



LUMMI INDIAN BUSINESS COUNCIL

Comprehensive Economic Development Strategy

5-Year 2018-2022 | 2021 Update

Prepared by Teresa Taylor, Project Manager, Office of Economic Policy 04/30/2021.

"We are Lummi. We are Coast Salish people with a rich history, culture, and traditions. We are fishers, 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."

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Executive Summary

The beginning of 2020 brought a new challenge and an uncertain future to the Lummi Indian Reservation. A raging pandemic – unleashed by a highly contagious COVID-19 virus - has placed hardships on communities, disrupted lives, livelihoods, and businesses worldwide. The COVID-19 pandemic has disrupted normal modes of working, socializing, dining, and travelling. The behavior of citizens has changed since the coronavirus pandemic hit the world.

The Lummi Indian Business Council (LIBC) has remained committed to providing resources and relevant news to help tribal members serve their business community during the COVID-19 outbreak and in the economic recovery efforts.

Activities include:

- LIBC has worked hard to minimize the impact on public health and to limit disruptions.
- With the economic issues that we are facing for the next few years as a result of the COVID-19 pandemic, LIBC is developing an Economic Recovery & Resiliency Plan that will assess and address immediate needs and long-term recovery.
- To aid in the coronavirus recovery effort, LIBC offered \$1.5 million of CARES & ARPA funds for Small Business Interruption Grants to support businesses with recovery.
- LIBC adopted a work from home practice which resulted in increased services conducted via phone, email, video conference and social media usage.
- LIBC recognized the need for broadband and connectivity as students were forced to attend school remotely, and as employees were forced to work from home.

The CEDS is a document that should be used as a guide to understand the regional economy and to improve it. It is critical that continuous lines of communication and outreach continue with the general public, government decision makers, and business investors.

Goals for the year:

- Help expand broadband
- Business pandemic recovery
- Mitigate economic impacts
- Retention of businesses and workers
- Workforce Development support
- Online business license
- Encourage entrepreneurship
- Improving access to financial resources needed to start and maintain a business

The following report provides a description of current economic and demographic conditions of the region, a SWOT analysis, an analysis of industry clusters, and lists the economic development goals and objectives and projects developed by the Tribe.

Introduction

We are the Lhaq'temish

Since time immemorial, the Lummi has been a fishing community. We built a subsistence-based culture and economy by following the resources of the land and sea, which have sustained us for thousands of years. Our Anthem, “Che Shesh Whe Wheleq”, meaning “survivors of the flood”, tells us that our ancestors survived the Great Flood and that we, the Lummi People, have adapted over thousands of years to prosper and evolve with the times. Today we manage 13,000 acres on the Lummi Reservation, operating aquaculture, business, and programs that benefits a population of 5641 Lummi Tribal Members, our neighbors, and northwest Washington.

Fostering Success through Education and Training

The Lummi Nation has worked for decades to increase educational opportunities as a means of fighting poverty and building self-sustainability among our people. The Lummi Indian School of Aquaculture and the Lummi Community College were early programs that sought to increase the skill base in our community. Presently, and as a testament to our community vision and commitment, the Lummi Nation operates the only accredited, four-year tribally chartered college in the Northwest region – the Northwest Indian College.

Strengthening the Regional Economy

The Lummi People have always been fishers. The Lummi Nation draws many business values from our long history of fishing, trading, and sharing of the catch. Since 1988 the Lummi Nation has built a foundation of self-governance, which has set the stage for a prosperous future.

The Lummi Nation is now one of the [largest employers in Whatcom County](#). We are working locally, regionally, and nationally to create a more favorable climate for environmentally sustainable businesses that provide living wage jobs.

Partnering for Prosperity

At our Lummi Nation Tribal Administration Building, we honor our nation’s history with artwork that showcases the village and long houses in our territory at the time of the 1855 Point Elliott Treaty.

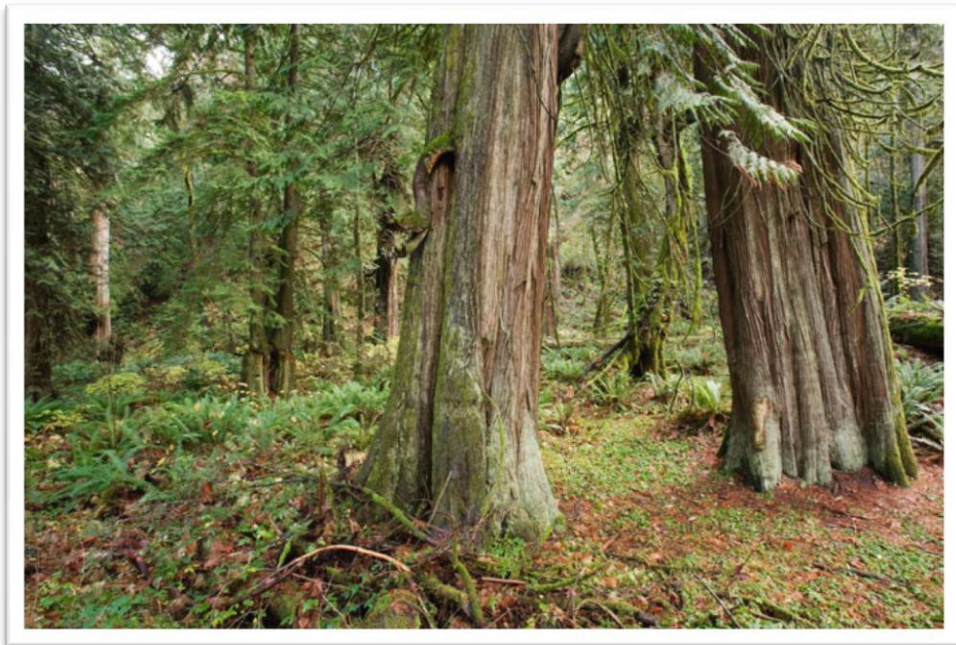
Represented among the image is the reef net, which is an invention of our Lummi ancestors, who used it to make Lummi a prosperous nation.

The reef net is dependent upon two canoes to harvest salmon, a partnership arising out of shared goals. In the same spirit, the Lummi Nation today seeks partnerships with those who are committed to bringing prosperity to northwest Washington.

A. CEDS Planning Process

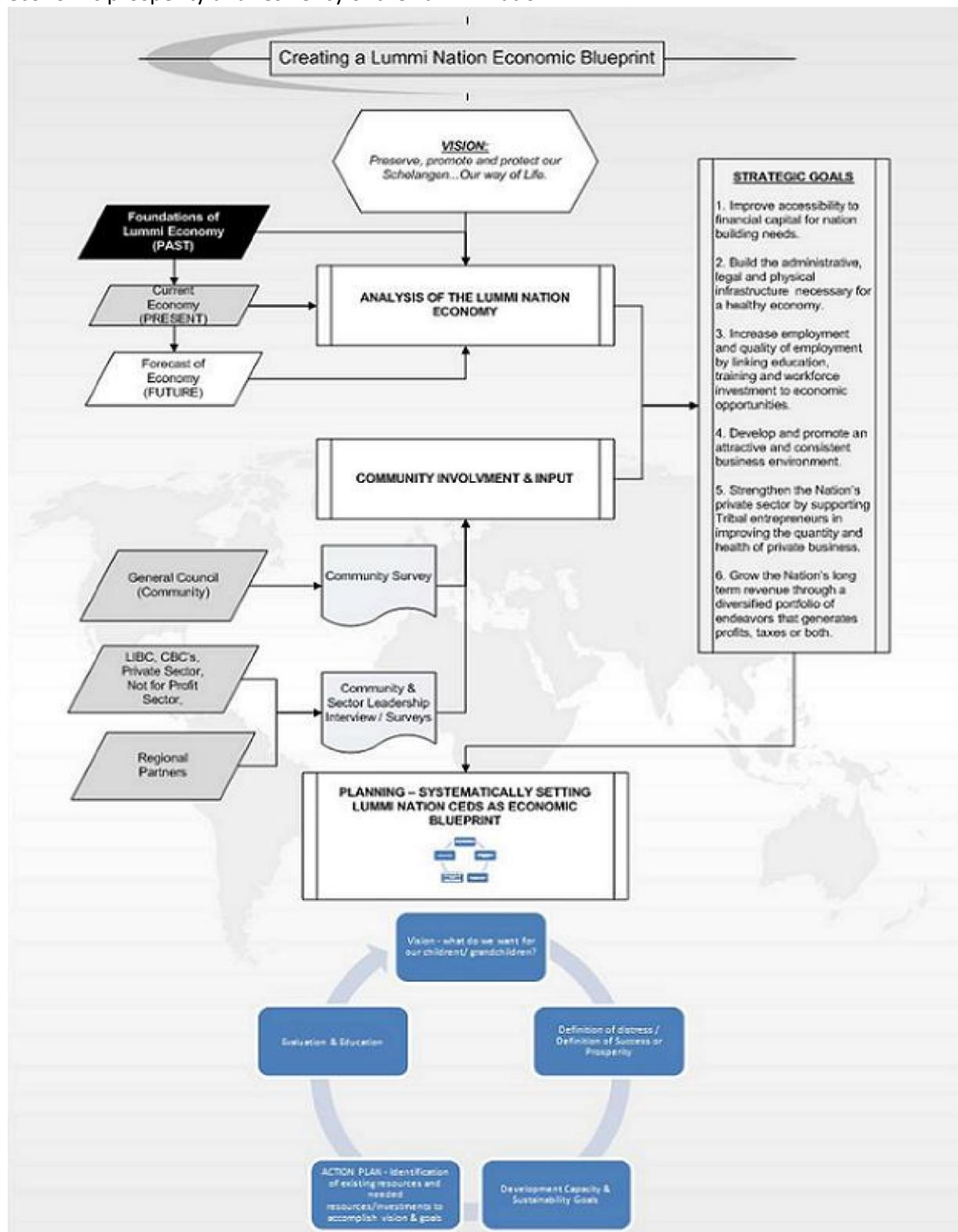
A.1 Philosophical and Legal Basis for Lummi Nation CEDS

The purpose of this process pursuant to [42 U.S.C. § 3162](#) and [13 C.F.R. Chapter III, Part 303, Section 303.7](#), the Comprehensive Economic Development Strategy (CEDS) is designed to bring together the public and private sectors in the creation of an economic roadmap to diversify and strengthen the regional economy. The CEDS should analyze the regional economy and serve as a guide for establishing regional goals and objectives, developing, and implementing a regional plan of action, and identifying investment priorities and funding sources.



A.2 Process for this CEDS

The CEDS is the result of a regionally-owned planning process designed to build capacity and guide the economic prosperity and resiliency of the Lummi Nation.



A.3 CEDS Committee

The Business, Planning and Economic Oversight Committee, as approved by LIBC Resolution 2020-030 of the Lummi Indian Business Council, acts as the CEDS Committee, and approves the CEDS and annual updates.

The Oversight Committee represents all the major interest of the local community and reflects the diverse goals to be realized, directly and indirectly, through implementation of the action plan. As the initial efforts are carried out and subsequent annual action plans are drafted, representatives from future interest groups will be identified and encouraged to participate. The public and private sector interests represented in the composition of the CEDS Committee demonstrate the widespread commitment to the development of the Lummi Nation economy.

The Oversight Committee delegates the line-work of compiling and drafting the annual CEDS updates to the staff of the Office of Economic Policy. Primary data is gathered through periodic surveys, by interviews with elected officials, various tribal government staff, local businesses, community oversight groups, and resident tribal members. Secondary research is collected through traditional means of official reports and contracted analysis from third party analysts.

A.4 Economic and Business Development

The Lummi tribal government, their business enterprises, their members, and firms that want to do business on the Lummi Indian Reservation all account for the contribution of economic and business development.

Lummi Commercial Company

The Lummi Commercial Company (LCC) was established by LIBC Resolution 2000-120, to maintain and operate Lummi Nation owned retail and commercial for-profit enterprises as delegated by the LIBC; to generate revenue for the strengthening of tribal self-government; to develop business expertise in the management and administration of tribal retail and commercial enterprises; and to enhance employment opportunities for tribal members.

	TOTAL	Lummi	Other Tribal	Non-Tribal
Lummi Commercial Company Admin	15	15	0	0
		100%	0%	0%

LCC Employee Status Data, as of November 2020

Business Cluster: Gooseberry Point

The Lummi Nation purchased the Gooseberry Point property in the mid-1980's. Since then the Tribe has used the property for several successful business and government ventures, some of which continue to operate at Gooseberry Point while others have been relocated. The highest and best use of the area would be to expand the existing marine activities for public service and private business use.

Today one of the greatest inefficiencies plaguing the commercial fishers that use Gooseberry Point is the antiquated boat launch, which needs to either be updated or replaced with a marina. A marina at Gooseberry Point would immediately create jobs through increased efficiency while also providing a safe harbor to recreational and government vessels. Vessels stationed at the marina can also provide emergency transit in times of flooding. The precursor to the marina is completing the studies necessary for funding. The alternative, updating the boat launch, could be accomplished through modernizing of the construction materials used in the dock. This option would also increase efficiency and result in faster time into the water and hard-dollar cost savings for local commercial fishers.

Similarly, another piece of antiquated equipment impeding job growth is the ice machine. A commercial ice machine and backup service capable of providing sufficient ice within 24-hours' notice to the regional fishers, including the Lummi fishing fleet, would immediately bring more job activity to Gooseberry Point. Estimated cost is \$1,500,000.

It is estimated that over two-hundred fishers have been dislocated due to the ever-thinning margins of commercial fishing. Approximately, an additional two-hundred current fishers are at risk of being displaced. All told, four-hundred jobs could be saved or created through modernizing the commercial fishing infrastructure at Gooseberry Point.



Figure 1 Gooseberry Point

Business Cluster: Legoe Bay

The Lummi Nation's real property at Legoe Bay on Lummi Island was the original site of the Lummi School of Aquaculture. The Aquaculture Program, now relocated to the mainland, employs a dozen workers who produce shellfish seed to grower around the globe. Because of Legoe Bay's location on the west side of Lummi Island, it is ideal for aquaculture and marine activities. However, the site no longer has the infrastructure needed for modern demands. Replacing the former dock at Legoe Bay is the necessary first step in revitalizing the site.



Figure 2 Legoe Bay on Lummi Island

Business Cluster: Salish Village

In 2012, the Lummi Nation acquired 170 acres of land near the existing Small Business Incubator Te'Ti'Sen. A partnership of private and public investment was able to bring infrastructure for water, sewer, road, and power to 27 acres of the site in 2020. The site was put to immediate use and 30 new jobs were created within months. Analysis has shown an additional two were brought to power, and related infrastructure needed to create jobs on the Lummi Nation lands adjacent to Interstate-5. Since the site is on the mainland side of the floodplain, development of the site ensures commerce can occur during flooding and significantly increasing the economic resiliency of the Lummi Nation.



Figure 3 Salish Village

Silver Reef Casino, Hotel & Spa



Figure 4 Silver Reef Casino

Since its opening day, the Silver Reef Hotel, Casino & Spa has added restaurants, gaming options, two hotel towers, and multi-use event space. The Steakhouse is regionally recognized as one of the best destinations and the hotel rates well with travel sites and advisors.

The Silver Reef Casino employment stats, as provided by SRC's Director of Human Resources, as of March 11, 2021 is as follows:

Table 1 Silver Reef Casino Employment Statistics

STATUS	Pre COVID19	Standby/ Furlough	Layoff	Returned	Reassigned
FULL TIME					
Lummi	101	81	3	75	5
Other	27	22	6	20	0
Non-Tribal	355	318	64	253	17
PART-TIME					
Lummi	19	21	4	12	0
Other	10	8	5	3	0
Non-Tribal	98	95	45	26	0
ON-CALL					
Lummi	2	2	1	2	0
Other	1	1	1	2	0
Non-Tribal	20	20	14	7	0
TOTAL	633	568	143	400	22
Note: 3 employees were retro terms, that is why there is 3 missing. 65 left for other reasons.					

The SRC generates revenues for essential government services.

The hotel has 206 rooms & suites, beautiful Mt. Baker views, complementary Silver Signature breakfast and Wi-Fi. The Diamond Executive floor level restricted access, is a private lounge with upgraded amenities, and home to Diamond, Ruby, Emerald & Sapphire specialty suites. All hotel rooms on the property are non-smoking and pets are not allowed.

There are restaurants & baristas located throughout the casino. The Steak House, Panasia, the Red River Café to name a few.



There are 15 table games including Blackjack, Craps, Spanish 21, Fortune PaiGow, Roulette, Three Card Poker, Four Card Poker, and the Ultimate Texas Hold’Em. A weekly Blackjack Tournament happens every Tuesday.

Technology is evolving in the gaming and hospitality space by stretching beyond its own boundaries, expanding its capabilities, and supporting operators with more of their daily tasks. Success is largely contingent on being able to access the guest data at a “microscopic” level.

	TOTAL	Lummi	Other Tribal	Non-Tribal
Silver Reef Casino	409	88	34	287
		21.5%	8.3%	70.2%

SRC Employee Status Data, as of November 2020

Loomis Trail Golf Course

In 2019, the Lummi Nation acquired the [Loomis Trail Golf Course](#) located in Blaine, Washington, one of the State’s five best golf courses. Loomis Trail Golf Course sits on approximately 180 acres of land within our *T’enexw*, our traditional territory. This property has cultural and historical significance to Lummi Nation. Acquiring this land and existing business would add to our current list of business entities and diversify our revenue sources, while providing jobs and training to our Lummi Tribal members. Loomis Trail Golf Course is a prestigious golf course with 18-holes, a 40,000 square foot club house, 15 hotel rooms, driving range, putting range, and located less than 5 miles of the U.S./Canada border.



Figure 5 Loomis Trail Golf

Lummi Bay Markets Logo

The Lummi Bay Logo was approved by the LCC Board on June 4, 2018. The brand has been adapted to the additional offerings of the Salish Village, MiniMart, and Fisherman’s Cove store. Lummi Bay Markets Logo and Brand Name will be kicked off with the opening of the new Fisherman’s Cove Store.



The Lummi Bay Market - Lummi Mini Mart



The Lummi Mini Mart, a convenience store and gas station, was established in 1995 and is located at the intersection of Haxton and Slater Roads.

The volume for fuel sales continues to grow – volatility in price impact revenues but net is strong. Growth in tribal sales has impacted net tax revenues.

	TOTAL	Lummi	Other Tribal	Non-Tribal
Lummi Mini Mart	26	18	4	4
		69%	15%	15%

LCC Employee Status Data, as of November 2020

Lummi Bay Market - Fisherman’s Cove Convenience Store

As part of the ongoing effort to return the Lummi Indian Reservation lands to Tribal ownership, the Lummi Nation purchased the Gooseberry Point property in 1986. Traditionally, the area is a part of the Nation’s working waterfront.

The Fisherman’s Cove Marina located along Hales Passage in the North Sound, at the tip of the Lummi Peninsula, is an important hub for transient or recreational boating, life-saving and marine enforcement, cruise vessel port-of-call, and commercial fishing, providing boat storage and services, fuel station, and offshore launching facilities. The marina began as a privately-owned facility in the 1950’s and is now owned and managed by the Lummi Nation.

Since the purchase, the Lummi Nation has endeavored to establish the working waterfront. To date, the Nation has invested in building a new convenience store and making better use of the waterfront and aquatic elements of the site.



Figure 6 Lummi Bay Market at Fisherman's Cove

The new 3,600 Sq Ft convenience store provides space for fresh foods and deli items, a selection of fisheries supplies, and a small kitchen/grill. The store carries three kinds of gasoline – regular, unleaded, and ethanol-free – as well as diesel. Any additional gas and cigarette tax revenues generated at this location will be in addition to that.

We are committed to providing a nice store for the community. This store will honor the history of this place as a traditional trading post, a traditional gathering place, and the hub for our fishing fleet. As we look to the future, the new store sets the state for future redevelopment of Gooseberry Point.

