioral Health
Create programs for students to raise awareness about domestic violence, teach preventative skills, and inform youth about their options for safety and legal protection.	Behavioral Health
Consider creating Family Navigators who support families with developmental screenings, referrals, and care coordination.	Family Services

*Policy Connections:
Parks & Public Spaces*

*Policy Connections:
Justice & Safety*

*Policy Connections:
Youth & Education*

	Implementation Action	Responsibility
	Establish dialogue between health, housing and planning staff to identify priority areas for infrastructure improvements.	Health Clinic, Planning, Housing
	Goal HW-2: Drug & alcohol misuse disorder.	
	*Integrate drug awareness and training curriculum into Lummi Nation schools.	Youth Social Services, Education
	Create a women-only treatment center and transitional housing units.	Behavioral Health
	*Successfully complete the 5-year CDC grant awarded to create and implement an action plan addressing the opioid epidemic.	Behavioral Health, Family Services
	Engage families with history of substance use disorder to discuss needs and desires for counseling services.	Tribal Health Center
	Employ multiple styles and techniques for counseling services that holistically address the needs of individuals, couples, and families	Behavioral Health
	Goal HW-3: Food access and nutrition.	
	Engage interested in families in starter programs for vegetable gardens at home.	Health Clinic
	Create space for neighborhood gardens within walking distance of families.	Planning
	*Provide a venue, such as a farmer's market, to sell and trade fresh foods.	Lummi Economic Development Division
	*Partner with the Lummi Nation School to involve students in gardening programs which correlate with nutrition training.	Education, Health Clinic
	Develop a plan for food sovereignty on the Reservation.	Health Clinic
	*Engage community and local historians to gain historic and modern knowledge on nutrition and food practices.	Health Clinic, NWIC
	Continue and expand nutrition training, such as the Food as Medicine programs.	Health Clinic
	*Work with youth and school cafeterias to encourage healthy eating practices at an early age and incorporate traditional foods onto the local school menu.	Education, Health Clinic
	Goal HW-4: Recreation & physical fitness.	
	Create a tribal department focused on the creation and management of a parks system that serves all community members.	LIBC
	*Develop an interconnected trail system allowing residents to walk or bike to local destinations.	Transportation, Planning
	New Clinic and Fitness Center facilities are updated and account for the exercise needs of children, adults, and older adults.	Health Clinic
	Expand participation in successful group fitness programs such as the 5 Tribes Fitness Challenge and the Maintain, Don't Gain Winter Challenge.	Health Clinic
	Newly acquired golf course introduces youth sports programming as well as discounted membership opportunities for tribal adults and families.	Youth Social Services

Policy Connections:
Justice & Safety

Policy Connections:
Parks & Public Spaces

Policy Connections:
Land Use; Transportation

Policy Connections:
Youth & Education

Policy Connections:
Economic Development;
Parks & Public Spaces



13 JUSTICE & SAFETY

Purpose

This element addresses the legal and safety needs for the Lummi Nation community. This includes advocacy for victims, support for rehabilitation, and strategies for authorities involved in creating a safe and just environment for all residents.

This chapter includes:

- Review of identified issues for the Lummi community such as substance use disorder, domestic violence, and road safety.
- Identification of existing and needed support resources for victims.

Issues & Trends

Law & Justice Context

The Lummi Nation makes its own laws and its peoples are governed by them. The Lummi law and justice system is meant to respond to issues, disputes, and crimes within the community, and the system includes law enforcement, courts, and correction. The goal of the system is to deter crime, protect victims, ensure accountability for offenders, and the segregation and rehabilitation of offenders when needed to protect the community.

TRIBAL LAW AND ORDER ACT (2010)

The TLOA grants additional duties to the federal government and tribal authorities. The federal government now has a greater responsibility to collect crime data on tribal communities to track the progress of the Act and identify which programs are effective. They were also required to increase federal involvement in prosecuting crimes. Simultaneously, tribes were required to reform their justice systems to be more in line with the Constitutional due process. In return, tribes are given stronger sentencing authority. The Act also aimed to clarify jurisdictional problems between federal, state, and tribal governments.

While the Tribal Law and Order Act was an important milestone in recognizing tribal sovereignty and took important steps towards combating crime on reservations, there is still considerable work to be done. Tribes and government agencies have raised concerns about respect for traditional justice systems, funding, and sufficient federal and state action.

Source: [A Broken Justice System: Examining the Impact of the Tribal Law and Order Act of 2010 and Public Law 280](#), by Sophia Helland '20 | April 2018

In 1968, the Indian Civil Rights Act (ICRA) was passed which indicates federally recognized Native American tribes can sentence and convict individual offenses by Native American offenders taking place on tribal lands. In 1986, ICRA was amended to limit Tribal sentencing of any one offense to no more than one year and \$5,000 in fees, certain other felonies being deferred to federal prosecution under the Major Crimes Act and General Crimes Act. However, federal support has been lacking and most crimes taking place on reservations are either not prosecuted or result in a very short sentence. The Tribal Law and Order Act (TLOA) was passed in 2010 to address deficiencies, though more work needs to be done.

The laws are complex regarding non-tribal members, with enhanced ability to prosecute perpetrators of domestic violence, sexual assault, dating violence, and violation of protection orders:¹

The U.S. Supreme Court decision [Oliphant v. Suquamish Indian Tribe](#), 435 U.S. 191 (1978) limits the ability of Native Nations to try and punish non-Indians. Under this decision, Native Nations generally do not have jurisdiction to prosecute non-Indians. The Violence Against Women Act Reauthorization of 2013 slightly modified this decision however. A Native Nation may choose to exercise "Special Domestic Violence Criminal Jurisdiction (SDVCJ) and exert their inherent ability to prosecute non-Indians who commit the following offenses: domestic violence, sexual assault, dating violence, and violation of protection orders. In order to exercise SDVCJ, the Nation must meet certain requirements.

The Lummi Nation has identified a lack of resources and gaps in the law and justice system including domestic violence and TLOA:²

- Not enough funding is available for the training and retention of law enforcement officers.
- Problems in enforcing tribal protection orders between the tribal, county, and state entities.
- TLOA has good intentions but has different strengths and weaknesses for every tribe.

¹ [General Guide to Criminal Jurisdiction in Indian Country.](#)

² [U.S. Department of Justice Office on Violence Against Women, 2012 Tribal Consultation Report.](#)

Conditions & Trends

Substance Misuse

The top safety and justice issue identified during the engagement process was substance use disorder, including punishment for those involved in illicit sales and safety of those living in a household where a family member suffers from substance use disorder. Creating a safe house for children and exploring new options for enforcement tactics were both expressed as needs. In addition to drug and alcohol use disorder, road safety was a top concern. Ensuring safety for drivers and pedestrians is an important tribal priority.