	TOTAL	Lummi	Other Tribal	Non-Tribal
Fisherman's Cove and Dock	25	19	5	1
		76%	20%	4%

LCC Employee Status Data, as of November 2020

2020:

- The Cove's market has historically been limited to the local community and the occasional tourists
- Even though the Cove sales have been impacted by the pandemic and the rescheduling of Stommish, the new store saw an increase of 5% or more across all categories in the first three quarters of 2020
- Much of the increase can be attributed to more product options and new local customers

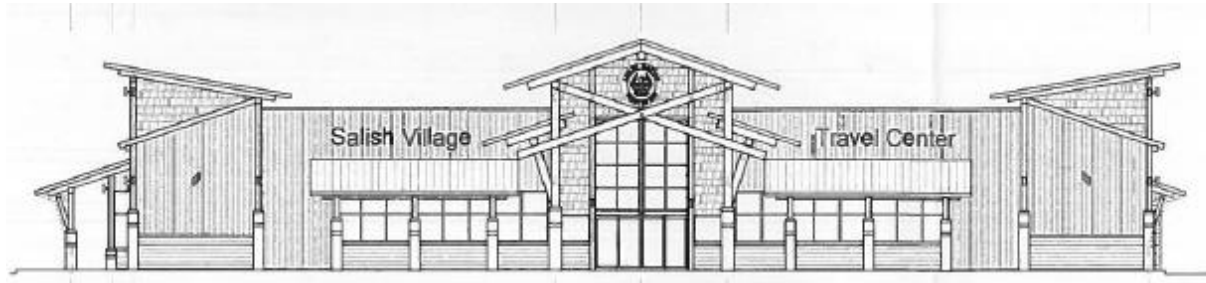
2021:

- In 2021, the Cove will pursue a new customer segment – boaters. In the Spring, the store will launch a marketing campaign advertising the fuel price, which in some cases 50 cents/gallon cheaper than competitor fuel docks.
- To compliment boat fuel sales, the store will offer more marine supply products.

- Existing grocery products will be reassessed for profitability
- Food services will be improved
- The goal of these efforts is to sell an additional \$60K gallons during boating season and increase food service by \$15K on the year.

Salish Village Travel Center/Fueling Station

The new 10,000 sq ft convenience store will also carry the Lummi Bay Market logo and brand, with 12 retail fuel pumps, and truck stop amenities.



	TOTAL	Lummi	Other Tribal	Non-Tribal
Lummi Bay Market @ 260	41	22	11	8
		63%	21%	17%

LCC Employee Status Data, as of November 2002

2020:

- July 2019 saw 384,000 Canadian cars enter the U.S. at the Blaine Border Crossing. Because of COVID-19, in July 2020 it was just 14,800 cars – a 96% drop and roughly 60% of the traffic passing by the Exit 260.
- The LCC is creating signage, improving web presence, and utilizing paid advertising to create overall market awareness of the new 260 store.
- In April, the truck traffic at the three border crossings (Blaine, Sumas, Lynden) was down 23% of seasonally adjusted pre-COVID levels. By July the number had improved to -8%.
- The Truck Stop uses a three-prong strategy of (1) local and regional signage; (2) cold-call selling of fleet accounts to local companies; and (3) national web presence aimed specifically at truckers. Examples of web presence includes trucker apps, websites, and social media that'll increase trucker awareness of the 260's low price diesel.

2021:

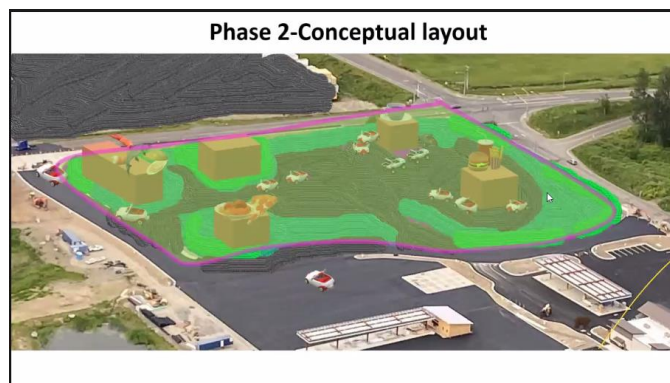
- In 2021, the focus will be on the competition. Specifically, acquiring the competition's customers. Between the border and Bakerview Road, there are approximately nineteen gas stations serving I-5 travelers. Those nineteen stations (and Jordan's) are the primary retail competition for Lummi Bay Market at Exit 260.
- Through marketing campaigns encouraging customers to compare (1) price; (2) product selection; and (3) convenience. The 260 will increase the number of first-time customer visits. Included in those first-time visits will be post-COVID Canadians.

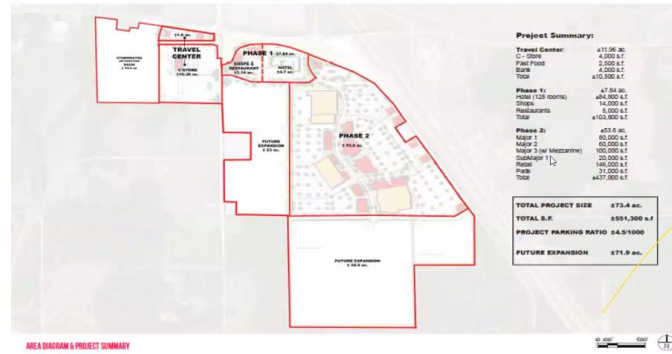
- 2021 will continue to use the same three-prong strategy. The intent of this effort is to increase daily traffic ten trucks every thirty days and reach the traffic goal of 146 trucks/day by December 2021.

Visit us at www.exit260.com

Phase II: Salish Village

- 160 acres of Trust property
- About 100-120 acres are available for development
- Retail outpads – developable area for up to 5 outpads
- Utilities are readily available
- Suitable for mixed use retail
- Prefer to lease the space to tenants that will complement the LBM@260





Next steps:

- Tenant recruitment for the phase 2 development area
- Predevelopment work that needs to be conducted on the East property
- Survey and studies to identify the buildable property which helps guide site plans
- Secure utility access for the east properties
- Environmental analysis needed – to work with Planning and Natural Resources
- Install the stormwater pad under the asphalt
- Identify funding for the development – either lease raw land or buildings
- Permitting

Lummi Nation Holding Company (aka Lummi Nation Development Company)

Despite the special privileges the Lummi Tribe can exercise through federally chartered corporations like the Lummi Development Holding Company, this does not guarantee any degree of economic development or prosperity.

The goal was to develop several self-reliant companies that provide a continuous revenue stream to the Lummi Nation, while consuming a minimum of LIBC resources – both financial and management.

Successfully obtaining, implementing, and competing Federal government contract for on or off reservation commercial business ventures requires increasingly specialized expertise and with the capacity to react quickly to changing customer needs and demands.

The LIBC believed it to be in the best interest of the Lummi Nation to create an enhanced corporate structure that shall encourage the development of efficient and successful professional management of its subsidiary business/commercial entities, while at the same time ensuring that ultimate ownership and control of each entity retained by the LIBC.

LIBC is charged with the fiduciary responsibility of developing the economic and commercial success of the Nation for the Lummi people and must select and hire economic leadership that shall create a healthy business atmosphere and community for the long term health of the Nation, selecting leadership of the highest caliber and integrity possible. Committed to building enduringly successful organizations that shall succeed in perpetuity and to sustain a deep sense of purpose that shall be true to the LIBC core values while recognizing the importance of their service to the Nation by building sustainable economic/commercial growth, tribal and private entrepreneurship, that will financially reward tribal members for business success, and create job opportunities, and stimulate economic multiplier growth positive to tribal self-determination.

Pursuant to Title 26 of the Lummi Code of Laws, the Lummi Nation Development Company, LLC was created for the purpose of pursuing Federal, State and Tribal government and commercial contracts conducive to stimulating on or off reservation commercial business development with enhanced opportunities.

The LIBC Resolution 2009-064 authorized the creation of a Lummi Nation Holding Company. The Board of Directors were selected by LIBC Resolutions 2008-060 and 2009-114.

The Lummi Nation Development Company Operating Agreement shall provide for monthly distributions to LIBC in such amounts as the Management Board shall deem reasonable and appropriate given the holding companies continuous research and development, budgets, financial status and any necessary realignment of risk to financial returns and retained earnings requirements, taking in consideration standard banking and bonding covenants, proposed new ventures and partnership agreements, growth or other investments, and other financial reasonable needs of the respective business ventures or entities.

A.5 Workforce, Education and Training

Tribal Employment Rights Office

The Tribal Employment Rights Office (TERO) advocates for equal opportunities for Lummi Nation Community members against employment discrimination and for Indian Preference in LIBC and its subsidiary entities and organizations contracts and sub-contracts. In addition to referring qualified tribal members for employment and training, this Office develops and maintains a cooperative working relationship with contractors and subcontractors while working under the guidelines of the TERO Ordinance ([Lummi Nation Code of Laws Title 25](#)).



Workforce Development Services

The Workforce Development Services provides access to training and developing partnerships with training institutions and employers to empower job seekers to make effective training and career choices based on realistic self-assessment and comprehension of the world of work, resulting in self-sufficiency and achievement of life-long success.

Northwest Indian College

[Northwest Indian College](#) (NWIC) is a tribal college with a baccalaureate level of accreditation with a focus on meeting the higher educational needs of the tribal communities of the Pacific Northwest. The mission of the College is: “Through Education, Northwest Indian College promotes indigenous self-determination and knowledge”. NWIC’s main campus is located on the Lummi reservation, with six (6) remote tribal sites at Swinomish, Tulalip, Port Gamble S’Klallam, Nisqually, Muckleshoot, and Nez Perce; throughout the states of Washington and Idaho.

The Northwest Indian College (NWIC), headquartered on the Lummi Indian Reservation, is the only accredited tribal college in Washington and Idaho, and is also one of 32 accredited tribal colleges nationwide. The college strives to meet the higher education needs of Native American people who live in the Pacific Northwest through diverse programs of study offered in various formats. NWIC offers Associates of Arts and Sciences and Bachelor’s degrees to students from throughout the nation. The NWIC also provides vocational training and a Business Assistance Center (BAC), which has links with the Small Business Administration (SBA), offering entrepreneur mentoring. They also have an American Indian Business Leaders (AIBL) Chapter that travels to business competitions and conferences. The educational philosophy of Northwest Indian College is based upon the belief that the opportunity of post-secondary education must be provided within the Native American community. Northwest Indian College is committed to the belief that self-awareness is the foundation necessary to achieve confidence, esteem, and a true sense of pride; build a career; create a “self-sufficient” lifestyle; and promote life-long learning. It is also committed to the belief that a self-awareness program must include a study of Native American culture, values, and history.

Within the past year, the LIBC Office of Economic Policy has renewed the dialogue with the BAC and plans to become more involved in determining the scope of services provided to entrepreneurs.

Sovereignty It is recognized that Native American (Indian) Tribes are inherently sovereign nations, who possess both the inherent and acquired rights to govern themselves, their traditional homelands, and their natural resources. Contemporarily, Tribes find themselves in the position to provide a broader range of culturally specific, social, and economic programs, to their respective citizens.

Leadership The Tribal Governance and Business Management (TGBM) Program aspires to train future Tribal leaders and managers of Native American (Indian) communities through the pursuit of coursework specific to the exploration of the traditional, historic, and contemporary importance of sovereignty, ethics, administration, management, economic development and leadership.

Management and Administration Although management and administration are implicitly Western terms, they are ideologies by which tribal people have governed themselves throughout their respective and/or collective, inherent tribal histories. Therefore, it stands to be within reason that contemporary tribal communities regularly engage in the effective implementation of organizational and administrative structures, business management and financial decision making.

Entrepreneurship The entrepreneur has always served as the catalyst for economic development and subsequently the economic stimulation of a given community. Nowhere is the statement more accurate than within a given tribal community. Entrepreneurship is a pathway to not only self-sufficiency but perhaps more importantly to economic stimulation.

Economic Development Throughout the history of colonization, the seemingly inevitable consumption and foreseeable fate of vast and valuable inherent tribal resources has lain within the hands of the colonizers and the federal government. Contemporarily however, tribal nations and their respective tribal governments have taken back the power over their own economic development and their inherent cultural resources and have above all involved themselves with the institution and sustainability of those resources.

Community Impact The NWIC college has had great impact on the Lummi Nation economy, and is critical for the continued development of the economy and demonstrates these realities: 1) the importance of the NWIC on the Lummi Community; 2) the Lummi People's determination to make the most of an opportunity when opportunities are available to them; and 3) provides a means to rediscover and preserve their own culture and history.

A.6 Community Organizations

Lummi Education Commission

The Lummi Education Commission is a community activity group established to insure and provide for the integration of life-long survival/learning skills into all Lummi educational entities so all the entities may work as one, toward the Lummi Nation's educational goals. (Ratified by LIBC Resolution 96-138)

Lummi Health & Human Services Commission

The Lummi Health & Human Services Commission is a community activist group established to raise the health status and health care provided to the Lummi People to the highest possible level. In addition, the Lummi Health Commission is the advocate for preserving the federal government's trust obligation to provide health care to the Lummi People as provided in the Treaty of Point Elliott of 1855. (Ratified by LIBC Resolution 96-111)

Lummi Law & Justice Commission

The Lummi Law and Justice Commission is a community activist group established to ensure and provide primary law enforcement and judicial services for the safety and protection of the Lummi people consistent with community needs and standards. The Law and Justice, and Judicial Services provided by the Lummi Nation are available to all Native Americans and other persons residing, visiting, or in transit across any or all portions of the Lummi Reservation consistent with Lummi Nation laws, ordinances, and policies. The Lummi Law & Justice Commission is the advocate to preserve the federal government's trust obligation to provide law enforcement and judicial services for the Lummi People as provided in the Treaty of Point Elliott of 1855. (Ratified by LIBC Resolution 96-72)

Lummi Natural Resources Commission

The Lummi Natural Resources Commission is a community elected group established to carry out the Lummi Code of Laws, Title 10, and ordinance to establish the institutional framework to govern and regulate fishing, hunting, and other natural resources activities under the jurisdiction of the Lummi Nation. The Commission also ensures the protection of the environment required to sustain high levels of production of those resources in conformity with the accepted standards of international law, specifically as reserved and secured to the Lummi Nation by the Treaty of Point Elliott on January 22, 1855, and upheld United States vs. Washington 496.F.2d 620 (9th Cir. 1974). (Ratified by LIBC Resolution 95-92)

Lummi Planning & Public Works Commission

The Lummi Planning Commission is a community activist group established to insure and provide for the development of the Lummi community through proper community planning, land use zoning, planning regulation enforcement, and environmental use. (Ratified by LIBC Resolution 96-90)

Lhaq'temish Foundation | Lummi Nation Service Organization

The Lummi Nation Service Organization (LNSO) is a 501(c)(3) non-profit organization capable of relationship development and accessing private foundations and other charitable funding resources. LNSO provides fiscal sponsorship to numerous approved projects and activities that "inspires individuals and community empowerment to strengthen our future." LNSO also assists LIBC in administering the community contribution fund pool to distribute back to various community-based projects. Community-

based projects have a focus on education, culture, social development, or civic purposes, and have unmet funding needs into the foreseeable future.

Lummi Te'Ti'Sen Center – Entrepreneurship and Business Incubation

With a pressing need for new jobs, the LIBC needed a plan to strengthen its local economy. Per LIBC Resolution 2017-075, dated June 20, 2017, the LIBC reassigned the Lummi Te'Ti'Sen Center to the Economic Development Department. Economic Development has been working with Western Washington University (WWU) and Small Business Development Center (WWU-SBDC) to improve the services in helping startups in our region grow their companies and develop their teams.

- Establish a strong focus on entrepreneurship and self-sustaining economic development efforts.
- Assess our region's current practices and capacity for entrepreneurial initiatives, programs, and resources throughout the region (Local, State, Federal, Regional, Colleges and Universities)
- Promote and support direct entrepreneurial education, mentorship, and internship efforts.
- Pursue joint projects (startup competitions, business student's assistance to small business owners, work with WWU SBDC on entrepreneurship education programs)
- Promote and support the development of entrepreneurial-friendly workspaces and facilities
- Encourage the co-location of multiple resource agencies to provide on-site expertise (multi-college small business center, technology development center, cooperative extension)
- Provide counseling by focusing on an entrepreneurial culture and business foundations.

LIBC Administration Café

The LIBC café is a small deli located within the LIBC Administration Center. The café is 1024 square feet and includes a kitchen, seating area, and most utilities. In addition to the 400 employees working in the Administrative Center, another 285 employees are located within a one-mile radius.

The café is a certified food service café with deep fryers, refrigeration, freezer, small oven, soup wells, warmers, microwave, sandwich press, etc. The café does NOT include a commercial grill nor stovetop burners because of ventilation constraints. Food requiring heavy preparation and cooking will need to be done at an offsite kitchen then transferred to the café. The café opens at 8:00AM and closes at 2:00PM.

A.7 Partners

The Lummi Nation has a unique legal and political relationship with agencies and government entities at the city, county, state, regional and federal levels. President Nixon announced a national policy for self-determination for Indian tribes in 1970, allowing tribes to control their own affairs to exercise self-governance and decision making on issues that affect their people. In 2000, under President Clinton, [Executive Order 13175](#), was issued, which entitles Consultation and Coordination with Indian Tribal Governments, and reaffirms the Federal government's commitment to tribal sovereignty, self-determination, and self-government. Its purpose is to ensure that all Executive departments and agencies consult with Indian tribes and respect tribal sovereignty as they develop policy on issues that impact Indian communities

Recently announced through a February 5, 2021, Dear Tribal Leader Letter (DTLL), the focus of this consultation was to re-evaluate the department's adherence to, and implementation of, the directives of Executive Order 13175, "Consultation and Coordination with Indian Tribal Governments". Federal departments in the Executive branch, have initiated these activities in response to President Biden's January 26, 2021, "[Presidential Memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships](#)." President Biden's memorandum emphasized the Administration's commitment to respect Tribal sovereignty and self-governance, while acknowledging that honoring the federal government's trust and treaty obligations to Tribal Nations is vital due to current crisis related to health, the economy, social justice and climate change. LIBC notes, however, that the DTLL combined Tribal consultation with the Executive Order on "[Advancing Racial Equity and Support for Underserved Communities Through the Federal Government](#)." We remind the Federal Departments that we are not racial entities. Rather, we have a political relationship with the United States that has been established through the federal government's trust and treaty obligations.

The Lummi Indian Business Council has made great strides to deliver meaningful services to our Government, Agencies, Businesses, and ultimately our membership and community. We have much work left to do as we continue to leverage technology as an additional means to enhance and protect the lives of the Lummi community, families, and membership.

The Lummi Nation is one of the first Indian tribes to develop Self-Governance Compacts and Annual Funding Agreement(s) with U.S. Department of Interior and U.S. Department of Health and Human Services under the Indian Self-determination Education Assistance Act ([ISDEA P.L. 93-638](#) as amended). Lummi Nation seeks to establish a government-to-government relationship with all the federal government, including States, Counties and Cities, to develop and implement American Indian policy recognizing the inherent sovereignty of Indian tribal governments.

The Lummi Nation is committed to continuing building relationships with agencies and government entities that strongly support and respect tribal sovereignty and self-determination, in a manner that cultivates mutual respect and fosters greater understanding to reinforce our principles.

Economic Development partners and engagement opportunities may come from the local, regional, and state level. Partners can include the federal, state, county, and city public agencies, public authorities, public-private partnerships, nonprofit organization, urban planners, community development corporations, chambers of commerce, trade associations, business leaders, educational institutions, financial organizations, utility organizations, neighboring Tribes, and others.