Domestic Violence

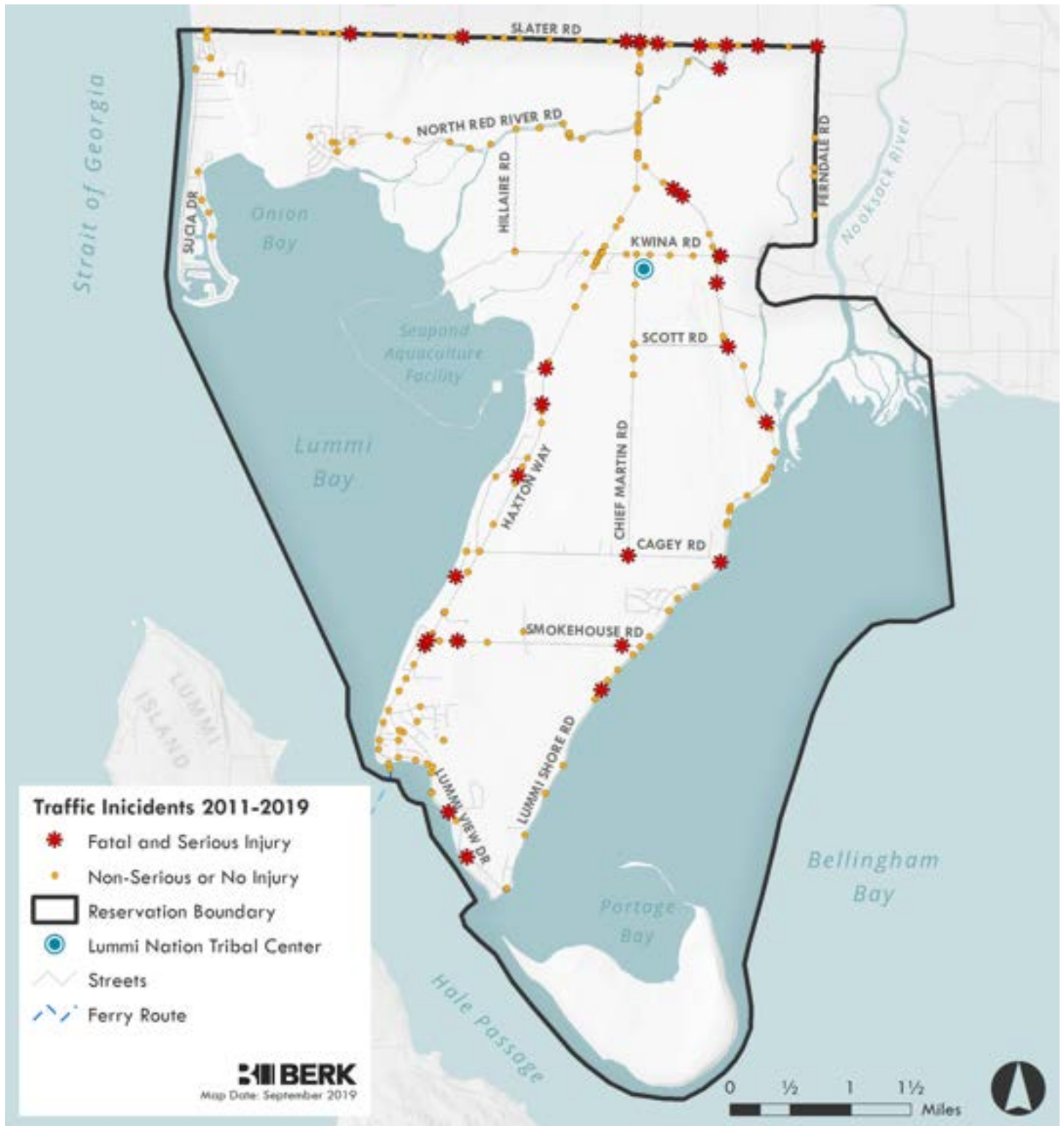
Engagement for this Plan revealed community concerns around domestic violence. This is supported by research and data across the country that have demonstrated that Native women suffer violence at high rates. The Tribal Law and Order Act and Violence Against Women Act each focus efforts on women living on Reservations, finding that over 50% of these women will be victims of sexual violence and that the risk of sexual assault or rape is 2.5 times higher for Native women than the rest of the country.

Perpetrators of this violence are more likely to be non-Indian. The Urban Indian Health Institute predicts that these statistics underestimate rates of violence against women, due to systemic issues of underrepresentation and distrust of law enforcement. While it is impossible to know how these statistics apply specifically to Lummi women on the Reservation, this is a serious issue of concern.

Road Safety

Road safety is another key safety issue on the Lummi Reservation, with 6 crash fatalities and 24 serious injuries from 2011-2018 (see **Exhibit 13-1**). Accidents are predominantly located on perimeter arterials of Slater Road, Haxton Way and Lummi Shore Road, as well as a few scattered across the east/west connector streets. Of the 24 highlighted incidents, 9 involved a driver under the influence of drugs or alcohol. Most roads within the Reservation do not incorporate sidewalks, and this fractured pedestrian network leaves residents on foot vulnerable to collisions. (See **Exhibit 8-3** for the pedestrian network).

Exhibit 13-1. Crash Fatalities and Serious Injuries, 2011-2018



Source: Lummi Nation, 2019; BERK, 2019.

According to the Lummi Police Department reports consistent levels of drug investigations and driving under the influence cases from 2017-2018. The quantity of drug education demonstrations has remained constant as well, at 10 per year.

Community Concerns

Public engagement conducted in 2019 echoes the three major safety and justice concerns discussed above (substance misuse, domestic violence, and road safety). Ensuring a safe and just society is a key function of tribal governance within the Lummi Nation. Exposure to trauma through violence can lead to long-term negative mental health impacts, correlated with issues of substance use disorder and suicide. Access to trusted enforcement and justice systems are key for citizen wellbeing and effective community communication. Lummi Nation residents report issues of substance use disorder, domestic violence, and child welfare violations.

Challenges & Opportunities

- **Enforcement of drug charges is not satisfactory for community members.** Law enforcement and social service providers are coordinating to develop effective approaches aiming to reduce illegal drug use on the Reservation. These efforts should continue, with regular review and update to enhance effectiveness.
- **Prevention and rehabilitation programs are prioritized for offenders.** Students at Lummi Nation Schools should receive education and awareness trainings about drug and alcohol use disorders. Counseling services and recovery resources are important for hopes of preventing relapse offenses. Providing rehabilitation space and transitional housing specific to women is an identified community need.
- **Issues of domestic violence and child welfare are reported by community members.** Children should have a safe space for protection from violence, drug use disorder in the home, or other welfare-related issues. Victims should have access to legal protection and care.
- **Serious injuries and fatalities occur on Reservation roads as the result of preventable accidents.** Lummi Nation roads should be safe for all people. Areas of repeated accidents should be monitored for potential reductions in speed limit and enhanced enforcement.

Our Plan

Our plan is to ensure that the rights of each Lummi member are protected and defended. The Lummi Reservation will be safe for all residents.

To achieve this vision, our Safety and Justice Plan has policy, programmatic, and regulatory components:

- Protect, defend, and offer social services to survivors of violence.
- Invest in additional resources in the criminal justice system that strives to rehabilitate offenders so they can rejoin society in a healthy manner.
- Increase enforcement and awareness programs to eliminate illegal substances from the Reservation.
- Enforce traffic laws protect the safety of all road users.

Our goals and policies provide our aims, guidelines, and strategies to implement this plan.

Goals & Policies

Goal JS-1: Victims of violence have access to effective resources for physical safety and legal protection.

Policy JS-1.1: Provide legal protection to all victims of violence.

Policy JS-1.2: Ensure consistent, high-quality law enforcement response that is responsive to complaints of domestic violence and effective at protecting victims.

Policy JS-1.3: Track data on the scope and magnitude of sexual violence among Lummi people on the reservation.

Policy JS-1.4: Increase community awareness of domestic violence and services available to address it.

Policy JS-1.5: Increase access to legal help for families who encounter the criminal justice system.

Goal JS-2: The sale and use of illegal drugs is eliminated from the Lummi Reservation.

Policy JS-2.1: Offenders are provided with rehabilitation services to reduce repeat sentencing.



*Wellness
parade, 2011.*

Policy JS-2.2: Prevention programs are integrated into curriculum at Lummi schools.

Goal JS-3: There are no traffic fatalities within the Lummi Reservation.

Policy JS-3.1: Reduce speed limit on priority corridors where fatal crashes have occurred.

Policy JS-3.2: Increase enforcement for offenses that lead to serious accidents.

Policy JS-3.3: Improve pedestrian infrastructure for a safer walking environment throughout the Reservation.

*2012 Squaxin
Island Protocol.*



Action Plan

Exhibit 13-2 identifies implementation initiatives or strategies related to culture the Tribe is prioritizing to accomplish prior to the next Community Plan Update. Action steps listed in more than one department are highlighted with an asterisk.

Exhibit 13-2. Justice & Safety Action Plan

Implementation Action	Responsibility
Goal JS-1: Violence.	
Establish safe houses for children and other victims of domestic violence based on the Domestic Violence Housing First model that includes housing and programs that help with safety, self-sufficiency, and healing.	Family Services
*Provide mental health services that incorporate the specific context of domestic violence victims.	Family Services, Kwenangets
*Connect victims of violence with resources for legal counsel. This includes assistance with non-criminal protective orders, family law related to divorce and child custody, as well as assistance around eviction or other housing related issues.	Office of Reservation Attorney
*Empower legal bodies to prosecute perpetrators of violence.	Office of Reservation Attorney, Courts
Train Health Clinic staff on trauma-informed care and response to reports of sexual assault and rape.	Health Clinic
*Increase awareness among students at Lummi Nation School and NWIC of sexual violence threats and resources available for reporting, protection, and counseling.	Education, Youth Social Services
*Provide information at after school or other youth programs that can help young people recognize or get help with domestic violence, especially dating violence.	Education, Youth Social Services
Police officers are trained in best practices for supporting victims of violence.	Lummi Police Department
Reinstitute a family court to put in place customary adoptions.	Youth Family Services
Goal JS-2: Illegal substances	
Preventative programs focusing on drug use are incorporated into the Lummi Nation School.	Education, Youth Social Services
*Law enforcement and behavioral health departments coordinate to devise effective, holistic strategies to address drug sales and use disorder.	Lummi Police Department, Behavioral Health
*Rehabilitation programs integrate both counseling services and job training to provide alternative pathways.	Behavioral Health, Lummi Economic Development Division

Policy Connections:
Housing & Homelessness

Implementation Action	Responsibility
Goal JS-3: Road safety	
Increased enforcement of speeding, driving under the influence (DUI), and other reckless driving behaviors.	Lummi Police Department
*Reduce speed limits to meet safety guidelines from Vision Zero. On Haxton Way, reduce 50 mph speeds to 35-45 mph, more consistent with the rest of the corridor. Kwina Road speed limit reduced to 25-30 mph to acknowledge new residential and mixed-use developments.	Transportation, Lummi Police Department
*Establish a Safe Routes to Schools program to improve pedestrian safety and encourage active transportation.	Transportation, Planning
*Design the Pedestrian Master Plan to minimize conflicts, street crossings, and travel along high speed, high traffic streets.	Transportation, Planning

Policy Connections:
Transportation

Policy Connections:
Transportation

Policy Connections:
Transportation



14 IMPLEMENTATION & MONITORING

The adoption of this Community Plan is the first step in the implementation process. Ongoing actions to implement the Plan will be needed to achieve the Plan's vision.

To support an effective implementation program, this section includes:

A comprehensive listing of specific actions, and responsibilities for leading and supporting the actions by department, in an Action Plan Matrix. This matrix will support the Nation's budgeting and implementation processes, and provide a mechanism for assessing progress. The Action Plan matrix compiles each of the Plan's action items from topical chapters. Actions items are assigned to departments and tied to specific goals of the Plan. All of the actions listed in the Action Plan Matrix are excerpted from the chapters of the Plan. Relevant chapters have more information and context for actions.

The Community Plan monitoring program has two components – implementation monitoring and performance monitoring, described below. Implementation monitoring will track which of the action items are being implemented and the extent to which departments are working together. Performance monitoring will show whether actions are achieving the desired results. Performance indicators for the Plan are listed on the following page.

Performance Indicators

- Protect and restore habitat and water resources (Measure: Salmon population)
- Implement the Plan (Measure: Percentage of Action Items completed)
- Preserve and strengthen culture (Measure: Number of Lummi students who complete Associate or Bachelors degrees from NWIC, Attendance at Cultural Events)
- Promote affordable and diverse housing stock (Measure: Percentage of cost-burdened households, proportion of multi-family housing units)
- Increase access to employment (Measure: employment rate, participants in job training program)

Action Plan Matrix

This section includes a comprehensive listing of specific actions by department, and related goals, in an Action Plan Matrix. This matrix will support the Nation's budgeting and implementation processes, and provide a mechanism for assessing progress.