Partners include:

Federal

U.S. Department of Agriculture – [Rural Development](#)
U.S. Department of Commerce – [Economic Development Administration](#)
U.S. Department of Education
U.S. Department of Energy
U.S. Department of Health & Human Services – [Indian Health Service](#)
U.S. Department of Interior – [Bureau of Indian Affairs](#)
U.S. Department of Treasury

State

<i>Department of Agriculture</i>	<i>Department of Archaeology and Historic Preservation</i>
<i>Department of Commerce</i>	<i>Department of Ecology</i>
<i>Department of Fish and Wildlife</i>	<i>Department of Health</i>
<i>Department of Labor and Industries (L&I)</i>	<i>Department of Natural Resources</i>
<i>Department of Revenue</i>	<i>Department of Transportation</i>

County

[Whatcom County](#)

City

<i>City of Bellingham</i>	<i>City of Blaine</i>
<i>City of Ferndale</i>	

Agencies

<i>Affiliated Tribes of Northwest Indians</i>	<i>Bellingham Regional Chamber of Commerce</i>
<i>Lummi Community Development Financial Institution</i>	
<i>National Congress of American Indians</i>	<i>Northwest Indian Fisheries Commission</i>
<i>Port of Bellingham</i>	<i>Whatcom Council of Governments</i>

Educational/Workforce Institutions

<i>Northwest Indian College</i>	<i>Bellingham Technical College</i>
<i>Whatcom Community College</i>	<i>Western Washington University</i>

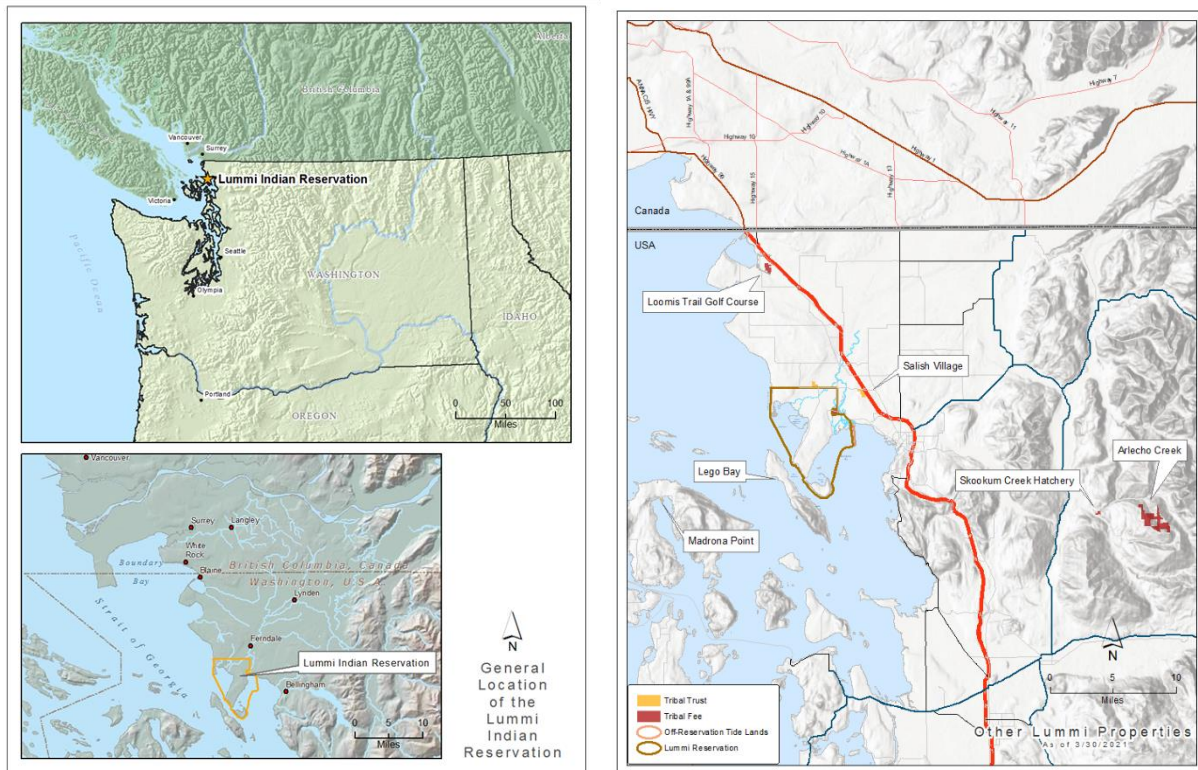
Infrastructure and Utility Organizations

<i>Utility providers</i>	<i>Railroad</i>
<i>Cable and IT Communications</i>	<i>Regional Airport</i>
<i>and many others, too many to list.</i>	

B. Summary Background

B.1 Geographic

Understanding the Lummi Nation economy begins with understanding the geography of the Lummi Indian Reservation and surrounding areas. The Lummi Indian Reservation is located approximately 8 miles west of Bellingham, Washington, 90 miles north of Seattle, Washington and 60 miles south of Vancouver, British Columbia, Canada.



The Reservation is comprised of a five mile long peninsula, which forms Lummi Bay on the west and Bellingham Bay on the east; a northern upland area and the smaller peninsula of Sandy Point on the west; the flood plains and deltas of the Lummi River and the Nooksack River; Portage Island; and associated tidelands.

The Nooksack River, on the eastern boundary of the Reservation, drains a watershed of 786 square miles and discharges into Bellingham Bay (and partially to Lummi Bay via the Red River, during flooding). Because the main peninsula is south of the Nooksack and Red Rivers, each year it is completely isolated from trade partners and emergency services, such as fire departments and ambulances, due to flooding.

Approximately 38 miles of highly productive marine shoreline surround the Reservation on all but the north and northeast borders. Much of the high-density development to date has occurred along the marine shoreline. The Reservation also features relatively low topographic relief and a temperature marine climate. Today the Reservation uplands encompass approximately 12,500 acres and the tidelands are approximately 7,000 acres.

The Lummi Nation also owns additional tribal lands outside of the reservation and they include: Loomis Trail, Salish Village, Lummi Island, Orcas Island, and Portage Island.

Archaeological evidence show that the San Juan Islands supported hunting and gathering areas 6,000-8,000 years ago. The Lummi people followed patterns of seasonal movement between the islands and the mainland and from large winter villages to smaller resource camps occupied in other seasons. Because of the exposure to severe winter winds and storms of the Strait of Juan de Fuca, those sites found within were considered more likely seasonal, rather than permanent settlements, but still of the utmost importance to the Lummi people today.

B.2 Climatic

Pacific Northwest climate and ecology are largely shaped by the interactions that occur between seasonally varying weather patterns and the region's mountain ranges.

Approximately 75 percent of the region's precipitation occurs in just half the year (October – April) when the PNW is on the receiving end of the Pacific storm track. Much of this precipitation is captured in the region's mountains, influencing both natural and human systems throughout the PNW. Precipitation is generally light during the summer, increases in the fall, peaks in December, and then decreases through the spring with a slight increase in May and June followed by a sharp drop near the first of July. From late spring to early fall, high pressure to the west generally keeps the Northwest fairly dry. These seasonal variations are related to changes in large-scale atmospheric circulation occurring over the Pacific Ocean, including the Gulf of Alaska.

Mild year-round temperatures, abundant winter rains, and dry summers characterize climate in the low-lying valleys west of the Cascades. Average annual precipitation in most places west of the Cascades is more than 30 inches. Precipitation in the mountains is much higher. The western slopes of the Olympic and Coast mountain ranges – the first recipients of winter storms – typically receive about 118 inches per year, with some locations on the Olympic Peninsula exceeding 200 inches per year. Average annual precipitation in the Cascades typically exceeds 100 inches or more. The Cascades are often among the snowiest places on Earth.

Based on climate data collected at Bellingham Airport, the average annual precipitation on the Reservation is approximately 36 inches. On average, November December and January are the wettest months; June, July and August are the driest months. Wind data for Bellingham indicates that the prevailing wind direction on the Reservation is from the south and south east, with gusts upward of 80 miles per hour.

There are four weather stations in Whatcom County that have collected precipitation and temperature data over an extended time period: Bellingham, Blaine, Clearbrook and Glacier. Standard [AWN](#) weather variables include air temperature, relative humidity, dew point temperature, soil temperature at 8 inches, rainfall, wind speed, wind direction, solar radiation and leaf wetness.

B.3 Cultural

The phrase “Usual and Accustomed Grounds and Stations” (U&A) comes from Article 5 of the [Treaty of Point Elliott](#), which was signed in 1855 and ratified by the United States Senate in 1859.

Indian Tribes in Washington State who signed treaties with the United States in the mid-1850’s retained the right to “fish” at all “usual and accustomed grounds and stations” (U&A). That is, where they had traditionally harvested water, dwelling, animals, and plants before the Treaty. Usual and accustomed areas refer to fishing activities and are not applicable to hunting and gathering activities on terrestrial areas, which are governed by other portions of the Treaty. The U&A includes the shoreline areas involved in the fishing activities, as well as access to the water across uplands.

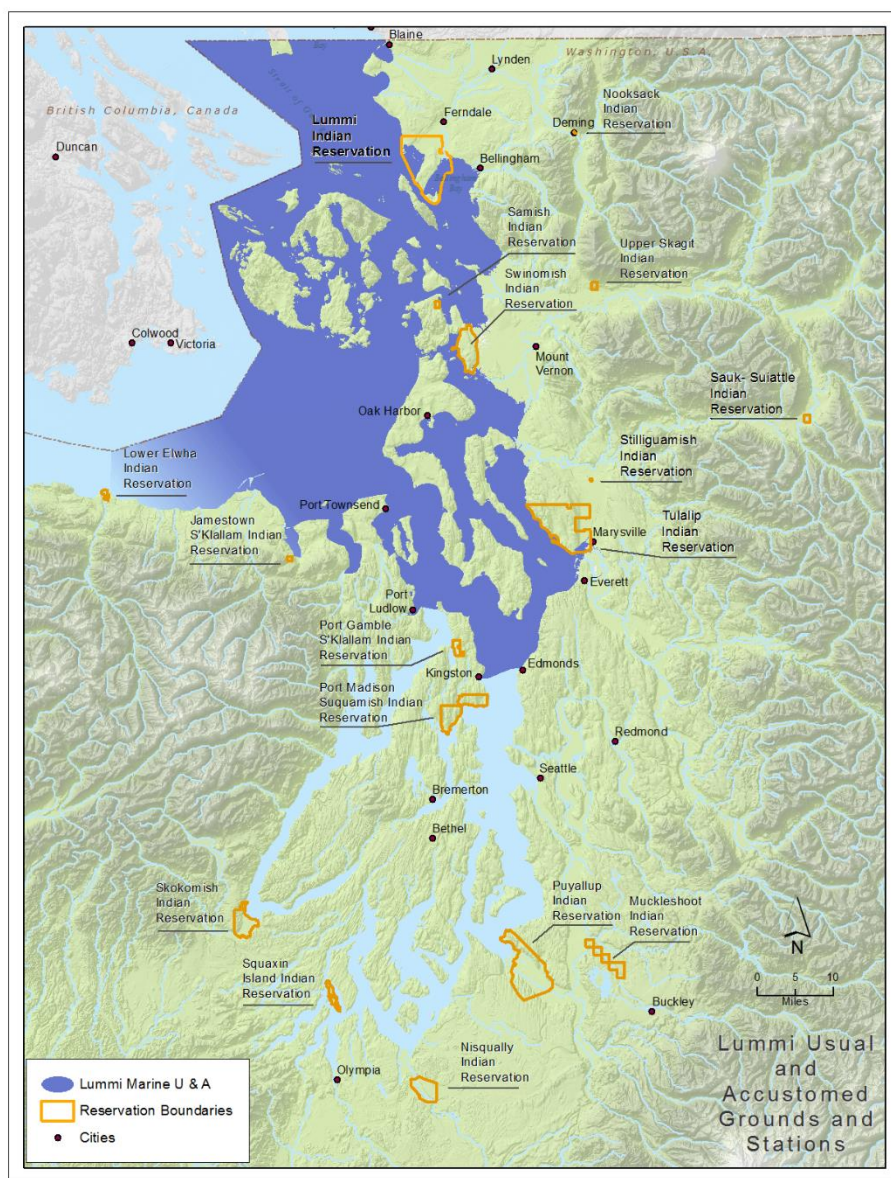


Figure 7 Lummi Usual and Accustomed Grounds and Stations

B.4 Natural Resources

Fisheries Management

Lummi Natural Resources (LNR) is a co-manager of several Treaty-reserved fisheries: Chinook salmon, sockeye salmon, coho salmon, chum salmon, pink salmon, Dungeness crab, Manila clams, sea cucumbers, geoduck clams and sea urchins. In support of this, LNR performs several related activities:

- Negotiates management agreements with the State and other tribal co-managers
- Files regulations to open fisheries and maintains a fishery hotline for Lummi fishers.
- Issues fishing permits to tribal members
- Maintains a tribal fishing vessel registry and issues tribal vessel licenses
- Samples biological data from the catch
- Conducts crab shell-condition testing
- Stock assessment (population) surveys
- Determines harvest targets for on-reservation fisheries
- Provides harvest monitoring required by the International Shellfish Sanitation Program and the FDA
- Tracks and reports harvest data by harvest area from wholesale buyers.
- Coordinates with Lummi Law & Order and tribal lawyers to ensure compliance with fishery regulations

	2016	2017	2018	2019	2020
CHINOOK	100,454	170,793	93,597	85,238	51,287
CHUM	692,817	653,163	321,051	43,920	339,026
COHO	363,013	165,629	305,173	147,300	256,261
COON STP SHRIMP	10,172	20,656	30,594	48,671	36,266
CRAB	1,531,027	1,767,997	1,875,300	1,307,888	1,484,241
GEODUCK	29,943	29,090	17,970		19,389
GREEN SEA URCHIN	2,452	38,252	140,175	64,203	96,877
HALIBUT	64,030	27,422	23,699	18,854	
MANILA CLAM	86,771	121,139	178,144	150,775	50,769
PINK		326,661	276	693,773	3
RED SEA URCHIN	220,567	84,234	127,258	200,857	8,990
SEA CUCUMBER	238,719	251,497	40,845	110,874	64,392
SOCKEYE		3,657	1,978,015	1,796	30
SPINY DOGFISH	267,168	86,890	2,858		
SPOT SHRIMP	25,575	26,395	46,359	39,809	30,740

Table 2 8 Pounds harvested by Lummi Fishers 2016-2020

Skookum Creek Hatchery

LIBC constructed the Skookum Creek Fish Hatchery in 1970, a salmon rearing hatchery on Skookum Creek, a tributary to the South Fork of the Nooksack River near Acme, Washington. In 1991, LIBC purchased the 15.5-acre site. In 2014, LIBC purchased two tracts of land totaling 44.8 acres adjacent to the Hatchery.

The hatchery produces 1.5 million Coho yearlings a year, a process that takes eighteen months. Five months of the year, the hatchery has two age groups of fish on-site; the yearlings that are released each spring into the waters of the South Fork Nooksack River, and the fry, which will be reared to yearling size over the winter.

Lummi Bay Hatchery

In 2020, the Lummi Bay Hatchery released 584,000 Coho salmon juveniles and releases 507,192 Fall Chinook salmon. Another 500,000 Fall Chinook salmon juveniles are released from an acclimation pond located in Bertrand Creek.

The Lummi Bay Hatchery works cooperatively with Washington Department of Fish and Wildlife's Kendall Creek Hatchery for its Coho program and with the Samish Hatchery of the Washington Department of Fish and Wildlife and the Whatcom Creek Hatchery of the Bellingham Technical College for its Fall Chinook programs.

The Lummi Bay Hatchery is a unique site that uses freshwater pumped from the Nooksack River and saltwater pumped from Lummi Bay. These two water sources allow culturists to rear the young salmon in freshwater and slowly convert to saltwater before releasing them into Lummi Bay to start their ocean journey.

Forestry

In 2020, the forestry crew planted 1,000 Douglas-fir seedlings on Sucia Dr. and Lake Terrell Road and Western Red Cedar. They also sprayed herbicide treatments on 32 acres on Sucia Dr. and Lake Terrell Road.

Hunting

Lummi hunters harvested the following wildlife under Lummi hunting regulations during the 2019-2020 Hunting Harvest Management Year.

Species	Male	Female	2019-20	2018-19	% change
Deer	8	8	16	139	-88
Elk	8	1	9	37	-76
Goat	0	0	0	1	-100
Bear	1	0	1	3	+67
Cougar	0	0	0	2	+200

Table 3 2018-19 Lummi Nation Harvest Summary

B.5 Land Ownership

When the Lummi leaders signed the Treaty of Point Elliott of 1855 and ceded their land, they retained the Reservation for the common use of the Tribe. Subsequent federal intervention divided the land into parcels which could eventually be converted to common tribal ownership if not occupied and developed. Federal policies in the late 1800's and early 1900's, however, prevented the conversions, resulting in dozens of "assignments".

The eventual death of the original assignees and the inheritance of undivided interests over several generations have left many parcels in multi-party ownership. Federal policy requires the consent of at least 51% of the parcel owners before any activity may occur on the land, including a lease or other exclusive rights. Much of the land on the Reservation is now held by multiple owners who are descendants of the original assignees, subject to those restrictions.

This has directly impaired development on the Reservation. Case in point: If over 100 individuals have an interest in a single 40-acre parcel on the Lummi Reservation. Since they cannot locate 51% of the owners (most are not Lummi Tribal Members, some are not U.S. citizens), they cannot sell the land – or even lease it for that matter. Instead, the land lies fallow, a complete waste of economic utility.

The land ownership checkerboard on the Reservation and generally throughout "Indian Country" is divided into five categories: Individual Native Trust, Individual Native Fee, Tribal Fee, Tribal Trust and Fee. The following table summarizes the area of uplands in each of these categories.

Lummi Reservation Land Ownership

Category	Acres	Percentage
Individual Native Trust	6,829.2113	52.6
Non-Tribal Fee	2,516.3154	19.4
Tribal Trust	2,511.1215	19.3
In Process of becoming Trust land	509.20912	3.9
Tribal Fee	495.33072	3.8
Individual Native Fee	130.89014	1.0
TOTAL	12,992.078	100

Table 4 Lummi Reservation Land Ownership

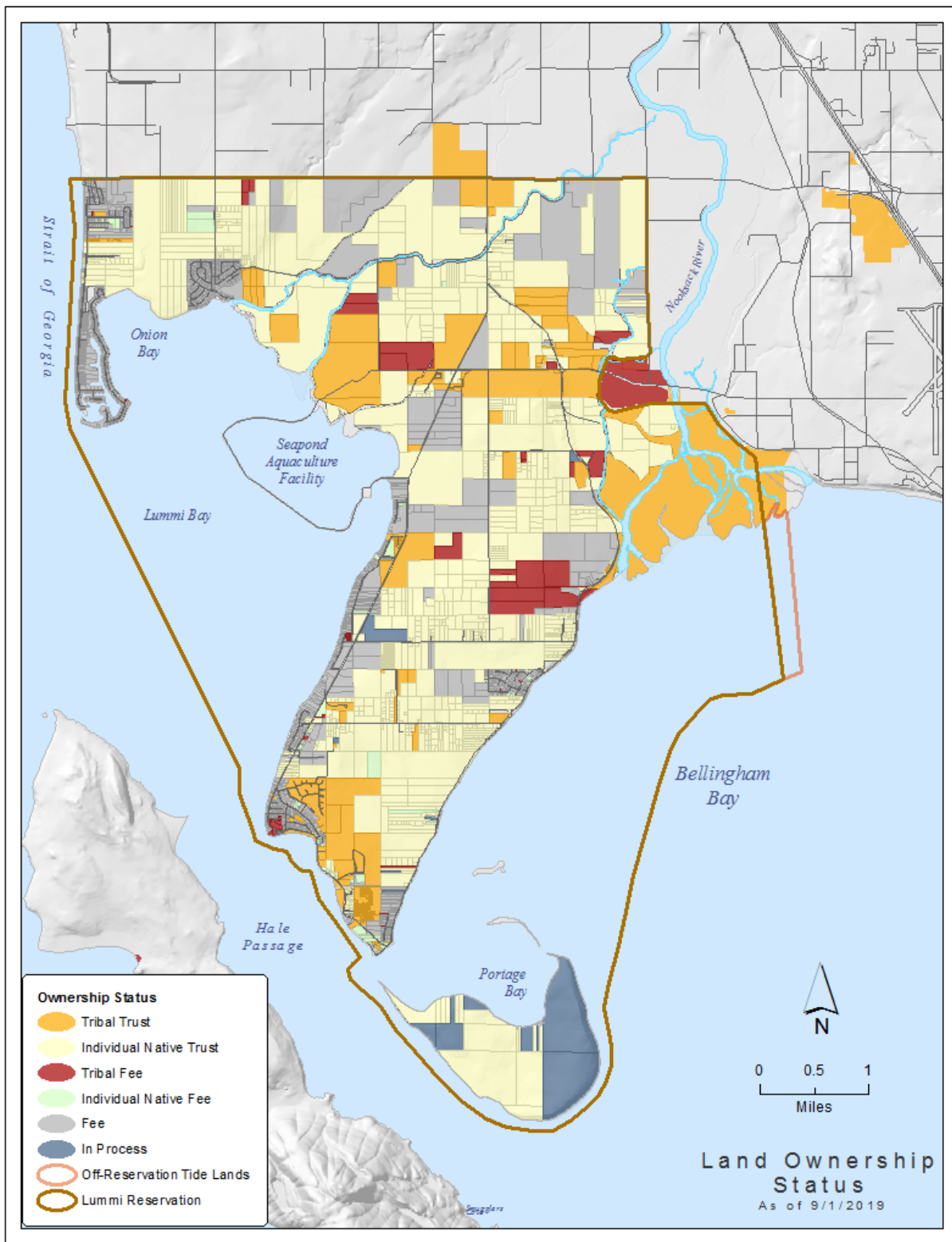


Figure 9 Land Ownership Status

Explanation of Trust Status Trust Status refers to Indian-owned lands where the title is held in trust and protected by the federal government. Indian people and tribes have use of the land, but ultimate control of the land remains with the federal government. Because of the extension of treaties, all land within the defined boundaries of Indian reservations and some of those owned by tribes or individuals off the reservation were initially held in “trust status”. This means that the administration and disposition of an individual or tribe’s land base is supervised by the Bureau of Indian Affairs through federal law. Thus, even though an individual Indian or tribal government may own a parcel of trust land, the land cannot be leased, sold, or mortgaged without acknowledgement and approval by the Bureau of Indian Affairs.