Sche'lang'en Department

Number of Actions 27

Chapter	
Sovereignty & Nation Governance	#
Culture	#
Natural Environment & Sustainability	#
Economic Development	#
Community Design Framework	#
Land Use	#
Housing & Homelessness	#
Transportation	#
Parks & Public Spaces	#
Public Facilities & Infrastructure	#
Youth & Education	#
Health & Wellness	#
Justice & Safety	#

Action Item		Goals Achieved
1	Participate in land use permitting an environmental review processes when cultural resource impacts are possible	C-1
2	Review planning and permitting processes to ensure the protection of cultural resources.	C-1
3	Real estate acquisition projects are informed by a resource protection strategy.	C-1
4	Develop a set of design guidelines for architecture and development which align with Lummi values.	C-1, LU-2
5	Define the most urgent threats to intangible re-sources. Develop a protection plan.	C-1
6	Complete an enhanced land inventory and capaci-ty analysis. Identify areas that are better for de-velopment and areas better for preservation.	C-1, LU-1, PR-5
7	Inventory cultural resources, including off Reserva-tion burial sites. Develop a prioritization list of pro-tections needed and an implementation strategy.	C-1
8	Develop a prioritization list of burial site protec-tions needed and develop a strategy to implement.	C-1
9	Work with Lummi Planning Department in support of land acquisition efforts.	C-2
10	Engage proactively in off-Reservation cultural re-source management	C-2
11	Participate in the federal Section 106 Review pro-cess.	C-2
12	Identify and train teachers for Coast Salish culture classes.	C-3
13	Develop a curriculum and standard for students who participate in culture classes.	C-3
14	Invest in early childhood Lummi language programs to strengthen, self-esteem, identity, and community connectedness.	PR-7
15	Continue to grow successful cultural events, such as Paddle to Lummi and the First Salmon Ceremony.	C-3
16	Continue to incorporate Xwlemi Chosen (Lummi lan-guage) and values into curriculum at Lummi Nation School and NWIC.	C-3, YE-3
17	Offer Xwlemi Chosen classes in a range of fluency levels and approaches (written, spoken, oral, physi-cal).	C-3
18	Focus on creating language skills through the use of language with practical activities, cultural activi-ties, and family relationships.	C-3

Action Item	Goals Achieved
19 Create and fund an ongoing oral history program that allows community members to record and se-cure their stories for the benefit of future genera-tions.	C-3
20 Establish a venue for cultural performances by local musicians, theater, and other artists within the com-munity.	C-3
21 Conduct a code audit to identify barriers to mixed-use and multi-family development and identify areas where the zoning and related regulations need updates such as to the Permitted Uses Table or other areas.	LU-1
22 Complete an enhanced land inventory and capaci-ty analysis. Identify areas that are suitable for de-velopment and areas needed for preservation.	LU-1, C-1, PR-5
23 Develop design guidelines for new construction and adaptive rehabilitation for a Reservation aesthetic aligned with Lummi values and traditions.	LU-2, C-1
24 Create a menu of housing types and styles that align with Lummi values and community needs.	LU-2
25 Create gateway elements at the various entrances to the Reservation and to identify Residential Vil-lage nodes.	LU-2
26 Invest in early childhood Lummi language programs to strengthen, self-esteem, identity, and community connectedness.	C-3, YE-1
27 Expand Lummi language programs to strengthen, self-esteem, identity, and community connectedness.	YE-3, C-3

Planning Department

Number of Actions 65

Chapter	
Sovereignty & Nation Governance	#
Culture	#
Natural Environment & Sustainability	#
Economic Development	#
Community Design Framework	#
Land Use	#
Housing & Homelessness	#
Transportation	#
Parks & Public Spaces	#
Public Facilities & Infrastructure	#
Youth & Education	#
Health & Wellness	#
Justice & Safety	#

Action Item		Goals Achieved
1	Participate in land use permitting an environmental review processes when cultural resource impacts are possible	C-1
2	Expand Stommish Grounds.	C-1, LU-2
3	Review planning and permitting processes to ensure the protection of cultural resources.	C-1
4	Real estate acquisition projects are informed by a resource protection strategy.	C-1
5	Complete an enhanced land inventory and capacity analysis. Identify areas that are better for development and areas better for preservation.	C-1, LU-1, PR-5
6	Develop a prioritization list of burial site protections needed and develop a strategy to implement.	C-1
7	Establish a venue for cultural performances by local musicians, theater, and other artists within the community.	C-3
8	Initiate subarea planning for Gooseberry Point and the I-5 properties, with a strong economic development focus.	ED-1
9	Improve the marine infrastructure at Gooseberry Point, including modernization of boat launching facilities.	ED-1, T-6
10	Create formal and informal agreements such as Memoranda of Understanding and interagency procedures to guide coordination between tribal and county planning agencies.	ED-3
11	Identify staff capacity to update zoning and development standards.	LU-1
12	Conduct a code audit to identify barriers to mixed-use and multi-family development and identify areas where the zoning and related regulations need updates such as to the Permitted Uses Table or other areas.	LU-1
13	Identify ways to support innovative housing formats and alternatives such as ADUs and tiny homes through regulations.	LU-1
14	Draft zoning and code amendments. Engage community on amendments and adopt amendments.	LU-1
15	Create a pre-permitted set of housing options for tribal members to choose from to complement new zoning.	LU-1
16	Complete an enhanced land inventory and capacity analysis. Identify areas that are suitable for development and areas needed for preservation.	LU-1, C-1, PR-5
17	Develop design guidelines for new construction and adaptive rehabilitation for a Reservation aesthetic aligned with Lummi values and traditions.	LU-2, C-1

Action Item	Goals Achieved	
18	Establish Gooseberry Point, Kwina Road and Red River as mixed-use Residential Villages.	LU-2
19	Conduct subarea planning processes for these three nodes with community visioning sessions and work-shops to gather public feedback.	LU-2
20	Consider Sandy Point, and Smokehouse Road neighborhoods for future Residential Village nodes.	LU-2
21	Encourage infill housing and neighborhood services to foster more complete communities.	LU-2, HH-1
22	Create a Master Pedestrian Plan for the Reservation. Create paths within and between Village nodes.	LU-2, T-3, HW-4
23	Consider a trail network connecting east to west across the Reservation. Trails could run along Slater Road, N Red River Road, and Smokehouse Road.	LU-2, T-3, PR-1
24	Develop Economic Development nodes at the commercial center along Slater Road and the newly acquired I-5 properties.	LU-3
25	Allocate land to economic development programs and projects likely to provide job opportunities for Tribal members.	LU-3
26	Invest in an electronic permitting system.	LU-4
27	Monitor and track fee land properties for sale within the Reservation.	LU-4
28	Monitor housing sales in the Reservation.	LU-4
29	Collaborate to address land ownership challenges by continuing to implement the Strategic Land Acquisition Plan. The acquisition plan defines the policies and procedures for re-acquiring land, prioritizes purchase decisions, targets high priority or jeopardized properties, and sets a budget standard for acquisition funding.	LU-4
30	Identify staff or consultant capacity for a housing needs analysis	HH-1
31	Collaborate with the Lummi Housing Authority to ensure future Housing Authority projects are located around established nodes, connecting residents to resources.	HH-1
32	Leverage Opportunity Zone status to attract financing for multi-family projects.	HH-1
33	Encourage infill housing and neighborhood services to foster more complete communities.	LU-2, HH-1

	Action Item	Goals Achieved
34	Identify funding opportunities to complete necessary upgrades and repairs, particularly for housing stock that currently serves low-income families.	HH-2
35	Conduct a code audit to identify and remove any barriers to diverse housing types such as tiny homes, two and 3-bedroom multi-family units, and mixed-use housing formats.	HH-2
36	Create a program with "housing navigators," who point tribal residents toward suitable housing, help with credit-related issues, and give neighborhood tours.	HH-2
37	Collaborate with Lummi CDFI on improving credit and access to capital for housing for tribal members.	HH-2
38	Identify staff capacity for a point person to address legal barriers to land ownership for tribal members.	HH-4
39	Raise property rights awareness among Lummi people and explain necessary steps to reclaim land.	HH-4
40	Identify funding opportunities for projects that enhance connectivity within and between residential villages, job centers, and public amenities.	T-1
41	Create Pedestrian Master Plan. Identify missing links in the existing pedestrian network to connect important destinations and complete routes.	T-3, LU-3, HW-4
42	Establish a Safe Routes to Schools program to improve pedestrian safety and encourage active transportation.	T-3, JS-3
43	Design the Pedestrian Master Plan to minimize conflicts, street crossings, and travel along high speed, high traffic streets.	T-4, JS-3
44	Offer flexible incentives and tools to make progress towards ultimate system design for the Pedestrian Master Plan.	T-5
45	Pursue relocation of ferry terminal and harbor re-development, prioritizing the needs of Lummi Island residents, traffic safety, and long-term mobility benefits for the community.	T-6
46	Create space for neighborhood gardens within walking distance of families.	HW-3
47	Develop an interconnected trail system allowing residents to walk or bike to local destinations.	HW-4, PR-1, LU-3
48	Establish a Safe Routes to Schools program to improve pedestrian safety and encourage active transportation.	T-3, JS-3
49	Design the Pedestrian Master Plan to minimize conflicts, street crossings, and travel along high speed, high traffic streets.	JS-3, T-4
50	Strengthen regulatory flood risk reduction measures	N-6

Action Item	Goals Achieved
51	Continue to pursue land acquisition, building relocation or demolition, and open space preservation in special flood hazard areas.
52	Coordinate land acquisition, zoning changes, development restrictions, and/or other regulatory tools as appropriate to reduce property damage from flooding.
53	Explore the revision of the Building Code (LCL Title 22) by the more widely used International Building Code (IBC).
54	Update Lummi Nation zoning to implement the transition to a neighborhood structure with focused density and place-based districts.
55	Develop design guidelines for new construction and adaptive rehabilitation for a Reservation aesthetic aligned with Lummi values and traditions.
56	Create a menu of housing types and styles that align with Lummi values and community needs.
57	Create gateway elements at the various entrances to the Reservation and to identify Residential Village nodes.
58	Expand Stommish Grounds.
59	Identify and put in place regulations to protect scenic resources, such as Hales Passage and Lummi Shore Drive.
60	Use capital improvement planning to ensure infrastructure planning supports development opportunities
61	Develop a Stormwater Masterplan to guide storm-water infrastructure development.
62	Maintain a PROS Plan for grant eligibility
63	Improve existing parks and trails
64	Increase neighborhood and community parks and trails
65	Adopt regulations to ensure adequate parks and public spaces as development occurs

Natural Resources

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Action Item		Goals Achieved
1	Continue to grow the Portage Bay Partnership, protecting natural resources along the coast. Set benchmarks for water quality improvement.	C-1, ED-2
2	Expand Stommish Grounds.	C-1, LU-2
3	Continue environmental enhancement efforts through Portage Bay Partnership, allowing for shell-fish harvest and restoration of water quality.	ED-2, C-1
4	Allocate land to economic development programs and projects likely to provide job opportunities for Tribal members.	LU-3
5	Promote a Natural Resources-based economy by identifying and protecting sites for perpetual harvest of timber or non-timber forest products.	LU-3
6	Explore strategies to improve lateral connectivity such as levee removal, reconnection of floodplain features, creation of new floodplain habitats).	N-2
7	Consider planting trees and other vegetation to improve riparian function	N-2
8	Explore strategies such as removing cattle to re-store vertical connectivity.	N-2
9	Explore actions such as beach nourishment, planting vegetation, anchoring large woody debris, natural breakwaters to minimize erosion while still maintaining wetland habitat and sediment transport.	N-2
10	Prevent and reverse habitat destruction, replace undersized culverts and other barriers to migration, prevent pollution, and restore instream flows.	N-4
11	Increase enforcement and other actions to achieve and sustain federal, state, and Lummi Nation water quality standards.	N-4
12	Ensure continued water quality monitoring through programs such as the Pacific Shellfish Institute's water chemistry monitoring program at the Lummi Bay Shellfish Hatchery, and the Lummi Water Resources Division (LWRD) ambient water quality monitoring program that samples fresh and marine waters on the Reservation.	N-4
13	Support the Lummi Bay Shellfish Hatchery's restocking of tribal tidelands with manila clam seed, and oyster spat. Support the hatchery's production and sale of geoduck seed to offset operation costs.	N-4
14	Strengthen regulatory flood risk reduction measures	N-6
15	Upgrade infrastructure to accommodate or protect against flooding	N-6