Explanation of Fee Simple This is the most basic form of land ownership. The owner holds title and control of the property. The owner may make decisions about the most common land use or sale without government oversight. In Indian Country, however, whether the owner of fee simple land is Indian or non-Indian is a factor in deciding who has jurisdiction over the land. Due to the “checker boarding” of Indian reservations, different governing authorities – such as county, state, federal and tribal governments – may claim the authority to regulate, tax or perform various activities within reservation borders based on whether a piece of land is Indian or non-Indian owned. These different claims to jurisdictional authority often conflict. The case law relevant to jurisdiction on these lands is complex and, on some points, inconsistent and unsettled.

Impact of Land Ownership Policies The overview of land ownership on the Lummi Reservation is important because of the impact it has on the development of the Reservation economy, both historically and currently.

Tidelands

The tidelands are fully owned by the Lummi Nation. Likewise, the uplands on the Reservation owned by the Lummi Nation (shown as “Tribal Trust”, “Tribal Fee”, and “In Process”) include:

- the vast majority of the Nooksack River and Red River deltas,
- the Kwina Road corridor (runs east-west between the river deltas) which is where the Tribal Administrative Center, the Lummi Tribal Health Clinic, Northwest Indian College, the MBR Wastewater Facility, and most social services are located.
- Mackenzie (area located in the south end of the peninsula) which is home to the Mackenzie Housing Development, the Lummi Tribal School, Little Bear Creek Elder Facility, the Wexliem Community Building, Boat Launch, and Gooseberry Point Wastewater Facility.
- Portage Island, which is preserved in its natural state.

The above-mentioned list isn’t the most desirable or economically viable land on the Reservation. In many cases, the Lummi Nation the land was selected because 51% of the owners could be located for the tribe to take over ownership.

Land policy not only impacts land use, but the operating budget of the Lummi Nation. There are currently 1966 households on the Lummi Reservation. Beginning in the 1950’s non-Indians began purchasing and moving into the scenic shoreline property. Today 59% of the homes are owned by non-Indians.

This creates a challenge in that the Lummi Nation pays for all police, infrastructure, and other government services on the Reservation, yet non-Indian residents (59%) of the homes pay property tax to the County, not the Tribe. Imagine the impact to any government if 59% of its residents just stopped paying taxes.

B.6 Government

Historically, the Lummi people lived and prospered from the resources of their native lands. They travelled freely among the islands, lowlands and mountains of the upper Puget Sound and Georgia Straits. Lummi villages were clusters of cedar plank long houses shared by groups of families. Common language and culture were shared with other natives referred to as the Straights Salish. This group included the Semiahmoo, the Saanich, the Songhees, the Sookes, the Klallams and the Samish.

The Lummi means of subsistence were salmon fishing, shellfish, plant gathering, and hunting. Salmon fishing was of such importance that each year the Lummi celebrated the First Salmon, treating the first netted salmon as a special guest.

Today, the Lummi Nation is comprised of 5,320 enrolled tribal members that reside on and off reservation boundaries. Within certain restrictions imposed by the U.S. Government, the Tribe has jurisdiction over activities occurring on the Reservation has rights to economic and other benefits resulting from the use of the Reservation property and resources.

Lummi Indian Business Council

The Lummi Indian Business Council (LIBC) is the duly elected governing body of the Lummi Tribe of the Lummi Indian Reservation by authority of the Constitution and By-Laws of the Lummi Nation as approved on April 10, 1970 by the Assistant Commissioners of Indian Affairs. The Lummi Indian Business Council became self-governing under congressional legislation in 1994.

The Council members are elected officials who represent the highest decision-making authority for the Nation and are strong advocates of the Economic Development planning process. The LIBC is comprised of eleven (11) enrolled Lummi tribal members who are elected to three-year staggered terms by members of the Lummi Nation General Council. A minimum of seven (7) members must live on the reservation. Following each election, the LIBC at their first meeting elect Officers from their own membership to serve for one-year terms. The LIBC elected Chairman, Vice-Chairman, Secretary and Treasurer carry out the constitutional duties of their offices in accordance with the Lummi Constitution, Codes, and legislative action.

The responsibilities of the Council include maintaining a government-to-government relationship with federal, state, county, city, and other tribal governments.

B.7 Demographic & Socioeconomic Data

Population

The Lummi Nation Enrollment Office collects and electronically stores all pertinent documents and records of birth, deaths, and marital status, concerning each enrolled member of the Lummi Nation. In addition to helping parents of newborn babies with the enrollment process, the Enrollment Offices tracks all births, deaths, and marital status of Lummi Tribal Members.

Information on births and deaths by age, sex and cause is the cornerstone of public health planning. When births and deaths are not documented, governments cannot design effective public health policies or measure their impact. According to the Enrollment Department, the Lummi people averaged 150 new enrollments per year and about 35 deaths per year.

There are 5,632 enrolled tribal members. ¹There are approximately 2,273 households located on the Reservation, with 1,966 occupied and 307 vacant. Between 2015 and 2020, the Lummi population grew by 7.3%. By 2025, the population is projected to be 6092 tribal members, which results in an addition 7.5% growth.

Enrolled Population Projections

	2021	2022	2023	2024	2025
TOTAL ENROLLED LUMMI	5632	5747	5862	5977	6092
Males	2731				
Females	2901				
17 YEARS AND YOUNGER	1273				
Males	610				
Females	663				
18 YEARS - 54	2766				
Males	1279				
Females	1487				
55 YEARS AND OLDER (to 99)	1602				
Males	789				
Females	813				
MEMBERS LIVING ON RESERVATION	2895	2957	3019	3081	3143
MEMBERS LIVING OFF RESERVATION	2737	2790	2843	2896	2949

Income

The household incomes on the Lummi Indian Reservation are very wide ranged. Incomes range from less than \$10,000 to more than \$200,000. However, the income of the more affluent non-tribal population

¹ 2014-2018 American Community Survey 5-Year Estimates <https://www.census.gov/tribal/?aianihh=2070>

distorts the actual statistics of the tribal population, which lag. The median household income of a Lummi tribal household is only \$53,509 as compared to Whatcom County's \$62,984 and ²Washington State's \$70,116.

Moreover, Lummi tribal households are typically multigenerational. As a result, the United States Census Bureau American Fact Finder reports that there are more people in the average Lummi household (2.85) than a Washington State (2.55) or Whatcom County (2.49) household.

Unfortunately, a comparison of per capita income shows that incomes on the Lummi Reservation are less than Whatcom County (which includes the Lummi Reservation, therefore the Lummi Reservation income is lowering the overall average Whatcom County income. So, in actuality, if the Lummi Reservation were excluded, the County average would be even higher), the United States, and the rest of Washington State.

As mentioned above, the non-tribal residents have incomes higher than Lummi Tribal Members. As a result, the per capita income of a Lummi Tribal Member living on the Lummi Reservation is even less than the \$25,992. Per capita income is \$30,586 for Whatcom County; \$36,888 for Washington State; and \$32,621 for the United States.

² https://www.census.gov/search-results.html?q=state+median+household+income&page=1&stateGeo=none&searchtype=web&cssp=SERP&_charset=utf-8

B.8 Education

There was a moment in the Spring 2020, when every parent and employer in America suddenly realized how deeply their lives and livelihoods depended on an institution too often in the background and taken for granted: schools.

At Lummi, the Education Division made many changes since following public health directives to shelter in place since the second week in March. With almost no notice, adults and children found themselves in the middle of a massive national experiment in new ways of teaching and learning, and new ways of dividing responsibilities between home, school, and work.

A year later, it's clear that the COVID-19 pandemic has changed education in lasting ways. The Education Division has developed virtual options in the expectation that after the pandemic, some families will stick with remote learning.

Colleges are finding new ways to spark student creativity, harness technology, and provide services they need to succeed.

The pandemic has unleashed a wave of innovation in education that has accelerated change and prompted new ways of thinking. It has also been a tragedy for many students' educations. Stories of kids who have melted away from school, who are hungry, abused, and without broadband connectivity. The disproportionate weight of the pandemic on BIPOC and low-income students has ignited calls for a dramatic reinvestment.

We realize that students must be supported to catch up academically and process trauma, which may take several years. Some students need to be tracked down and convinced to come back to school. And the biggest hurdle is providing students with access to technology.

The bottom line is that this past year has provided an *education* for everyone in schools and colleges.

The Lummi Indian Reservation is home to the Lummi Nation Early Childhood Education/Head Start; the [Lummi Nation K-12 Tribal School](#); and the [Northwest Indian College](#).

Lummi Early Learning Program

The Early Learning Facility is located adjacent to the Lummi Indian Business Council Administration Building. It is comprised of childcare, head start, early head start, birth to three, to provide education services to support children, families, and their community through partnerships with other community resources.

Lummi Nation School - K-12

2017-2018	2018-2019	2019-2020
284	380	425

Table 5 Student population at Lummi Nation School K-12

Northwest Indian College

With its main campus located on the Lummi Indian Reservation in Washington State, 20 miles south of the Canadian border, Northwest Indian College is the only accredited tribal college serving the states of Washington, Oregon, and Idaho.

NWIC grew from the Lummi Indian School of Aquaculture, founded in 1973, a single-purpose training program developed to prepare technicians for employment in Indian-owned and operated fish and shellfish hatcheries throughout the United States and Canada.

In 1983, the Lummi Indian Business Council recognized the need for a more comprehensive post-secondary institution for tribal members, and the college was chartered as Lummi Community College, an Indian-controlled, comprehensive two-year college, designed to serve the post-secondary educational needs of Indian people living in the Pacific Northwest.

June of 1988, Lummi Community College was approved as a candidate for accreditation by the Northwest Association of Schools and Colleges (NWASC)

January 20, 1989, in acknowledgement of its wider mandate to serve Native people through the Northwest, Lummi Community College changed its name to the Northwest Indian College.

September 1993, Northwest Indian College was granted accreditation at the associate level by the Northwest Commission on Colleges and Universities (NWCCU).

In 2010, NWIC became accredited at the baccalaureate level and now offers four bachelor's degrees. The College's educational programs have been approved by the U.S. Department of Education, Veteran's Administration, and the Washington State Higher Education Coordinating Board for the administration of financial assistance for eligible student. Northwest Indian College is a member of the American Indian Higher Education Consortium (AIHEC), the American Association of Community Colleges, and the American Council on Education.

NWIC Key Facts

History	Founded in 1973 Northwest Indian College's main campus is located at the Lummi Nation. The
Seven Campuses	College also has six full service extended campus sites located at Muckleshoot, Nez Perce, Nisqually, Port Gamble S'Klallam, Swinomish, and Tulalip.
Admissions Overall	2,152 Annualized Headcount
Native American	84%
Gender	70% Female
Tribes Represented	115+
Average Age	32
Average Graduate GPA	3.28

History	Founded in 1973
Student Clubs	11
	Bachelor Degrees 5
Degrees & Programs	Associates Degree 6
	Certificate Programs 6

Also, participation in vocational training is very common, as 34.5% of adult Lummi have received vocational training. The most common type of vocational training is construction trades.

The education level of the tribal population has increased dramatically over the last decade. The U.S. Census Bureau, [2019: American Community Survey 5-Year Estimates](#) show percentage of the population with a High School diploma (or GED) or higher was 88.0%. Likewise, the percentage of the tribal population with a Bachelor's Degree or higher was 20.8%.

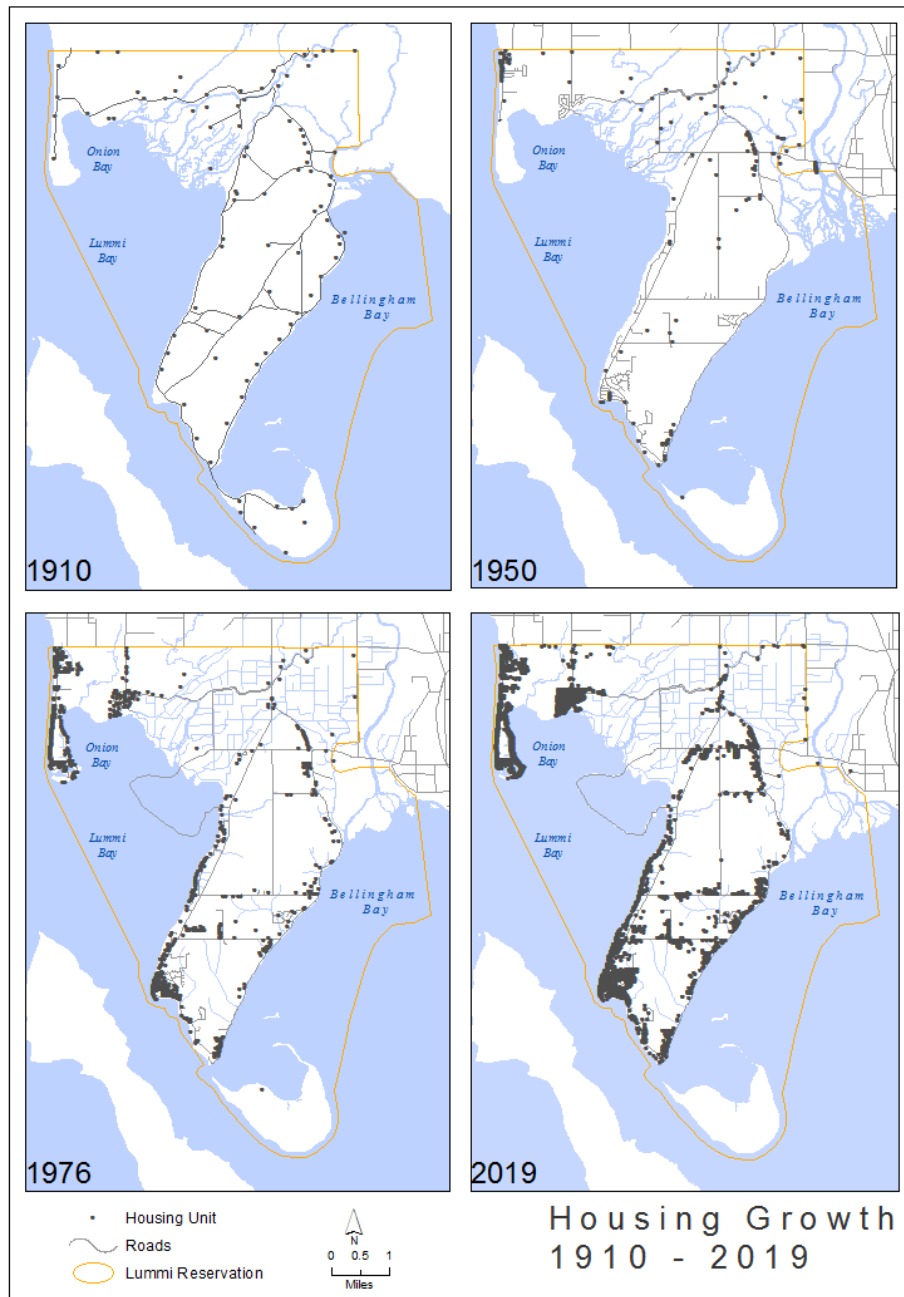
The jump in some High School, Associates Degree and Bachelor Degree rates can be directly attributed to two factors. First, the previously discussed Northwest Indian College, which in addition to an Associate Degree program, added a Bachelor Program. 38% of Lummi Tribal School students indicate they are interested in attending Northwest Indian College.

The second factor is the relocation of the Lummi Tribal School from emergency trailers to a new K-12 facility in 2004. However, even though great strides have been made in education, the tribal population still lags behind the rest of [Whatcom County](#) – particularly in percentage of the population with a Bachelor Degree at 46.3%.

B.9 Infrastructure

To understand the infrastructure of the Lummi Indian Reservation is to understand the 1950's change in the Reservation population. In 1910, the Lummi People were living along the shores of the Salish Sea and the banks of the Nooksack and Red Rivers.

As mentioned earlier, beginning in the 1950's, non-Indians began purchasing and moving into the scenic shoreline property. To accommodate these new residents, Whatcom County changed the reservation's road system. This included the construction of Haxton Way *Cha-Choo-Sen*, running north-south, which provided access to the ferry terminal serving the off-reservation Lummi Island (bottom left on the maps).