Action Item		Goals Achieved
16	Continue to pursue land acquisition, building relocation or demolition, and open space preservation in special flood hazard areas.	N-6
17	Coordinate land acquisition, zoning changes, development restrictions, and/or other regulatory tools as appropriate to reduce property damage from flooding.	N-6
18	Explore the revision of the Building Code (LCL Title 22) by the more widely used International Building Code (IBC).	N-6
19	Expand Stommish Grounds.	C-1, LU-2
20	Identify and put in place regulations to protect scenic resources, such as Hales Passage and Lummi Shore Drive.	CD-4

LIBC

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Action Item		Goals Achieved
1	Real estate acquisition projects are informed by a resource protection strategy.	C-1
2	Work with community to identify the desired bene-fits from ownership of Loomis Golf Course. Consider benefits such as Lummi membership, youth programs, and economic potential.	ED-7, HW-4
3	Expand active recreation programs for youth in-volvement. Utilize resources at Community Fitness Center and Loomis Trail Golf Course to engage young Tribal members.	YE-2, HW-4
4	Create a Tribal department focused on the creation and management of a parks system that serves all community members.	HW-4, PR-1
5	Manage Portage Island access	PR-1
6	Create a Parks and Recreation Department	PR-1, HW-4

Public Works

Action Item		Goals Achieved
1	Develop a set of design guidelines for architecture and development which align with Lummi values.	C-1, LU-2
2	Continue to explore the provision of natural gas service on the Reservation.	ED-3
3	Conduct a code audit to identify barriers to mixed-use and multi-family development and identify areas where the zoning and related regulations need updates such as to the Permitted Uses Table or other areas.	LU-1
4	Use capital improvement planning to ensure infra-structure planning supports development opportunities	LU-2
5	Develop a Stormwater Masterplan to guide storm-water infrastructure development.	LU-2
6	Complete the planned road improvement projects.	T-1
7	Implement system for easy reporting of road maintenance issues, such as a 311 hotline or online maintenance request form	T-1
8	Improve and expand the trail and sidewalk network through new construction, expansion, re-placement, maintenance, or repair.	T-5
9	Investment options should be evaluated for their benefit across generations and abilities, favoring programs and facilities that function well for inter-generational recreation	PR-3
10	Host public events to promote volunteerism and maintenance of open space (i.e. Litter pick-up parties)	PR-5
11	Inform the public about the public and environmental costs of vandalism of parks and open space facilities.	PR-5
12	Encourage the public to report vandalism and other necessary park repairs.	PR-5

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Sovereignty & Treaty Protection

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	Action Item	Goals Achieved
1	Develop a prioritization list of burial site protections needed and develop a strategy to implement.	C-1
2	Engage proactively in off-Reservation cultural re-source management	C-2
3	Participate in the federal Section 106 Review pro-cess.	C-2
4	Monitor and track fee land properties for sale within the Reservation.	LU-5
5	Identify staff capacity for a point person to address legal barriers to land ownership for tribal members.	HH-4
6	Raise property rights awareness among Lummi peo-ple and explain necessary steps to reclaim land.	HH-4

Youth Social Services

Action Item		Goals Achieved
1	Develop a curriculum and standard for students who participate in culture classes.	C-3
2	Integrate vocational training within secondary school curriculum.	ED-1
3	Expand active recreation programs for youth in-volvement. Utilize resources at Community Fitness Center and Loomis Trail Golf Course to engage young tribal members.	PR-2, YE-2, HW-4
4	Leverage Loomis Golf Course as a community asset for active recreation	PR-6, ED-7, HW-4
5	Create a home visiting program to the community that emphasizes social emotional development and allows more families to access additional supports and resources.	YE-1
6	Ensure that students have affordable options for before or after-school programs that encourage academic performance.	YE-2
7	Expand active recreation programs for youth in-volvement. Utilize resources at Community Fitness Center and Loomis Trail Golf Course to engage young tribal members.	YE-2, PR-2, HW-4
8	Identify secondary students at-risk for dropout and provide mentorship for continuation.	YE-4
9	Integrate drug awareness and training curriculum into Lummi Nation schools.	HW-2, JS-2
10	Newly acquired golf course introduces youth sports programming as well as discounted membership opportunities for tribal adults and families.	HW-4, PR-6, ED-7
11	Increase awareness among students at Lummi Na-tion School and NWIC of sexual violence threats and resources available for reporting, protection, and counseling.	JS-1
12	Provide information at after school or other youth programs that can help young people recognize or get help with domestic violence, especially dating violence.	JS-1
13	Reinstitute a family court to put in place customary adoptions.	JS-1
14	Preventative programs focusing on drug use are incorporated into the Lummi Nation School.	JS-2, HW-2

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Education

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	Action Item	Goals Achieved
1	Invest in early childhood Lummi language programs to strengthen, self-esteem, identity, and community connectedness.	C-3, YE-1
2	Continue to incorporate Xwlemi Chosen (Lummi language) and values into curriculum at Lummi Nation School and NWIC.	C-3, YE-3
3	Offer Xwlemi Chosen classes in a range of fluency levels and approaches (written, spoken, oral, physical).	C-3
4	Focus on creating language skills through the use of language with practical activities, cultural activities, and family relationships.	C-3
5	Expand access to daycare services by acquiring the NWIC daycare or use veteran's hall for expansion.	ED-1, YE-2
6	Integrate vocational training within secondary school curriculum.	ED-1
7	Consider a comparable wage/salary/retirement/pension Plan for Lummi Nation School teachers to improve retention.	ED-1
8	Encourage students along tracks that lead to higher education, with programs such as Running Start and Native Pathways.	ED-1
9	Develop programming through secondary school and NWIC that directs talent toward available career opportunities.	ED-5
10	Coordinate with Head Start on services for early learning.	YE-1
11	Create a home visiting program to the community that emphasizes social emotional development and allows more families to access additional supports and resources.	YE-1
12	Conduct community engagement and outreach events focused on social emotional development and parenting, such as activities for children 0-3 years old and their caregivers conducted by home visitors, and events for expectant families.	YE-1
13	Establish partnerships and collaboration across Lummi Nation departments to create early-childhood focused connections between behavioral health, community health, early care and education.	YE-1
14	Invest in early childhood Lummi language programs to strengthen, self-esteem, identity, and community connectedness.	C-3, YE-1
15	Partner with local school districts and non-tribal entities to align and improve supports for families.	YE-1
16	Engage with community members to identify locations for additional drop-off daycare centers in the community.	YE-2