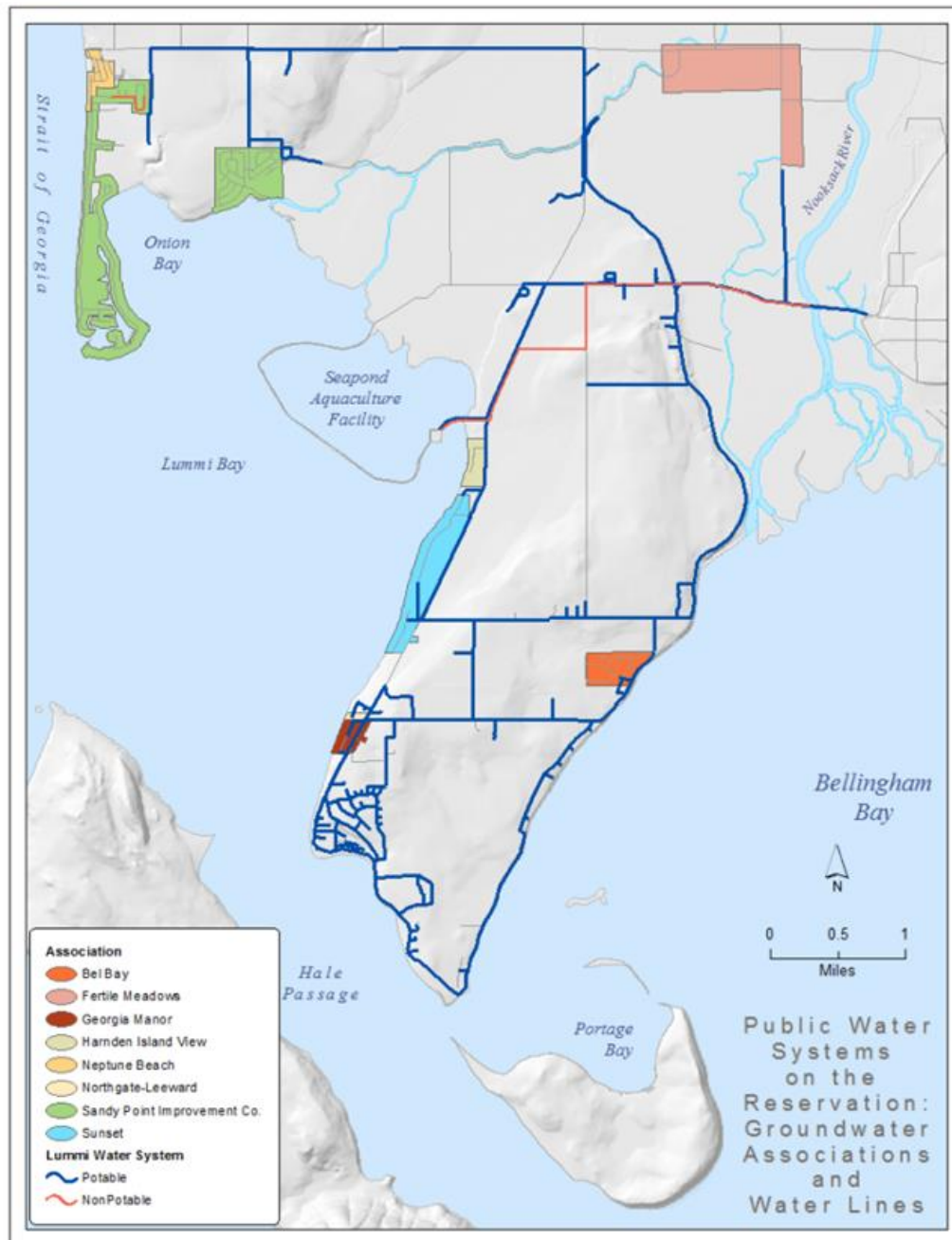


Year	Non-Tribal Residential	Tribal Residential	Non-Tribal Commercial	Tribal Commercial	Tribal Intuitionial	TOTAL
2016	38	11	0	0	0	49
2017	17	32	0	0	1	50
2018	17	12	1	2	1	33
2019	24	39	0	1	4	68
2020	23	23	0	2	3	51
2021	5	13	0	0	0	18

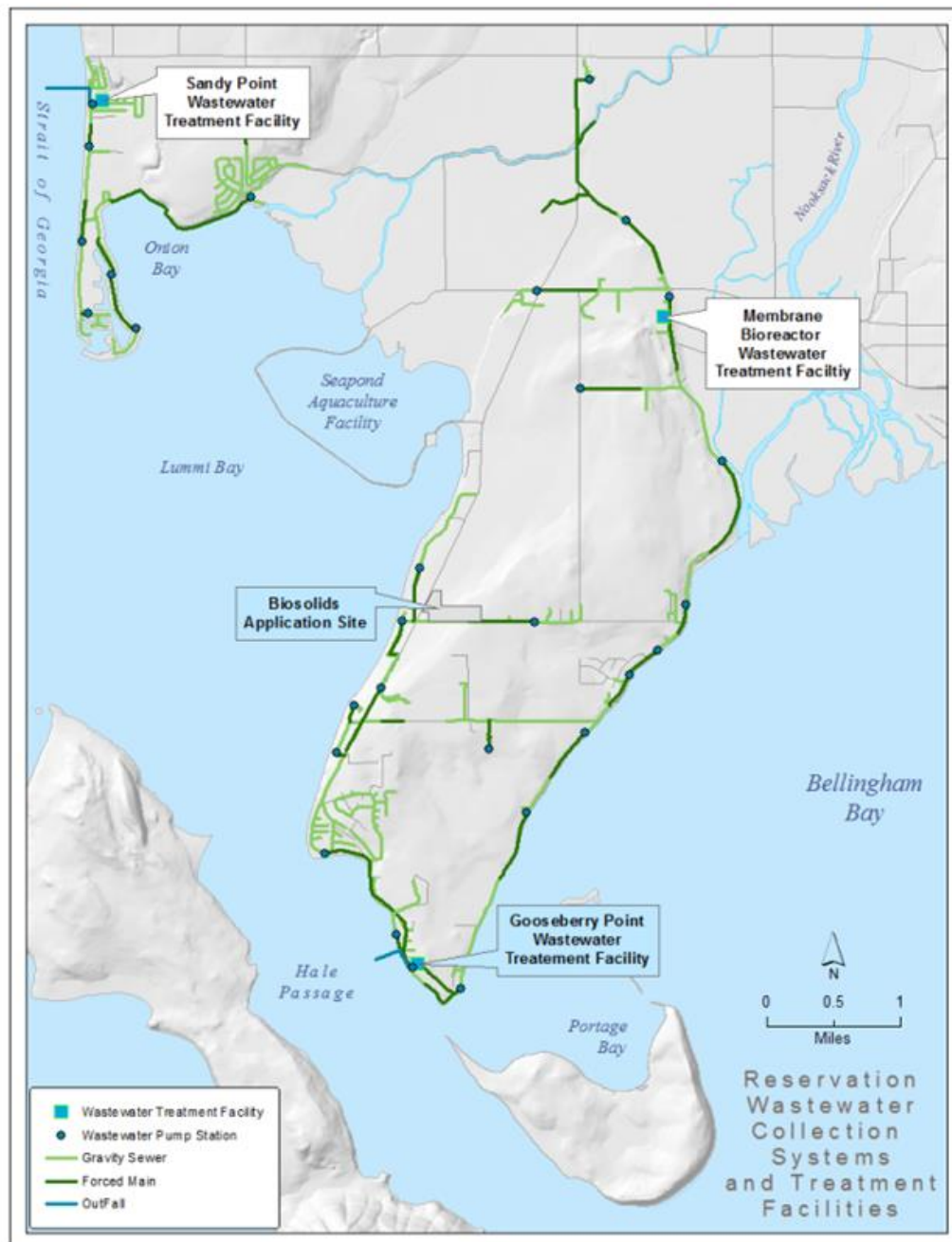
Table 6 Lummi Building Permits Issued 2016-2021

B.10 Water and Sewer

Prior to 1950, almost all homes on the Reservation obtained their water by carrying it from the Nooksack or Red River. Starting in 1950, the newly arrived non-Indian population began creating water associations to service their scenic shoreline homes, Georgia Manor, Neptune Beach, Sunset, and Sandy Point Improvement Company, etc.



In 1976 the Lummi Nation formed the Lummi Water and Sewer District to provide water and sanitary services to users located within the exterior boundaries of the Reservation. Today, a nine-member board, one appointed by LIBC and eight elected by the Reservation population (both Indian and non-Indian) governs the district. The Board selects management staff, sets user charges, controls all aspects of general District management, and establishes budgets subject to LIBC approval. All assets developed by the District are ultimately funded by the Lummi Indian Business Council.



B.11 Transportation and Roads

Approximately 65 miles of public roads provide access within the Lummi Indian Reservation. Slater Road, which is along the northern Reservation border, services most of the east-west traffic with direct access to the Interstate 5 corridor. Haxton Way *Cha-Choo-Sen*, Lummi View Drive, and Lummi Shore Road form a loop around the Lummi Peninsula and provide major north-south access to the tribal center, the densely populated neighborhoods near Gooseberry Point, and the Lummi Island Ferry Terminal operated by Whatcom County under the terms of a lease agreement with the Lummi Nation. There are no improved roads on Portage Island.

Roads within the Reservation boundary are categorized as either Whatcom County roads or Bureau of Indian Affairs (BIA) roads. Whatcom County is responsible for maintaining 92% of the Reservation roads. The remaining 8% of roads (approximately 5.1 miles) are maintained by the Lummi Nation. The BIA roads, part of the National Indian Reservation Roads inventory, are primarily spur roads that provide access to tribal member housing developments, aquaculture, or tribal specific utilities. County roads and BIA roads are assigned functional class values, which consider road surface, traffic volumes, connections to other roads, community access, and generally indicate the importance of the road as a traffic corridor.

The 2019 Lummi Transportation Plan provided a comprehensive analysis of Reservation roads including detailed descriptions of individual roads, classification definitions, traffic volumes, planned improvements, and future needs. The Planning and Public Works Departments are preparing a road safety audit.

Three bus lines, one ferry, several miles of roads, and a few miles of sidewalk comprise the Lummi Reservation transportation system. Like the peninsula it serves, the system is rural by nature. There are 65 miles of roadway, many of them in good condition. Only four percent are owned by the Lummi Nation. The majority (91 percent) of the roadways are owned by Whatcom County. The Whatcom Transit Authority (WTA) operates one bus line service, which serves the Northwest Indian College, the Lummi Administration Center, Gooseberry Point, and the Lummi Island Ferry. The other two bus lines are operated by Lummi Transit fully funded by the Lummi Nation. Lummi Transit provides reservation throughout the peninsula and connects the Reservation population to the City of Ferndale located to the north.

The reservation road system has four primary parts: 1) Slater Road, 2) Haxton Way, 3) Lummi View Drive and 4) Lummi Shore Road. These roads form a “loop” around the peninsula. Slater Road forms the northern reservation boundary and is the main east-west arterial to Interstate-5. Slater Road is the major connector to the population and retail centers of Bellingham and Ferndale, and one of two entrances to 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 angles northwest along the eastern shoreline. Lummi Shore Road completes the “loop”, connecting again with Haxton Way just south of Slater Road.

Inside the loop, local roadways provide circulation and access. Smokehouse Road and Cagey Road run uninterrupted east – to – west connecting Haxton Way to Lummi Shore Drive. Kwina Road also runs east – to – west, and then continues east as Marine Drive into the City of Bellingham. It is the second entrance

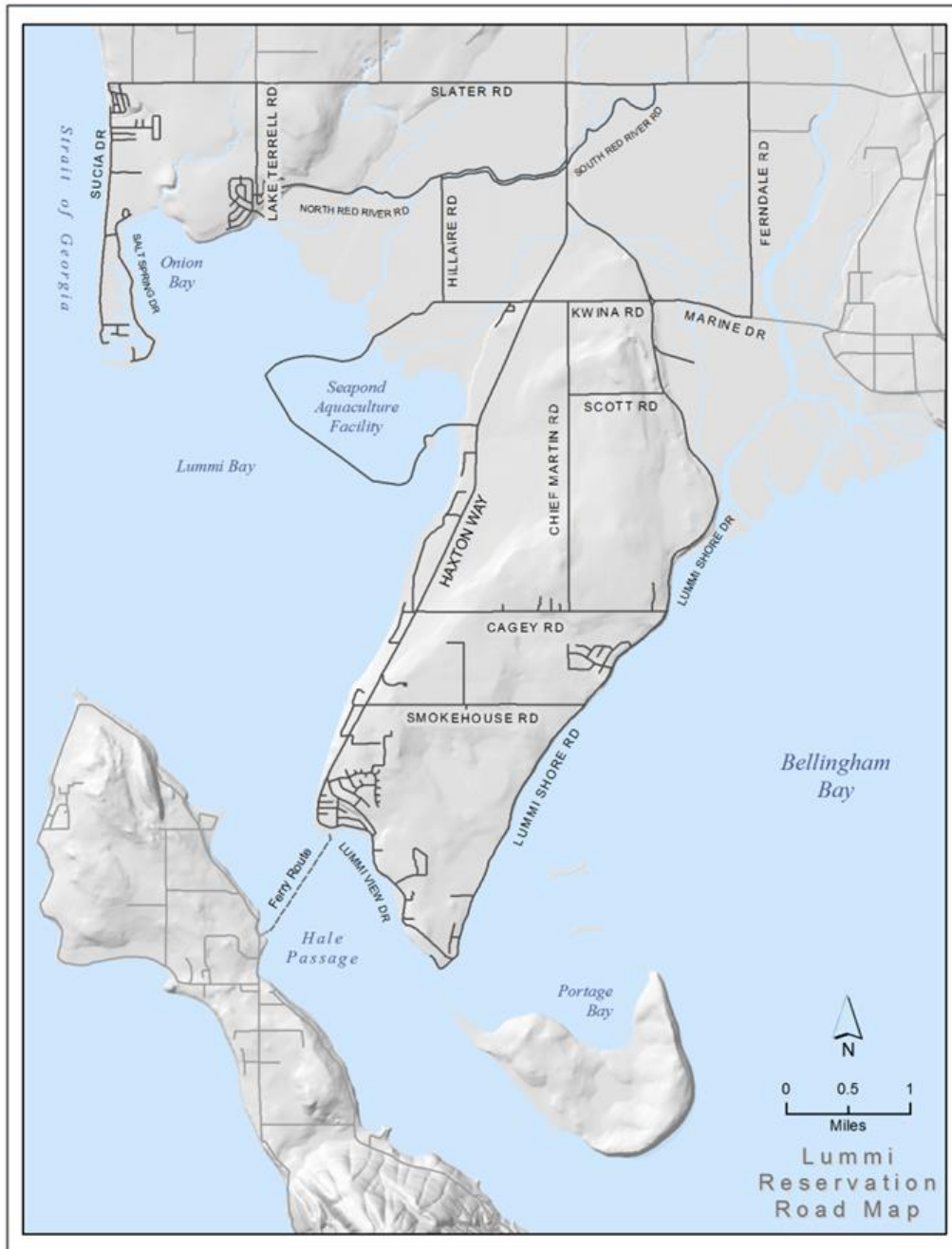
into the reservation. Sucia Drive, in the northwest corner, connects the Sandy Point residential area with Slater Road. Several gravel roads run through the agricultural flood plain, providing local access to croplands.

Roads within the Reservation boundary are categorized as either Whatcom County roads or Bureau of Indian Affairs (BIA) roads. Since 92% of the roads are classified as Whatcom County roads, upkeep and maintenance is provided by Whatcom County. The remaining 8% (approximately 5.1 miles) are classified as Lummi Nation (BIA and Tribal roads), upkeep and maintenance are provided by the Lummi Nation. BIA and Tribal roads are part of the National Indian Reservation Roads Inventory and are primarily spur roads, which providing access to tribal member housing developments, aquaculture, or tribal specific utilities. County roads and BIA roads are assigned functional class values, which consider road surface, traffic volumes, and connections to other roads as a traffic corridor.

As identified in the 2003 Lummi Nation CEDS, the lack of street lighting and shoulders along Haxton Way, maintained by Whatcom County, had been the major contributor in 52 accidents between 1997-1999 and the death of over 11 people between 1994-2003. In 2012, the Lummi Nation constructed a designated pedestrian pathway adjacent to Haxton Way, stretching from Kwina Road to Slater Road. Thanks to the award-winning pathway, which included self-sustaining solar lighting, there have been zero deaths along that stretch of roadway since construction.

In 2014, the Lummi Nation built a roundabout at the intersection of Haxton and Kwina, and another at the intersection of Haxton and Smokehouse to further improve traffic safety.

NOTE: Check with Kirk V about extension of Scott Rd to Haxton Way



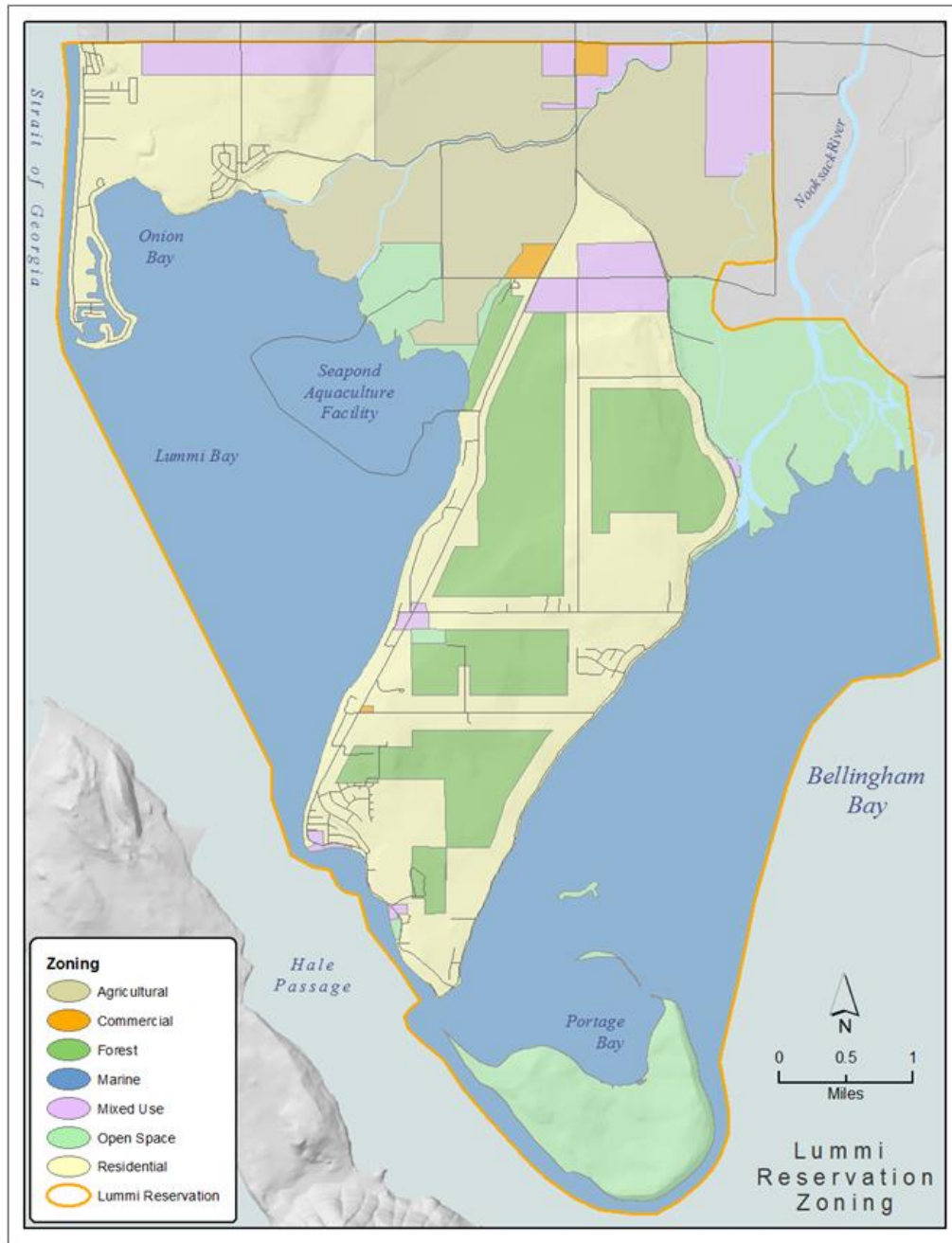
B.12 Zoning

The zoning on the Lummi Reservation is in mostly the product of the land ownership and infrastructure issues that began in the 1950's.

For example, almost all the commercial property and approximately 50% of the mixed-use zoning on the Reservation is in the floodplain. This zoning is not because land susceptible to annual flooding is the ideal location for business, but rather because it was property where over 51% of the owners could be identified and thereby agree to sell the land. In order to promote the health, safety, and general well-being of all residents, and to promote harmony between the many interests on the Reservation, the Lummi Nation Land Use Zoning and Development Code (Title 15) and the Lummi Nation Flood Damage Reduction Code (Title 15A) provide clear development standards for current and future use.

The Lummi Planning Commission and the LIBC have classified and divided the Reservation into the following zoning categories (LIBC Resolution 2004-115, updated December 2010)

- **Residential:** The residential zone district 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. o Rural Residential: 1-3 dwelling units per acre o Suburban Residential: 5-7 dwelling units per acre
- **Commercial:** The commercial zone district comprises land suitable for commercial and business uses to meet objectives in economic development and provide employment opportunities to improve the economic conditions of tribal government and individual tribal members.
- **Light Industrial:** The light industrial zone district provides 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 allocates land suitable for the sustained cultivation and production of forest products and provides land for low-density rural residential development, where such mixed uses are consistent with the Comprehensive Plan and Forest Management Plan (2010)
- **Agricultural:** The agricultural zone district recognizes the importance of agriculture and allows the continuation of farming activities by allocating land for them. It also allocates land for accessory and supporting uses to farming, including residential and resource conservation. Land uses like restoration and protection of natural resources and residential development are allowed in addition to farming.
- **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.
- **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.
- **Marine:** The marine zone district comprises and area for treaty-reserved and tribally controlled fishing activities, seafood production, and harvest for the benefit of tribal members.



NOTE: What about I-5/Slater and Loomis Trail? Need to add

B.13 Marine Infrastructure

Gooseberry Point

In 1986, the Lummi Nation purchased the Fisherman's Cove, which included real property at Gooseberry Point, a restaurant, store, marine repair shop, a boat storage facility, and a boat launch. The store, boat storage and launch are still in operation. The proximity to the San Juan Islands makes the launch popular with recreational and commercial boaters. However, the heavy use of the boat launch, which was constructed in the 1950s, has taken its toll.

The tribe has used the property for several successful business and government ventures, some of which continue to operate at Gooseberry Point while others have been relocated. The Nation feels the highest and best use of the area would be to make better use of the shorefront property and has for some time pursued a blend of public service and private business use. The major hurdle to date has been agreement with Whatcom County on ongoing Lummi Island Ferry issues.

Accomplishments:

- In 2015, the Bureau of Indian Affairs approved the conversion of the land from "fee to trust".
- In 2016, the Lummi Nation received a grant to improve the Gooseberry Point Pedestrian Pathway sidewalks.

Next steps include:

- (a) Development and assessment for Marina/Aquatic Center.
- (b) Develop an economic development plan with a tourism element; and
- (c) Assess the opportunities for new business and job creation.

In considering how the entire site property might be developed, reducing unemployment, and increasing incomes is a key consideration. It is anticipated that reaching the end goal will require additional capital and the Nation is committed to that end.

Aquaculture

In 1969 EDA funded \$3M for the Lummi Aquaculture Project for the purpose of carrying out research and feasibility studies for the purpose of an aquaculture development. The construction of a 750-acre aquaculture pond, a fish and shellfish hatchery commanded significant commitment of the energies and resources of the Lummi people. The Lummi Bay Hatchery rears young salmon to juvenile size, to ensure the survival of the local commercial fishing industry. The Lummi Shellfish and Oyster Hatchery is the third largest on the west coast; much of the annual production of over one billion oyster and clam seed produced is shipped to growers in the U.S. and Canada.

Ecotourism

The Lummi Indian Reservation is blessed with an abundance of beaches and hiking trails. Here, trail users can stroll along the beach, run for miles along Lummi Shore Road, and hike the Haxton Way Trail or around Portage Island overlooking the Salish Sea with amazing views of Mount Baker. These trails are easily accessible year-round, and you don't have to go far to find them. They can be accessed by foot, bike, public transit, or a short drive. However, Lummi Code of Laws, 13.01.040 of the Tidelands Code stipulates, "The Lummi tidelands are reserved for the exclusive use of the Lummi Indians by the Treaty of 1855. The

Lummi Tidelands are closed to persons who are not members of the Lummi Nation, in the absence of a lease permitting nonmember use of the tidelands, or use permits issued pursuant to this Title”.

B.14 Foreign Trade Zone #128

In 1986, the Lummi Nation was awarded a Foreign Trade Zone (FTZ) designation. Since then the Lummi Nation has owned FTZ #128, one of only five FTZs on an Indian Reservation, with two located on the U.S. west coast. FTZs allow for the import of foreign goods duty/tariff free. If a pre-described amount of value-added work is performed in the FTZ by American workers, the goods can then be shipped to US markets at a removed or reduced tariff. Because of the Reservation's proximity to Canada, the Lummi Nation saw the FTZ as the first step in becoming a regional portal to US-Canada trade. The nearby Port of Bellingham, also seeing the potential, applied for, and was awarded FTZ #129.

The subsequent adoption of the North American Free Trade Agreement (NAFTA) practically eliminated Canadian demand for the Lummi FTZ since Vancouver BC manufacturers, the most likely customer of the Lummi FTZ, could now ship many goods directly to the US tariff free.

With increased trade throughout the Pacific Rim, the Lummi Nation sees new opportunity for FTZ #128, and is open to discussing partnerships with outside investors.

B.15 Role in the Regional Economy

The Lummi Nation contributes tax revenues, purchasing power, economic development and jobs throughout Whatcom County, Washington State, and the rest of the United States. In 2012, the Lummi Nation contracted a third-party economist to quantify the economic and fiscal impacts of the Lummi Nation of the regional economy, state, and national economy.

Economic Impact Assessments

Economic impact assessments are meant to measure the effects of businesses or industries or other economic events within the bounds of geographies or other entities with identifiable boundaries. Economic impacts can be positive, negative or they can mitigate other impacts be they positive or negative.

Economic impact analysis is an important tool that is used by both business and government to make decisions about new projects, capital investments, the historical effects of past development and the potential effects of a new line of business or government project. For this project, the goal was to identify employment outcomes, spending effects and fiscal effects relative to government-based taxes and government expenses incurred or avoided.

Economic impacts can be direct, indirect, or induced. Direct impacts are generally the most obvious such as direct payroll or purchases or taxes paid. Indirect impacts are those generally associated with new business to suppliers of products or services; this new demand is in effect a multiplier on the original capital investment and the ongoing operations of the business being analyzed. Where direct and indirect positive economic impacts, there are positive wealth effects in those communities and industries that are in economic sphere of the growing enterprise and these are the induced effects. The total economic impact aggregates the direct, indirect, and induced impacts into one analysis.

Multiplier Effects

This analysis is primarily based on an input/output modeling structure. There are three primary types of multipliers used in this analysis: Employment, Output, and Income.

Employment multipliers identify the total change in the number of jobs in each of the associated areas of employment for each direct job or unit volume in payroll generated by the primary subject of the analysis.

Income multipliers represent the total dollar valued change in the income or earnings of households employed by all the industries for each dollar of payroll expended by the primary subject of the analysis.

Output multipliers represent the total dollar change in all industries that results from a dollar change in output delivered to final demand by the subject of the analysis. Technology, geography, inter-industry linkages or leakages of output, localization and other criteria affect value of the multipliers.

For this study we used multipliers from the Regional Input/Output Modeling System (RIMS II) maintained by the U.S. Department of Commerce's Bureau of Economic Research as well as a software package called IMPLAN. Multipliers are derived mathematically from empirical data pertaining to specific geographies, industries, and other attributes of economic systems.

Role of the Lummi Nation Government

In 1855, the Lummi Nation and the United States formally recognized one another and signed the Treaty of Point Elliott. The government of the Lummi Nation is the Lummi Indian Business Council (LIBC). Under the elected leadership of the LIBC, all governmental programs such as: General Government, Health Services, Education, Natural Resources, Public Safety, Economic Development, and others are managed for the citizens of the Lummi Nation. These departments perform everything from early childhood education and tutoring programs to family medical care and fish harvest management. Intergovernmental transfers, indirect income, taxes, licensing, permits, and enterprise revenue fund the government.

In 2020, the Lummi Nation employed 939 full-time staff and total payroll was \$39,636,908.

Role of the Lummi Nation Owned Enterprises

The Lummi Nation wholly owns two private companies, the Lummi Development Holding Company (LDHC) and Lummi Commercial Company (LCC). The LDHC, formed in 2010, manages the Lummi Nation Construction Company. Whereas the LCC, formed in 2001, manages a portfolio which includes 3 Lummi Bay Market Convenient Stores (the Lummi MiniMart, Fisherman's Cove Store, and Salish Village), Silver Reef Casino Hotel & Spa, Loomis Trail Golf, the Processing Plant & Dock. Taken together, the LCC's portfolio in 2020 provided approximately 531 jobs and a payroll of \$20,052,227.

Role of Lummi Entrepreneurs

Lummi Nation Owned Enterprises and entrepreneurial activities on the reservation have increased over the past year, with 982 business registered.

Not included are the contributions of the Lummi fishing fleet of 466 vessels (based on the 2018-19 boat registrations), the largest tribal fleet in the world.

If the Lummi Nation Owned Enterprises would had been included in the scope of the economic impact study, the economic contribution would have most certainly been even larger.

Workforce Development – Emerging or declining industry sectors – past, present, and future

The Workforce Development Division will bring together multiple perspectives and complementary needs from businesses, education and training providers, workforce organizations, and community resources to support the design, implementation, and sustainability of effective workforce development interventions.

Our goal is to facilitate collaboration among the economic development, workforce development and educational and training partners to align the workforce system by strengthening partnerships, guiding policy, and promoting career pathways.

- Individual workers are better supported in enhancing their skills, building careers, and advancing their work lives.
- Employers gain access to skilled workers and training opportunities
- Training providers gain insight to shape the content and increase the relevance of their offerings
- Community-based organizations gain access to pathways for their clients
- Create opportunities for clients/students to access industry recognized training and marked valued credentials
- Foster workforce development at the high school, vocational, trade and technical school levels – develop a lifeline chart, cradle-to-career, identifying programs available to assist
- Support student success in degree attainment

Training the next generation is critical to our economic success.

Lummi Nation is Generating Jobs

When calculating the number of jobs created by economic activity, we generally divide the jobs into three groups: Direct Employment, Indirect Employment, and Induced Employment.

Direct employment is primarily based on employees hired or contracted directly by the enterprise. These can be full time and part time and contractors. The numbers we post are representative of FTE's or Full-Time-Equivalents.

Indirect employment or jobs are jobs supported using business services and/or the purchases of products; for example, the purchase of office supplies, maintenance services for facilities, purchases of hardware or software, food, and other goods and services.

Induced employment or jobs are salaries and payrolls supporting, for example, local restaurants, gas stations and hotels, use of banks and grocery stores, computer stores and other and various service and product companies that supply direct and indirect employees, contractors, customers, and visitors.

The Lummi Nation creates jobs at in all three groups. First, is direct employment at the tribal government and enterprises. Indirect employment is created as the tribal government and enterprises make capital improvements and buy goods and services in the economy. Induced employment occurs as direct and indirect employees spend their income on goods and services.

In 2020, the Lummi Nation directly employed 1,535 workers for an aggregate payroll of \$62,839,815.

Impacts of Lummi Nation Created Jobs

Reduced Unemployment

In 2020, Washington State's civilian labor force was approximately 3,914,869 of which 346,600 were officially unemployed. In 2012, the Lummi Nation generated 3,625 jobs in the Washington State alone. We can assume that if not for the Lummi Nation, there **would have been** a full 1.1% more unemployed workers in Washington State.

Lower Costs to Taxpayers

The unemployed are eligible for both state and federal benefits, as well as their reduced incomes limiting their local purchases and taxes paid. In 2012, as a result of the Lummi Nation creating 4,827 jobs, taxpayers saved \$14,628,134 in unemployment benefits that the government would have been required to pay if those jobs had not existed.

Increased Government Revenue

In 2012, the Lummi Nation generated 3,625 jobs for Washington State workers and added to the State's revenue through State Indirect Business Taxes, Household Taxes, and Corporate Taxes totaling \$15,001,562.

In 2012, the 4,827 jobs created by the Lummi Nation paid \$31,039,967 in Federal Income Taxes. Furthermore, those jobs also paid \$31,660,766 in Social Security/Medicare Taxes. An additional \$16,576,789 were paid in Federal Proprietor Income Taxes, Federal Indirect Business (Excise, Duty) Taxes, Federal Households (Property, Fees) Taxes, and Federal Corporate Income Tax. In total, the jobs created by the Lummi Nation increased Federal Government revenues by \$79,277,522.

Overall Impact of the Lummi Nation

Simply put, the Lummi Nation is a major economic engine in the region:

- 1 in every 33 Whatcom County workers receives their paycheck from the Lummi Nation.
- The Lummi Nation is the second largest employer in Whatcom County.
- In 2012, the Lummi Nation Government and Enterprises spent \$112 Million on Goods and Services.
- Overall, the Lummi Nation's economic output exceeded \$496 Million.

From the buying of goods and services to the overall employment numbers, it can be said that the Lummi Nation certainly delivers a true economic stimulus to Whatcom County and the State of Washington.

"In the coming years, as the Lummi Nation continues to succeed, it will continue contributing thousands of jobs and billions of dollars to local, federal, and state treasuries."

- excerpt from Economic Impact of Lummi Nation Study

C. S.W.O.T. Analysis

A Strengths, Weaknesses, Opportunities, and Threats (SWOT) analysis is a strategic tool used to ensure that there is a clear objective informed by a comprehensive understanding of a region's capabilities and capacity. A SWOT Analysis identifies a region's competitive advantages as well as internal or external factors that can keep a region from realizing its potential. SWOT analysis elements are commonly defined as:

C.1 Strengths

Are a region's relative competitive advantages and are often internal in nature.

- Our Lummi reservation is a place of abundant natural resources that is reflected in the beauty of our landscape and the potential for economic and social prosperity
- Strong sense of community and place that sustains us
- The Salish Sea surrounds us, and the Lummi People have been fishing since time immemorial
- Active international border with Canada that offers significant economic opportunity for business expansion and more meaningful cross-cultural engagement.
- The proximity of Gooseberry Point to the San Juan Islands is unique – and valuable.
- For nearly 50 years, the Lummi Aquaculture Facility has served as a hatchery for producing shellfish seed (infant shellfish) annually for shellfish farms and regional enhancement projects throughout the west coast of the United States and Canada, but also a few customers as far away as India, Australia and New Zealand. The facility is the third largest operation of its kind on the U.S. west coast and the largest tribally owned operation in the world.
- Characteristics of the tribal government, Lummi Indian Business Council, that provides an advantage over others. Remarkable success in increasing communication and collaboration among business leaders.
- Characteristics of the non-profit, [Lhaq'temish Foundation](#), that provides an advantage over others
- Education widely available - Lummi Head Start/Pre-School/Early Childhood Education; Lummi Nation K-12 School; and Northwest Indian College - offers multiple 4-year degree programs
- Lummi Tribal Sewer & Water District - Having our own utility has afforded us the opportunity to grow our housing and business on the reservation.

C.2 Weaknesses

Are a region's relative competitive disadvantages, also often internal in nature.

- Topography - the Lummi Reservation is a peninsula surrounded by rivers and wetlands. Even the peninsula is covered in wetlands. This greatly reduces the amount of land that can be efficiently developed and makes roads more susceptible to annual flooding.
- High Cost of Physical Infrastructure - The introduction of non-Indian homes along the shorelines starting in the 1950s and land ownership policies covered in the Summary Background section had multiple detrimental effects on the Lummi Nation, as mentioned earlier. Those events were included in this CEDS not as a historical footnote, but because those events directly impact the Lummi Nation today and into the foreseeable future. One of the easily identifiable impacts was the inefficient development of reservation infrastructure – for example the need for three sewer treatment plants to serve less than 5000 people.

- **Lack of Natural Gas** - Because of the difference in cost between natural gas and propane, natural gas is a must-have for many businesses. However, natural gas service is available only on the northernmost edge of the Reservation, at the Silver Reef Casino. In fact, there was no natural gas service on the Reservation until 2002. Even though all the homes and businesses (and potential businesses) on the Reservation would benefit from natural gas, the natural gas companies have stated the customer density is too low to return a profit. Natural gas service, and the businesses that demand it, will not be realized without either state or federal investment.
- **Lack of Broadband** - A decade ago, through funding assistance from the EDA, the Lummi Nation completed an assessment of the broadband infrastructure. The overall situation was unsatisfactory then and little has changed. The Lummi Nation attempted to circumvent the high cost of physical lines exploring the use of wireless towers. However, the outcome of the study was that the reservation's topography (which in addition to the wetlands also includes a ridge that runs down the center of the peninsula), inefficient shape (a circle is preferable to a long, skinny peninsula, and high tree density made wireless impractical).
- **Education Gap** - The Lummi Nation has made huge strides in education attainment in the past couple decades. However, the education requirement for many jobs is higher than ever. Despite the Tribe's gains, there is still a gap between the level of education attained and the level needed for a job.
- **Taxation** - Tribal nations are nations, governments. Not businesses. Tribes must be able to collect tax as all governments do. Putting tribes on an equal footing with other taxing authorities in the United States respects the principle of the government-to-government relationship. In short, tribes must be the sole taxing authority on tribal lands. Preventing tribal governments from taxing is perpetuating an inequity.
- **Trust Jurisdiction** - Another major weakness that faces the Lummi Nation, and all tribal nations in the United States, is trust jurisdiction. Selling a piece of Trust property instantly converts it to Fee land. But for Tribes, the process of converting Fee land to Trust can take decades – as in the case of the Lummi Nation's property at Gooseberry Point. Furthermore, regardless if the land is within the previously ceded land of a federally recognized tribe AND it is taken into Trust, all the laws of the tribe may not automatically apply if it is not considered part of the reservation. All previously ceded lands taken into Trust, should automatically be treated as part of the pertinent tribal reservation.
- **The Office of Economic Policy** has limited staff and financial resources to move forward

C.3 Opportunities

Are chances or occasions for regional improvement or progress and are often external in nature.

- **Value Added Processing of Exotic Seafood** - China's Seafood Market China is the world's largest consumer of many things, including seafood. Depending on which study you read, China either A) doesn't produce enough to meet their own needs which explains why they are the largest seafood importer in the world; or B) does produce more than enough to meet their own needs which explains why they are the largest seafood exporter in the world. The reality is C) China is the world's largest importer, exporter, consumer, and producer of seafood. According to Chinese Customs data, China accounts for approximately 40% of total global production. While it seems odd that a country would be both the largest exporter and largest importer of anything, it's important to remember that "seafood" is a very broad category. Digging deeper into the statistics uncovers an import/export story that makes sense and reveals opportunities for the Lummi Nation.
- The Lummi Nation has a crab fishery that yields a considerable amount of product annually.
- Likewise, the Nation's divers continue to harvest sea cucumbers and other exotic seafood.

- And as earlier mentioned, the Lummi Aquaculture Facility has served as a hatchery for producing shellfish seed (infant shellfish) annually for customers around the world. It is easy to envision a grow process that extends past seed and moves into live oysters and geoduck small batch shipped to high-end markets in China and throughout the Pacific Rim.
- There are many funding opportunities for broadband infrastructure, but of course there are many challenges.

C.4 Threats

Are chances of occasions for negative impacts on the region or regional decline, also often in external nature.

- Impairment of the Marine Economy - The Lummi Nation is in extreme economic distress due to fundamental changes in the world salmon market, unprecedented low salmon prices and chronic low returns of salmon due to the lack of appropriate and effective actions to carry out the trust and fiduciary responsibilities of Federal government to the Lummi Nation and other tribal governments (i.e. ESA, US/Canada treaty and long term neglect of resources essential to the Tribes to maintain our Schelangen).
- Changes in the world salmon market are due to factors beyond the Lummi Nation's control, including the rapid growth in production of farmed salmon in foreign nations such as Chile, Norway, and increasing farm fish production in Canada and Washington State, displacing traditional markets for Lummi fishers and fishers in Washington, Oregon and California.
- In 2002, the U.S. Department of Commerce issued a Fisheries Economic Disaster Declaration for the Lummi Nation fisheries under the authority of the Magnusson/Stevens Act and this economic fisheries disaster is continuing well into the foreseeable future.
- Since the Lummi Nation Salmon Crisis began in 1999, the price paid for premium sockeye is 80% less and gross earnings from commercial fishing salmon harvest, in local waters, have fallen by 83%. The Lummi Nation is an economically distressed community that lacks economic alternatives to provide job opportunities for its membership which has endured a 40% drop in available jobs (At its zenith Lummi Nation fishing industry employed approximately 2,000 members of the Lummi Nation).
- The Lummi Nation government suffers from a severe reduction in marine tax revenues (approximately 50%), which pay for essential community services for all members of the Lummi Nation.

The fish is as important to Lummi people as the air we breathe and has provided our fishers and fleet of Lummi fishing vessels (formerly 700 vessels strong the Lummi Nation fishing fleet was equivalent to the naval resources of many countries), a modest livelihood in Coastal Salish waters.