Action Item	Goals Achieved
17 Identify potential leaders of daycare centers and connect these individuals to training and seed fund-ing needed to develop a quality network of com-munity childcare.	YE-2, ED-2
18 Consider a comparable wage/salary/retirement/ pension Plan for Lummi Nation School teachers to improve retention.	YE-3
19 Work with families to identify causes for student absenteeism. Develop targets to ensure that all youth are attending school regularly.	YE-3
20 Increase access to technology for students at Lummi Nation Schools.	YE-3
21 Use Washington State testing metrics to develop focus areas for improvement relative to neighbor-ing primary and secondary school districts.	YE-3
22 Integrate programs that teach test-taking skills for primary and secondary students.	YE-3
23 Expand Lummi language programs to strengthen, self-esteem, identity, and community connectedness.	YE-3, C-3
24 Connect students and parents to information about scholarships and financial aid available for NWIC degree programs.	YE-4
25 Identify secondary students at-risk for dropout and provide mentorship for continuation.	YE-4
26 Integrate drug awareness and training curriculum into Lummi Nation schools.	HW-2, JS-2
27 Partner with the Lummi Nation School to involve students in gardening programs which correlate with nutrition training.	HW-3
28 Work with youth and school cafeterias to encour-age healthy eating practices at an early age and incorporate traditional foods onto the local school menu.	HW-3
29 Increase awareness among students at Lummi Na-tion School and NWIC of sexual violence threats and resources available for reporting, protection, and counseling.	JS-1
30 Provide information at after school or other youth programs that can help young people recognize or get help with domestic violence, especially dating violence.	JS-1
31 Preventative programs focusing on drug use are incorporated into the Lummi Nation School.	JS-2, HW-2

Lummi Economic Development Division

PERFORMANCE INDICATORS

- Metric 1
- Metric 2
- Metric 3

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	Action Item	Goals Achieved
1	Initiate subarea planning for Gooseberry Point and the I-5 properties, with a strong economic development focus.	ED-1
2	Improve the marine infrastructure at Gooseberry Point, including modernization of boat launching facilities.	ED-1, T-6
3	Explore the creation of a seafood processing plant.	ED-1
4	Consider building a cold storage.	ED-1
5	Consider a comparable wage/salary/retirement/pension Plan for Lummi Nation School teachers to improve retention.	ED-1
6	Create a career technology center to address the need for vocational training for family-wage jobs.	ED-1, YE-5
7	Create training programs, in partnership with or with employer input, for occupations expected to grow.	ED-1
8	Leverage Opportunity Zone status to attract business investment on the Reservation.	ED-1
9	Identify resources which specifically promote businesses in desired industries, such as food service and agriculture or daycare providers.	ED-2, YE-2
10	Create formal and informal agreements such as Memoranda of Understanding and interagency procedures to guide coordination between tribal and county planning agencies.	ED-3
11	Through public-private partnerships, connect with local employers to understand occupations in demand, and discuss necessary skillsets for success in occupations that pay family wage salaries.	ED-5, YE-5
12	Develop programming through secondary school and NWIC that directs talent toward available career opportunities.	ED-5
13	Partner with company leadership to ensure that skills training aligns with Silver Reef Casino Resort & Loomis Golf Trail needs.	ED-7
14	Develop Economic Development nodes at the commercial center along Slater Road and the newly acquired I-5 properties.	LU-4
15	Allocate land to economic development programs and projects likely to provide job opportunities for tribal members.	LU-4
16	Promote a Natural Resources-based economy by identifying and protecting sites for perpetual harvest of timber or non-timber forest products.	LU-4
17	Coordinate housing, workforce development, and healthcare services to connect tribal members experiencing homelessness with needed support structures.	HH-3

Action Item		Goals Achieved
18	Improve the marine infrastructure at Gooseberry Point, including modernization of boat launching facilities.	ED-1, T-6
19	Consider a comparable wage/salary/retirement/ pension Plan for Lummi Nation School teachers to improve retention.	YE-3
20	Increase participation in college-preparedness pro-grams such as Native Pathways to College and Running Start.	YE-4
21	Create a career technology center to address the need for vocational training for family-wage jobs.	ED-1, YE-5
22	Provide a venue, such as a farmer’s market, to sell and trade fresh foods.	HW-3
23	Rehabilitation programs integrate both counseling services and job training to provide alternative pathways.	JS-2

CDFI

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	Action Item	Goals Achieved
1	Explore the creation of a seafood processing plant.	ED-1
2	Consider building a cold storage.	ED-1
3	Consider opportunities to utilize FTZ status, given changes to national trade policy.	ED-1
4	Leverage Opportunity Zone status to attract business investment on the Reservation.	ED-1
5	Connect entrepreneurs with available financial re-sources through local CDFI, ONABEN, USDA Rural Business Development Grants, Western Washington's Small Business Development Center or other organi-zations focusing on small business development, na-tive businesses, or rural investment.	ED-2
6	Support entrepreneurship on the Reservation by operating a business incubator site where tribal members can spend 3-5 years growing a business with access to resources and low overhead costs.	ED-2
7	Collaborate with Lummi CDFI on improving credit and access to capital for housing for tribal members.	HH-2
8	Identify potential leaders of daycare centers and connect these individuals to training and seed fund-ing needed to develop a quality network of commu-nity childcare.	YE-2, ED-2

Office of Economic Policy

Action Item		Goals Achieved
1	Integrate vocational training within secondary school curriculum.	ED-1
2	Create a career technology center to address the need for vocational training for family-wage jobs.	ED-1, YE-5
3	Consider opportunities to utilize FTZ status, given changes to national trade policy.	ED-1
4	Work with community members to create a Lummi Living Wage definition and action strategy.	ED-1
5	Support entrepreneurship on the Reservation by operating a business incubator site where tribal members can spend 3-5 years growing a business with access to resources and low overhead costs.	ED-2
6	Identify resources which specifically promote busi-nesses in desired industries, such as food service and agriculture or daycare providers.	ED-2, YE-2
7	Conduct needs analysis and identify funding for res-ervation-wide broadband access.	ED-3
8	Identify a quota for tribal shellfish fishers to sell to the Casino and restaurants.	ED-7
9	Create a career technology center to address the need for vocational training for family-wage jobs.	ED-1, YE-5

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NWIC

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Action Item		Goals Achieved
1	Encourage students along tracks that lead to higher education, with programs such as Running Start and Native Pathways.	ED-1
2	Leverage Opportunity Zone status to attract business investment on the Reservation.	ED-1
3	Through public-private partnerships, connect with local employers to understand occupations in de-mand, and discuss necessary skillsets for success in occupations that pay family wage salaries.	ED-5, YE-5
4	Through public-private partnerships, connect with local employers to understand occupations in de-mand, and discuss necessary skillsets for success in occupations that pay family wage salaries.	ED-5, YE-5
5	Develop programming through secondary school and NWIC that directs talent toward available career opportunities.	ED-5
6	Connect students and parents to information about scholarships and financial aid available for NWIC degree programs.	YE-4
7	Engage community and local historians to gain histor-ic and modern knowledge on nutrition and food practices.	HW-3