- The Lummi Indian Business Council proclaimed and declared the Lummi Indian Reservation as an Economic Fishery Resource Disaster Area and provided notice to the U.S. Federal Government and the State of Washington that it expects them to meet their Treaty, trust, fiduciary and moral obligations to the Lummi Nation and its people.
- The Lummi Nation fishers who have been dependent on the commercial fisheries are in a state of transition and need number of services and financial assistance to survive in the intervening years as

the fishing industry transitions into new financial arrangements, business structures and appropriate marketing. The Lummi Nation fishing industry needs financial and technical assistance to plan, develop and implement the changes needed to reestablish their economic feasibility. And, the Lummi Nation needs financial and technical assistance to explore opportunities for economic diversification, all of which is needed to maintain the fishing industry as a viable part of the Tribe's and the region's economy.

- The Lummi Nation, in a government-to-government relationship, has requested the Whatcom County Executive and the Governor of the State of Washington to declare an economic fisheries disaster for the people in Washington State controlled fisheries and to grant and/or seek such assistance as herein requested and requests the President of the United States to grant or seek the assistance herein requested.
- LIBC is responsible for the protection, restoration, enhancement, and management of the natural resources within the exterior boundaries of the Lummi reservation and throughout the Lummi Nation's Usual and Accustomed (U&A) Fishing and Gathering Grounds and Stations. Natural Hazard events have occurred in the past and larger events can be expected to occur in the future on and near the Lummi Reservation and within the Lummi Nation's U&A.
- The Tribe will pursue needed research and research funding that taps the knowledge and skills of local people and organizations on the biology and science of salmon runs and other economically viable fish species of Washington and Canadian ecosystems.
- The Tribe will need funding to seek ways to improve marketing opportunities for Lummi Wild Salmon including retail and regional marketing.
- Flooding - The Lummi Indian reservation experiences both riverine and coastal flooding. Riverine flooding is caused by the Nooksack River which drains a watershed of approximately 786 square miles and discharges to Bellingham Bay, and partially to Lummi Bay during high flows. Most of the northern portion of the reservation is part of the Nooksack River floodplain. Coastal flooding on the reservation occurs primarily along the Sandy Point Peninsula, Gooseberry Point, and along the Hermosa Beach area. These are low-lying exposed stretches of the reservation shoreline.
- Many Lummi Nation members live in areas which are flooded, or have become isolated due to flooding and created an unsafe condition have required the evacuation of the entire Marietta Community and many individual tribal member families, necessitating evacuation to protect the health, safety and welfare of those affected.
- Infrastructure Improvements Fail to Materialize - As covered earlier, the high cost of infrastructure is a major weakness of the Lummi Nation. Yet, despite the high cost, not improving the infrastructure on the Lummi Indian Reservation is a huge disincentive for potential businesses.
- The lack of adequate broadband infrastructure threatens to worsen the digital divide and thereby place Lummi Reservation residents at a real disadvantage when they enter the job market.
- In addition, even though the Lummi Nation has invested substantially in improving the Sandy Point Wastewater and Membrane Bioreactor Wastewater systems, additional improvements will be needed to keep up with growing residential and commercial demand. Infrastructure improvements are a reality that must be dealt with. Not doing so threatens the sustainability of the Reservation economy.
- Tribal infrastructure planning processes tend to silo into grant-driven plans for retail development, housing, transportation, water, sewer, and power. It was suggested that the administration initiate support, technical assistance and budgeting in developing land use and strategic development planning to fit needs of the Lummi community.

- Water - The people of the Lummi Nation find that all reservation natural resources are interconnected and that the water resource has domestic, spiritual, cultural, social, and economic values that guide the appropriate use, management and protection of that resource and the conditions of all water and land use activities in the watershed, drainage basins of the reservation and all usual and accustomed areas. Water resources of the Reservation are to be protected and preserved, subject to the Tribe's obligation to protect its membership. All land, water or other resource strategies, decisions, or regulations shall consider the potential effect on all reservation natural and cultural resources.

Fisheries Since time immemorial, the Lummi people have fished, hunted and gathered throughout the traditional territories, including the waters of the Salish Sea, which rights have been secured in the Point Elliott Treaty of 1855 and confirmed by Federal Court decisions (U.S. District Court in U.S. v Washington (1974), and was upheld by the 9th Circuit Court of Appeals and the U.S. Supreme Court).

- Fisheries Alcohol and Controlled Substance Policy - LIBC Resolution 2017-070 (June 6, 2017) adopts the Fisheries Alcohol and Controlled Substance Policy. The LIBC has declared its intention of supporting families, youth, and the community in becoming a "Drug and Alcohol Free" environment and recognizes that it is most important to teach by example and action rather than just good intentions. Our families and individual members have fallen victim to alcohol and drug abuse, in every generation since the European people arrived on our shores. Many Lummis have suffered unnatural illness and death from their addictions and the tribe spends several million dollars per year to combat drug and alcohol abuse and its adverse effects on the community. Ensuring the safety of our fishermen and our families, and the protection of the resources of our Schelangen is essential to the future of the people. This resolution sets regulations that conditions the privilege extended to Lummi members to exercise treaty reserved rights to fish on submitting to and passing an annual and random alcohol and controlled substance test.
- Atlantic Salmon Catastrophe - On or about August 19, 2017, a catastrophic structural collapse of the Cooke Aquaculture open-net pen resulted in the release of thousands of farmed Atlantic salmon, an invasive aquatic species, into Pacific waters, adjacent to Cypress Island, just east of the Canadian border near Victoria B.C. The event is known as the "Invasive Species Spill". Multiple state agencies (Department of Ecology, Department of Fish & Wildlife, and Department of Natural Resources) were informed. A delayed response time by the State of Washington and Cooke Aquaculture Inc. resulted in the spread of this invasive species throughout the Salish Sea and into the river systems. Because of the failures to respond to the Invasive Species Bill, the Lummi Nation had to engage appropriately and quickly in the efforts to clean up and restore the Salish Sea. To remove these invasive species, tribal fishers and fish buyers were asked to assist in the clean-up of the spill. On or about August 29, 2017, the LIBC declared a State of Emergency in response to this Invasive Species Spill. The LIBC goals identified in response to this disaster are (1) to get the invasive species out of the water; (2) identify what caused the spill; and (3) quantify the impacts from the spill. The impact of the spill remains unknown on wild fish runs, some of which are federally protected under the Endangered Species Act. For Washington tribes the fish are both a competitive and ecological threat.
- Non-native community continues to move onto our reservation lands due to the beauty of our landscape
- Lack of infrastructure – natural gas, broadband, water/sewer

D. Economic Resilience

The Lummi Nation's economic prosperity is linked to its ability to prevent, withstand, and quickly recover from major disruptions to its economic base. Such disruptions could include general downturns that impact demand for locally produced goods and consumer spending; downturns in particular industries critical to the region's economic activity; and/or other external shocks such as a natural disaster, exit of a major employer, or the impacts of climate change. Economic resilience is incorporated throughout this report. The Summary Background and SWOT Analysis sections identify key vulnerabilities, while the Action Plan provides specific goals, strategies, and actions to encounter those vulnerabilities.

It is important to note that the CEDS update was prepared during the global COVID-19 pandemic. A time of unprecedented uncertainty as it relates to the public health and the economy. While the long-term impacts are largely unknown, the CEDS documents short-term impacts and responses to the pandemic in the region to the extent possible. While the pandemic presents many challenges to the regional economy, it also provides an opportunity to evaluate and improve the region's economic resilience.

In past years, the Lummi Nation has worked diligently with agencies and governments to respond to the needs of the community with the impacts of economic resiliency in removing barriers, supporting local efforts, and developing tools needed to prepare.

D.1 Lummi Nation Tribal Multi-Hazard Mitigation Plan

The LIBC is responsible for the protection, restoration, enhancement, and management of the natural resources within the exterior boundaries of the Lummi reservation and throughout the Lummi Nation's Usual and Accustomed (U&A) Fishing and Gathering Grounds and Stations. Natural Hazard events have occurred in the past and larger events can be expected to occur in the future on and near the Lummi Reservation and within the Lummi Nation's U&A. Defined hazard management policies and a coordinated hazard management plan with a focus on the homeland, will reduce the impacts of natural hazard events on the Lummi Reservation and within the Lummi Nation's U&A.

The LIBC adopted the [Lummi Nation Multi-Hazard Mitigation Plan](#) by Resolution 2015-107 (revised), as recommended by the Multi-Hazard Mitigation Team (Lummi Fisheries and Natural Resources Commission, Lummi Natural Resources Department Director, the Lummi Planning Commission, and the Lummi Law & Justice Commission). The first Lummi Nation MHMP was adopted in 2004 and was the first "State-level" plan approved by FEMA for all state and tribal governments in the United States.

The purpose of the MHMP is to guide current and future efforts to mitigate the impacts of natural hazards on the Lummi Indian Reservation. It shall also guide efforts to mitigate and respond to natural hazards that are generated off-reservation or that cross reservation boundaries in coordination with other agencies and jurisdictions as appropriate.

The Lummi Nation finds that natural hazards on the reservation have a direct, serious, and substantial effect on the political integrity, economic security, health, and welfare of the Lummi Nation, its members, and all persons present on the reservation. Further, the Lummi Nation finds that those activities that potentially increase the frequency or severity of damages from natural hazards, if left unregulated or unaddressed, will eventually cause such damages.

The MHMT assessed vulnerabilities of the reservation to natural hazards and found that the reservation is vulnerable to flooding, earthquakes, severe winter storms, windstorms, coastal erosion, drought, wildfires, landslides, tsunamis, volcano eruptions and tornadoes.

Because the Lummi Reservation is surrounded by at a near sea-level floodplain, catastrophic flooding is always a concern. The potential for a Tsunami to cause inundation of low-lying areas and catastrophic flooding with very little warning is a real concern. The Tsunami preparedness efforts of the MHMT resulted in the Water Resources Division obtaining a grant to install two All Hazard Alert Broadcast (AHAB) radios (aka Tsunami Warning Towers) on the Reservation and public education efforts.

A total of three Tsunami Warning Towers are installed on the Reservation. The tower on the Sandy Point Peninsula was purchased jointly by Washington State and the ConocoPhillips Refinery and complements the two-tower purchased by the Lummi Nation through an Emergency Management Preparedness Assistance Grant from Washington State. The AHAB towers were installed in 2007 and the Lummi Police Department tests the two towers purchased by the Lummi Nation each week (Fridays at noon).

(install tower pictures)

In 2009, a network of warning signs and tsunami evacuation route signs were installed by the MHMT in coordination with Washington State and Whatcom County. Public education takes place through *Squol Quol* (Lummi Newspaper) articles and the distribution of tsunami evacuation route maps that were developed in conjunction with Washington State.

D.2 Unemployment and Underemployment Services

Higher Education Program

Education is a priority of the LIBC. In 1989, as an act of self-determination, LIBC took the responsibility for administration of the Higher Education Grant Award process from the Bureau of Indian Affairs. This grant award assists students in fulfilling their goals, as well as meeting the ever-growing needs of our dynamic community. To keep pace with the rising cost of college tuition, they have augmented those BIA funds with tribal funding. This award is based on academic rather than financial need. This program has one FTE to administer the scholarships and to provide students through career development.

Dislocated Fisherman Program

By birthright, all Lummi Nation Tribal Members are fishers. Therefore, the continued impairment of the marine economy impacts every Lummi family. So even though an individual tribal member might not fish, it is often because of the stark reality that it is increasingly difficult to make a living doing so. The Lummi People are hard workers. If the fish were there, or it was economically worthwhile, many more Lummi fishers would be out on the water.

The U.S. Department of Commerce officially declared Lummi Nation a sockeye salmon industry disaster in 2002. The decline of the fishing industry has caused a large percentage of the local workforce to become dislocated from their traditional occupation of commercial fishing. Because of the severity of the problem the Lummi Indian Business Council established the Dislocated Fishers Program to provide training and placement services to commercial fishers and their crews.

The purpose of the Dislocated Fishers Program is to develop partnerships with training and education institutions, and employers to empower dislocated fishers to make effective training and career choices based on realistic self-assessment and comprehension of the world of work, resulting in self-sufficiency and achievement of life-long success. The program assists dislocated fishers in obtaining the employment, education and job training needed to establish a career path toward economic stability. The dislocated fishers are eligible for “core services” including skill assessment, labor market information, training program advisement and job search and placement assistance.

D.3 Cascadia Subduction Zone

The Pacific Northwest is home to the Cascadia Subduction Zone, a 1,300 km-long tectonic boundary between the Juan de Fuca and Gorda oceanic plates to the west and the North America continental plate to the east. The denser oceanic plates are converging with North America and subducting beneath the western edge of the continent. The interface between upper and lower plates is defined by a large fault, called a megathrust, as well as numerous smaller faults that cut through the surrounding crust (Fig. 2). Over time, frictional stresses accumulate along these faults, building slowly until they exceed the fault’s strength, resulting in an earthquake. Subduction zone earthquakes are the largest on Earth, reaching magnitudes more than magnitude **M9**, and are known to generate large tsunamis.

It can generate a “great earthquake” at any time, and can cause widespread damage, depending on the size, the duration and type. Watch this great video on the Cascadia Subduction Zone earthquake threat produced by the [Oregon Department of Geology and Mineral Industries](#); and [Washington State](#).

D.4 Global Warming

In the Pacific Northwest, climate change may affect the coastal marine environment by increasing ocean temperature, increasing the vertical stratification of the water column (reducing mixing which is important to the marine food chain), changing the intensity and timing of coast winds and upwelling.

The U.S Fish and Wildlife Services are collaborating with climate researchers to develop an understanding of climate change effects in the Pacific Northwest, and how to manage fish and wildlife resources considering these effects.

Climate change impacts Tribal Nations’ access to traditional foods. Fare such as salmon, shellfish, crops, and marine mammals have provided sustenance as well as cultural, economic, medicinal, and community health for countless generations. Some plants used for medicines and food are becoming increasingly difficult to find or are no longer found in historical ranges. Subsequent shifts from traditional lifestyles and diet – compounded by persistent poverty, food insecurity, the cost of non-traditional foods. Climate change threatens traditional ways of life.

D.5 COVID-19 Pandemic

(see Addendum – Lummi Nation Economic Recovery and Resiliency Plan

E. Strategic Direction

E.1 Mission & Vision Statement

*“To Preserve, Promote, and Protect our Schelangen”
per LIBC Resolution 2012-025*

The mission of Office of Economic Policy is to analyze, plan, implement and administer government economic policies and actions necessary for increasing the standard of living of Lummi Tribal members and improving the sustainable economic health of the Lummi Nation to preserve, promote and protect our *Schelangen* way of life.

Based on this mission, the department is well-suited to collect and analyze information on the Reservation economy, identify strategy options, assess the resiliency of the Lummi economy, and prepare implementation plans as elements of the CEDS. Furthermore, the department is very familiar with the LIBC Policies, Lummi Code of Laws, and cultural protocol and therefore can ensure compliance of CEDS objectives with the regulations of the Lummi Nation.

E.2 Goals & Objectives

The following list of Strategic Goals is the culmination of several years of (A) Analysis of the Lummi Nation Economy; and (B) Community Involvement & Input. It reflects the vision of the General Council, while adhering to the Department of Commerce’s requirements for the Comprehensive Economic Development Strategy including economic resiliency.

The LIBC held an Annual Retreat on December 3-7, 2020, to review previous General Council priorities, review and consider the discussions and requests of the General Council special meetings, and review the 2020 LIBC Priority List. The LIBC mutually agreed and acknowledge that the preservation of Lummi Nations Sovereignty and Treaty Rights are of the utmost value and is acknowledged in our vision and mission of the Lummi Nation.

Sovereignty and Treaty Rights

Promotion of sovereignty through strengthened self-governance compact and agreements, protecting our Treaties, and promoting self-determined responsibility to our services to the nation

Objectives:

- Strengthen governmental infrastructure
- Update codes
- Negotiate Self-Governance Compact
- Improve CBC Structure
- Constitution Reform
- Strengthen Personnel policies and succession planning
- Comprehensive Community Plan

- Strengthen engagement with external governments to focus on taxation, gaming protection, general welfare exclusion, water, licensing, and protection of treaty fisheries.

Economic Development

Approve and implement a comprehensive plan to diversify the economic investments and development.

Objectives:

- Diversity economic investment
- Plan for the success of our Businesses and Construction Projects
- Improve Broadband – the world around us is being disrupted by the acceleration of technology into more industries and more consumer applications. Society is reorienting to a new post-pandemic norm. And the loosening of federal monetary policies has pushed more dollars into the venture ecosystems at every stage of financing.
- Identify potential funding partners
- Realty/Land acquisition

Education

Invest in education and create a comprehensive plan to address growth and the needs for programs at all levels and educational opportunities.

Objectives:

- Approve and execute education code
- Develop culture center plan
- Plan for educational success from Early Learning and beyond High School
- Improve Lummi Higher Education scholarship with focus on beyond Bachelors
- Improve access to technology
- Invest in Lummi Youth Education
- Workforce development, training, and apprenticeship – transition members into tribal workforce

Judicial

The safety and general welfare of our members is safeguarded through conventional and alternative legal services.

Objectives:

- Update codes and laws
- Judicial Reform – develop an evaluation procedure for evaluation of courts, judges, police officers and child welfare
- Develop a strategic plan to address establishing the ne schaleche court to serve customary adoption and other needs
- Improve Public Health and Safety for our people – prevention – during pandemic/health emergency

Health & Wellness

Healthcare and social advancement for all current and future members.

Objectives:

- Promote public health, safety, and prevention
- Plan for elder care
- Invest in our youth
- Plan for community growth – healthcare, childcare, housing, fishing, and self-sufficiency
- Address shortfalls of Medicaid as a primary healthcare service

Community Development

A comprehensive approach will be utilized to reach the goal of increased economic vitality for the region.

Objectives:

- Plan to remove or circumvent barriers for property development
- Strategic plan for cemetery
- Reliable Transportation

Communications

Govern communications of Lummi vision and priorities within the community all government partners

Objectives:

- Improve communication with the General Council
- Improve communication internally between LIBC members and the organization
- Improve communication externally at the federal, state, and local levels
- Secure platform to communicate with the General Council

E.3 Projects List/Action Plan

Lummi Tribal Health Clinic

The new medical clinic for the Lummi community is of the highest priority to support the expansion of health care services for the growing population. The healthcare facility is approximate 50,000s.f. The building's completed design will be guided by the basic parameters established in 10% design, the project site, general aesthetic vision express in the renderings, and general building orientation and configuration.

Estimated Cost: \$38,500,000

Detox Center

LIBC declared a public health crisis in 2017 to end illegal drug use on the reservation in response to the impact of the opioid epidemic. The development and construction of a medical detox center is underway.

Estimated Cost: \$8,577,275

Methadone Clinic

A methadone clinic is a place where a person who is addicted to opioid-based drugs, such as heroin or prescription painkillers, can receive medication-based therapy. Patients receive Methadone, or the brand-name version known as Dolophine, which is an opioid analgesic.

Estimated Cost: \$X

Water Biosolids Site

The LIBC recognizes that the Lummi Tribal Sewer & Water District's current Biosolids 39-acre site is near capacity and requires a 51-acre site to accommodate growth in the community, and up to 71-acres by 2038. The installation of solar panels in the 100-foot buffer zone around the entire site will be considered too.

Estimated Cost: \$1,600,000; \$175,000 Annually

Slater Road Elevation

Elevation of Slater Road, 1,900 linear feet of roadway, 12 feet above the flood stage, between the Nooksack River Bridge and the BNSF Railroad tracks.

Estimated Cost: \$15,000,000

I-5 Slater Interchange

Construct on/off ramp roundabouts along I-5 at exit 260 where they intersect Slater Road. Traffic studies show the surrounding interchange will experience more traffic due to rapid growth in the area within the next decade.

Estimated Cost: \$21,100,000

Broadband/Telecommunications

Construction, improvement or acquisition of facilities and equipment needed to provide broadband service by establishing a fiber backbone throughout the reservation.

Estimated Cost: \$11,000,000

Broadband/Feasibility Study

Feasibility study to define a business plan for the development of a retail broadband internet enterprise to serve its reservation residents, tribal government facilities, healthcare, schools, and public safety.

Estimated Cost: \$50,000

Solid Waste Management/Refuse Site, Sanitation and Recycling

The Solid Waste Management project would be a recycling, garbage, and waste disposal center, serving the Lummi community.