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Action Item		Goals Achieved
1	Create training programs, in partnership with or with employer input, for occupations expected to grow.	ED-1
2	Partner with company leadership to ensure that skills training aligns with Silver Reef Casino Resort & Loomis Golf Trail needs.	ED-7
3	Develop public-private partnerships to align training programs with the technical skills required by re-gional employers.	YE-5, ED-5

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Transportation

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Action Item		Goals Achieved
1	Expand access to regional job centers through innovative on-demand transit services, such as VanPool.	ED-3, T-2
2	Create a Master Pedestrian Plan for the Reservation. Create paths within and between Village nodes.	LU-3, T-3, HW-4
3	Consider a trail network connecting east to west across the Reservation. Trails could run along Slater Road, N Red River Road, and Smokehouse Road.	LU-3, T-3, PR-4
4	Complete the planned road improvement projects.	T-1
5	Implement system for easy reporting of road maintenance issues, such as a 311 hotline or online maintenance request form	T-1
6	Identify funding opportunities for projects that enhance connectivity within and between residential villages, job centers, and public amenities.	T-1
7	Extend hours of service and increase frequency on existing public transportation lines.	T-2
8	Expand access to regional job centers through innovative on-demand transit services, such as VanPool.	ED-3, T-2
9	Explore first- and last-mile solutions for access to fixed route service.	T-2
10	Create Pedestrian Master Plan. Identify missing links in the existing pedestrian network to connect important destinations and complete routes.	T-3, LU-3, HW-4
11	Establish a Safe Routes to Schools program to improve pedestrian safety and encourage active transportation.	T-3, JS-3
12	Collaborate with Whatcom County on the development of the regional trail system including the trails through Renton.	T-3, PR-4
13	Design the Pedestrian Master Plan to minimize conflicts, street crossings, and travel along high speed, high traffic streets.	T-4, JS-3
14	Reduce speed limits to meet safety guidelines from Vision Zero. On Haxton Way, reduce 50 mph speeds to 35-45 mph, more consistent with the rest of the corridor. Kwina Road speed limit reduced to 25-30 mph to acknowledge new residential and mixed-use developments.	T-4, JS-3
15	Promote pedestrian safety, especially on shared roadways, by increasing awareness among the driving public.	T-4
16	Improve and expand the trail and sidewalk network through new construction, expansion, replacement, maintenance, or repair.	T-5

Action Item	Goals Achieved
17 Offer flexible incentives and tools to make pro-gress towards ultimate system design for the Pedes-trian Master Plan.	T-5
18 Use feasibility study to advocate for highest and best use at Fisherman's Cove and Gooseberry Point in negotiations with Whatcom County.	T-6
19 Pursue relocation of ferry terminal and harbor re-development, prioritizing the needs of Lummi Island residents, traffic safety, and long-term mobility benefits for the community.	T-6
20 Coordinate trail concepts with Pedestrian and Bike Master Plan	PR-4, T-3, LU-3
21 Develop an interconnected trail system allowing residents to walk or bike to local destinations.	HW-4, PR-4, LU-3
22 Reduce speed limits to meet safety guidelines from Vision Zero. On Haxton Way, reduce 50 mph speeds to 35-45 mph, more consistent with the rest of the corridor. Kwina Road speed limit reduced to 25-30 mph to acknowledge new residential and mixed-use developments.	JS-3, T-4
23 Establish a Safe Routes to Schools program to im-prove pedestrian safety and encourage active transportation.	T-3, JS-3
24 Design the Pedestrian Master Plan to minimize con-flicts, street crossings, and travel along high speed, high traffic streets.	JS-3, T-4

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15 REFERENCES

- Bellingham Herald. On Lummi Reservation, turning to 100 tiny homes to shelter tribal homeless. August 30, 2017, updated September 1, 2017. <https://www.bellinghamherald.com/news/local/article170130267.html>. Accessed June 2019.
- Lummi Indian Business Council. Lummi Community Plan. March 2005 and Revised 2010 Update.
- Lummi Indian Business Council. Lummi Nation Atlas. March 2016.
- Lummi Indian Business Council. Lummi Visions 2055: Envisioning the Future of the Lummi Reservation Community. Draft 01/15/03.
- Lummi Indian Business Council. http://www.lummi-nsn.org/DotOrg_Old/website/dept_pages/culture/schelangen.shtml. Accessed September 2019.
- Lummi Planning Department. Comprehensive Land Use Plan. September 2015.
- Lummi Planning Department. Needs Assessment for Land Use Planning and Development of the Lummi Nation. February 22, 2013.
- Lummi Stepping Stones. <http://lummisteppingstones.org/>. Accessed June 2019.
- Robert Woods Johns Foundation and the University of Wisconsin. Population Health Institute. 2019 County Health Rankings Key Findings Report. <https://www.countyhealthrankings.org/reports/2019-county-health-rankings-key-findings-report>. Accessed June 2019.

- Urban Indian Health Institute: Our Bodies, Our Stories. November 14, 2018. <https://www.uihi.org/projects/our-bodies-our-stories/>. Accessed September 2019.
- Urban Institute: Urban Wire Housing and Housing Finance. Mortgage lending in Indian Country has jumped, but land policies remain a barrier. April 20, 2017. <https://www.urban.org/urban-wire/mortgage-lending-indian-country-has-jumped-land-policies-remain-barrier>. Accessed June 2019
- US Census Bureau. Census Reporter. <https://censusreporter.org/profiles/06000US5307391760-lummi-Reservation-ccd-whatcom-county-wa/>. Accessed June 2019.
- US Census Bureau. My Tribal Area. <https://www.census.gov/tribal/?st=53&aianihh=2070>. Accessed June 2019.
- US Department of Agriculture. Economic Research Service. <https://www.ers.usda.gov/data-products/food-access-research-atlas/go-to-the-atlas/>. Accessed September 2019.
- US Department of Housing and Urban Development. Housing Needs of American Indians and Alaska Natives in Tribal Areas: A Report from the Assessment of American Indian, Alaska Native, and Native Hawaiian Housing Needs. January 2017.
- Washington State Department of Commerce. Opportunity Zones. <https://www.commerce.wa.gov/growing-the-economy/opportunity-zones/>. Accessed September 2019.
- Whatcom County Coalition to End Homelessness. A Home for Everyone: 2019 Annual Report. May 2019.