Estimated Cost: \$TBD

Salish Village Business Cluster

A multi-phased project including commercial site development - water/sewer, natural gas, roads, trails, broadband and outpads.

Estimated Cost: \$5M Wetland Mitigation

Gooseberry Point Business Cluster

A multi-phased project including commercial site development

Estimated Cost: \$TBD

Legoe Bay Business Cluster

A multi-phased project including commercial site development

Estimated Cost: \$TBD

Lummi Nation Community Park

The 40-acre park to be completed in two phases will have two multi-purpose fields for baseball, softball, soccer, and lacrosse and outfitted with portable outfield Little League fencing, a loop trail, one restroom and a 94-space parking lot.

Estimated Cost: \$4.2M

Technology Training Center

A digital equity program for seniors, unemployed residents, those experiencing homelessness, residents who face barriers to accessing digital services during this period when there is an increased reliance on the internet to access public services and economic relief resources available in response to and recover from the COVID-19 pandemic.

Estimated Cost: \$8M

Commodity Foods

USDA has provided grant funds to improve services by building a corridor to connect two warehouses for the movement of goods with a forklift. The remodel includes updated electrical and data components, structural improvements, installation of fireproof doors, and interior paint.

Estimated Cost: \$TBD

Olsen Subdivision, Phase 1

The project provides for the improvement of approximately 1025 linear feet of paved road and utilities for a new subdivision off Lummi View Drive. The work to be performed under this contract includes, but is not limited to, installation of curb, gutter, sidewalk, asphalt road, water and sewer mains and services, storm pipe and catch basins, storm water treatment pond, signing, pavement markings, temporary erosion control, and traffic control.

Estimated Cost: \$TBD

Vehicle Charging Stations

Installation of four Phase II and one Phase III charging stations on trust land. Three at government offices and one at the Lummi Bay Market.

Estimated Cost: \$TBD

Headstart Early Learning Expansion

The LIBC recognizes that our youth represents the fastest growing population and recognizes that community-based efforts improve their quality of life. The purpose of early learning is to provide early learning and education services for children and their families, to address the needs in a community-based setting, to strengthen the family unit, and to promote healthy early learning development.

Estimated Cost: \$2.2M

Museum/Cultural Center***Kwina Road/Marine Drive/Lummi Shore Roundabout Project***

Construction of a roundabout to replace 4 minor stop-controlled intersections which have 8 deficient left turn movements. A Road Safety Audit noted the following safety issues: Insufficient lighting, sight distance problems, shoulder width & condition, signing-marking issues, wayfinding. The construction of a roundabout would improve traffic flow, increase mobility and improve safety for vehicles, public transit,

bicycles and pedestrians, provide a gateway to the Lummi Nation and beautify Northwest Indian College's Campus roadway network.

Estimated Cost: \$X



Please see the Project List in the Appendix B.

F. Opportunity Zones

The Opportunity Zone tax incentive is a powerful new tool meant to bring private capital to underserved communities. However, economically distressed communities require more than private capital alone. Many of these communities are in need of public-sector support and regulatory streamlining to ensure they develop the foundations necessary to support a thriving private sector. Public investment in economic development, entrepreneurship, education and workforce training, and safe neighborhoods – along with guidance for engaging with investors and entrepreneurs – will help communities unlock private capital to create sustainable growth. This public-sector investment serves as a means by which to attract and continue the flow of private capital-investment into Opportunity Zones.

The federal tax bill passed in December 2017, allowing Governors to designate a portion of eligible census tracts as Opportunity Zones. Investments made by individuals through special funds in these zones may defer or eliminate federal taxes on capital gains. Each state Governor can designate up to 25% of census tracts that either have poverty rates above 20 percent or median family incomes of no more than 80 percent of statewide or metropolitan area family income or meet other specified criteria.

In other words, Opportunity Zones are designated low-income census tracts where tax incentives are available to encourage those with capital gains to invest in low-income and undercapitalized communities.

Acknowledging this need, President Donald J. Trump signed Executive Order 13853 on December 12, 2018. This Order established [White House Opportunity and Revitalization Council](#) to carry out the Administration’s plan to target, streamline, and coordinate Federal resources to be used in Opportunity Zones and other economically distressed communities. This public-sector commitment overlays the Opportunity Zone tax incentive in the Tax Cuts and Jobs Act. Together, private capital and public investment will stimulate economic opportunity, encourage entrepreneurship, expand educational opportunities, develop, and rehabilitate quality housing stock, promote workforce development, and promote safety and prevent crime in economically distressed communities. State, local, and tribal leaders have an opportunity to leverage the work of the Council and to also conduct similar reviews of their own programs and regulations.

Governor Inslee nominated [tract number 53073940000](#) in Washington State, which qualifies on both poverty rate and median family income. The 21 square mile census tract also has opportunities for additional investment that could complement the tremendous investment already made by the Lummi Nation.

Overview of Census Tract 9400



The Lummi Nation appreciates knowing that the Opportunity Zone initiative is a top priority of the EDA and a lot of additional support is provided to those identified as an OZ.

Opportunity Zones designed to spur economic development by providing tax benefits to investors. First, investors can defer tax on any prior gains until the earlier of the date on which an investment is sold or exchanged, or December 31, 2026, so long as the gain is reinvested in a Qualified Opportunity Fund. Second, if the investor holds the investment in the Opportunity Fund for at least ten years, the investor would be eligible for an increase in basis equal to the fair market value of the investment on the date that the investment is sold or exchanged.

Several upcoming projects have been identified and meets the special need eligibility requirement. LIBC's most recent project progressing on its own is the Lummi Tribal Health Clinic. Other upcoming projects include Housing, Retail, NWIC Expansion, Technology Training Center, Gooseberry Point Marina, Foreign Trade Zone, and a Museum. The Lummi Nation would be open to an Opportunity Zone investment.

In a presentation made to multiple stakeholders in Whatcom County, we identified opportunities and incentives of doing business with the Lummi Nation. They include:

- **Historically Underutilized Business Zone “HUBZone”** – which seeks to create jobs in historically depressed areas, which includes “lands within the external boundaries of the reservation”.
- **Foreign Trade Zone “FTZ”** – the Lummi Reservation is the home of FTZ #128. Indian and non-Indian businesses involved in international trade, which locate on the Lummi Reservation can defer, reduce or in some instances eliminate U.S. Custom duties on products imported or exported through the Lummi FTZ. In addition, as a matter of federal law, State and local valorem taxes cannot be imposed upon imported tangible personal property stored or processed on the reservation FTZ, or produced in the U.S. and held in the FTZ for exportation in its original or processed form.
- **Empowerment Zones** – designated by the Secretary of Housing and Urban Development and the Secretary of Agriculture, are areas with conditions of poverty, high unemployment, and general economic distress. The benefits of locating within the Lummi reservation EZ includes employment credits, a 0% tax on capital gains, increased tax deductions on equipment, and accelerated real property depreciation.
- **State/County Land Use Exemption** – If a non-Indian company seeks to build a facility of trust lands, the development will be exempt from local, county, and state zoning and land use restrictions. As such, the business could save a significant amount of time – and time is money – by avoiding, among other things, State permitting requirements.
- **Buy Indian Act** – within the discretion of the Secretary of the Department of the Interior, that Indian labor shall be employed, and purchases of the products...of Indian industry may be made in open market. This Act gives Indian businesses a strong opportunity to obtain government contracts. Similarly, the Secretary of DHHS may use these principles in the acquisition of hospital and health facilities for Indians and related health conservation.
- **Indian Incentive Program** – is a Congressionally sponsored program, originating from the Buy Indian Act, that provides a 5% rebate to Department of Defense prime contractors, with a contract of \$500,000 or more, on the total amount paid to Indian-owned economic enterprises or Indian organizations.
- **SBA 8(a) Business Development Program** – offers a broad range of assistance to businesses with at least 51% tribal ownership. The program helps small businesses gain competitive advantages

and build business savvy. Section 8(a) participants may take advantage of specialized business training, counseling, marketing assistance and high-level executive development provided by the SBA. Tribal businesses, as well as individually owned Indian businesses, can apply to participate in this program.

- **Federal and State Tax Savings** – several federal and state tax benefits are available for non-Indian businesses that partner with Indian-owned businesses or employ members of Indian tribes. The exact tax benefits available depend on the specific nature of the business involved.
- **Unique Financing Opportunities** – developing businesses on Indian lands and/or partnering with tribal governments offers a variety of unique financing opportunities for non-Indian businesses.
- **Tribal Sovereignty** – Native American tribes consider ‘sovereign immunity’ to be crucial for the protection of tribal resources and the promotion of tribal economic and social interests. A sovereign state is one that is independent from all other authority, retaining the right and power to regulate its internal affairs without foreign interference. Sovereign immunity is the doctrine that precludes the assertion of a claim against a sovereign without the sovereign’s consent. Indian Tribes are sovereign entities. Tribal sovereignty is not granted to tribes by the United States but rather reserved as inherent in their status as governments predating the formation of the United States. The fact that the colonizing nations, and subsequently, the U.S. government entered into Treaties with tribes supports this.

G. Evaluation Framework

Evaluation is essential to successful implementation. Ongoing evaluation will take place to measure progress on the goals and objectives, analyze performance metrics, economic trends, and benchmark against other regions to identify opportunities. Partner agencies will be integrated into evaluation efforts when appropriate.

G.1 CEDS Review

Ensuring the enduring survival of the Lummi homeland, culture and people requires undertaking modern economic aims and progressive measures while preserving and protecting the land, sea, air, and traditions of the *Xwlemi*. The Office of Economic Policy has developed a Comprehensive Economic Development Strategic Plan to meet that goal.

Progress Reports

The Lummi Indian Business Council's, Office of Economic Policy, will implement the CEDS and Progress Reports. At the Lummi Indian Business Council, direction was provided to submit a report specifying each activity's progress in achieving the benchmark goal identified in the Work Plan, impact of increasing employment, and contributions to the overall return on investment.

Mid-Year Report

Each year the progress reports will be summarized into a Mid-Year Report which will be forwarded to EDA. The document will be intended to meet the Commission's commitment, as part of the EDA Grant agreement, to provide the EDA with a Mid-Year Report.

Annual Report

Each January, the Office of Economic Policy will submit an Annual Report to the Lummi Indian Business Council, which in turn is shared throughout the Lummi Nation. The purpose of the Annual Report is to:

- Document and distribute, for widespread evaluation by the members of the Lummi Nation, the progress of the departments in implementing the previous year's Work Plan.
- Provide a means to solicit community input in development of a work plan for the coming year.
- Serve as a reference tool and an official record, to be stored in the Lummi Nation Archives for future generations and public inquiries, or the economic development accomplishments, shortfalls, and lessons learned for that particular year.
- Set benchmark measures and criteria by which to determine the effectiveness of the department's use of funding dollars in achieving the goals of the community. This evaluation sets the foundation for funding in the upcoming Lummi Nation Budget Process.
- Meet the Economic Development Division's commitment, as part of the EDA Technical Assistance Grant Agreement, to provide the EDA with an annual report.

Performance Metrics

The LIBC has several initial performance metrics to work toward under this CEDS. Performance Metrics work to track progress of the overall implementation of the CEDS as required by EDA. Annual updates will be shared with partners and stakeholders, as well as the general community, to understand how we are doing and what we can do better.

The region shows the following performance metrics:

Population – The Lummi Nation population is 5,641, with 51.3% AIAN (2,894) and 48.7% (2,747) other. There are 2,894 American Indians on the Reservation, according to the 2019 ACS 5-year estimate.

Housing – There are 2,273 households located on the Reservation, with 1,966 occupied and 307 vacant. Of the 1,966 homes on the Lummi Indian Reservation 65.8% (1,294) are owner-occupied housing units, and 34.2% (672) are renter-occupied housing units. The average household size is 2.84.

Median Household Income - A median household income of approximately \$54,000, which is 32% lower than the median household income for the State of Washington of \$79,000

Per Capita Income - The per capita income of a Lummi Tribal Member living on the Lummi Reservation is even less than the \$25,992. Per capita income is \$30,586 for Whatcom County; \$36,888 for Washington State; and \$32,621 for the United States.

Poverty Rate - The poverty status in the past 12 months is 29.3% below poverty level, and 4.6% at or above poverty level.

Unemployment Rate – According to the American Community Survey (ACS), the unemployment rate for the Lummi Nation is 8.2% with a light margin of error of 4.5%. The computation of the unemployment rate considers all those who are 16 years and over. Those in the labor force are self-identified as being employed whether they are institutional, governmental, private sector employees or self-employed.

Median Home Value - The median home value is approximately \$270,000 which is 31% lower than the median home value for the State of Washington of \$390,000.

Education - A percentage of population with a high school diploma is approximately 88%, which is 4% lower than the rate for the State of Washington of 92%.

Median Age - A median age of approximately 37, which is 3% lower than the median age for the State of Washington of 38.

Veteran Status – 4.1% AIAN's on the Lummi Indian Reservation are veterans.

G.2 CEDS Amendment

Annual Revision

The Office of Economic Policy will review LIBC staff reports and submit their own findings quarterly to the Budget Committee through the Commission representatives.

The Budget Committee comprised of technical support staff determine department progress in achieving community goals and then allocate funds accordingly.

The purpose of the community-based makeup on the Budget Committee is to increase the opportunities for members of the Lummi Nation to participate in the budgeting process and to help set the Lummi Nation's priorities for the coming year, such as goals in the CEDS. The LIBC recognizes the importance of the involvement and support of the tribal community in tribal government and desires to improve the

opportunities for tribal members to effectively participate in the most crucial of government processes, the fiscal budget.

Overview of the Budget Process

The annual budgeting process will require approximately three to seven months to prepare and adopt a budget for the coming fiscal year. The budget cycle begins in January with a report to the members of the Lummi Nation on how the Lummi Nation's funds were used in the previous year. On or before the last working day of January, the Treasurer will publish a calendar setting the timelines for the next year's budget cycle. This calendar is to be presented to and approved by the LIBC prior to publication.

- a) The initial public hearing will provide the community with an opportunity to express support or dissatisfaction with existing tribal programs and activities. Approximately one to six months later, after the community has been informed of LIBC's best estimate of plans and funds expected to be available for appropriates in the coming year, the LIBC will conduct a second public hearing to discuss the community's priorities for use of these funds.
- b) The LIBC will then retreat to consider the community input and tribal needs and to develop the Business Council's appropriation priorities that will guide the LIBC Treasurer and the Budget Committee in their preparation of a Draft Budget.
- c) Once the LIBC has considered and approved a Draft Budget, a third public hearing will be held to explain the expenditure plan to the community and to solicit additional budget comments and recommendations from the Lummi membership.
- d) The Budget Committee will then consider these comments, and where appropriate, amend the draft budget and develop a proposed final budget and adopt a Final Budget Resolution by November. The approved Budget shall not obligate more funds than are reasonably expected to become available for expenditure in the coming year (a "balanced budget" is required) and will guide all tribal spending throughout the coming year.
- e) Reports shall be presented in a format that is easy to read by non-financial persons.
- f) The Budget Committee will review the approved budget at least three times during the year to monitor budget compliance and to measure actual revenues with the forecasts.

The Budget Committee will recommend modifications to the LIBC when needed to avoid expending more money than is available. The LIBC will be required to amend the Budget when necessary to maintain a balanced budget.

Once the Annual Work Plan and other amendments to the CEDS have been completed, the CEDS for that year will be approved by Resolution of the Lummi Indian Business Council. A copy of the amended CEDS will be submitted each year to the EDA for their records, as outlined in the EDA Grant Agreement.

Year Five

Renewal every fifth year from the submission of the original CEDS, the Office of Economic Policy will update the Work Plan for the following year and the entire Lummi Nation Comprehensive Economic Development Strategy, assess the membership of the CEDS Committee, and determine how economic development efforts can best serve the Lummi Nation.

CLOSING REMARKS

The Lummi Nation greatly appreciates the cooperation and collaboration of the EDA Seattle Area Office, particularly Sharon Metiva, in providing the time and resources necessary to overcome substantial staff turnover. The Lummi Nation has always enjoyed having a productive relationship with the U.S. Department of Commerce, Economic Development Administration and envisions building an even stronger relationship in years to come.

Hysh'qe = Thank you!

APPENDIX A – The Governing Body of the Lummi Tribe

Per the [Lummi Constitution](#), the governing body of the Lummi Tribe is a business council consisting of eleven (11) members duly elected to serve for a three-year term, provided that a minimum of seven (7) members must live on the reservation.

1	Position A	Term expires Nov 2023	Maureen Kinley, Council Member
2	Position B	Term expires Nov 2023	Terrance Adams, Council Member
3	Position C	Term expires Nov 2023	William Jones Jr., Secretary Council Member
4	Position D	Term expires Nov 2023	Yvonne Cagey, Council Member
5	Position E	Term expires Nov 2021	Nickolaus Lewis, Council Member
6	Position F	Term expires Nov 2021	Henry Cagey, Council Member
7	Position G	Term expires Nov 2021	Travis Brockie, Vice-Chairman Council Member
8	Position H	Term expires Nov 2022	Lisa Wilson, Council Member
9	Position I	Term expires Nov 2022	Kathy Pierre, Treasurer Council Member
10	Position J	Term expires Nov 2022	Lawrence Solomon, Chairman Council Member
11	Position K	Term expires Nov 2022	Clifford Cultee, Council Member

The LIBC provides social, economic, and governmental services for the enrolled membership of the tribe and Reservation residents through six (6) primary executive departments:

1. Office of Economic Policy
2. Education
3. Health & Human Services
4. Law & Justice
5. Natural Resources
6. Planning & Public Works

The LIBC also consists of ancillary administrative departments that provide support services to the (7) executive departments:

1. Accounting
2. Finance
3. Human Resources
4. IT
5. Funding
6. Cultural
7. Legal

The administrative structure of the Lummi Indian Business Council reflects its long-term experience and commitment to the provision of services for implementing the Nation's goals and objectives.

APPENDIX B – The 2021 Project List

Project Name	Location	Description of Project	Project Type	Estimated Cost	Potential Funding Source(s)
Lummi Nation Lummi Indian Business Council					
Government Projects					
<u>Health:</u>					
Lummi Tribal Health Clinic	Lummi	A new medical clinic for the Lummi community is of the highest priority to support the expansion of health care services for the growing population.	Tim Ellis	\$38,500,000	USDA Loan
Detox Center	Lummi	LIBC declared a public health crisis in 2017 to end illegal drug use on the reservation in response to the impact of the opioid epidemic. The development and construction of a medical detox center, a necessary service. A 17,400 sf building is proposed.	General Mgr LTHC Director BH Director Council	\$10,230,264	WA Dept of Health Behavioral Health \$1,960,000 + 3 rd Party Billing
Suboxone Clinic	Lummi	A methadone clinic is a place where a person who is addicted to opioid-based drugs, such as heroin or prescription painkillers, can receive medication - based therapy. Patients receive Methadone, or the brand name version known as Dolophine, which is an opioid analgesic.	Rene Ramirez	\$1,253,242	3 rd Party Billing
Solar/Renewable Energy	Lummi	Construct solar on rooftop and geothermal of the NEW Lummi Tribal Health Center	Economic Development Planning Public Works Health	\$1,300,000	DOE – Energy Infrastructure Deployment on Tribal Lands
<u>Education:</u>					
Lummi Nation School	Lummi	-renovate the LNS bldg. to add lighting and other amenities needed by Special Education Students -classroom space for K-1, Lummi Cultural Arts & Lummi Language Arts, Indigenous Plants Nursery, Career Technology Education, Marine Trades Program, Health Classes, Physical Therapy, Sports Medicine -Expanded Comprehensive School Based health Services Examination Rooms, Counseling Rooms,	Bernie Thomas	TBD	TBD

		<p>Family Therapy Conference Room, Dentist, Dental Hygienist Exam Room</p> <p>-add Locker Room for co-curricular, extra-curricular sports</p> <p>-add expanded bleachers, public address system at Blackhawk Stadium</p> <p>-add six USTA Tennis Courts, lighted – and used for pickle ball, paddle ball</p> <p>-add Cross Country Trail Course around school campus</p> <p>-Security Guard shack with web enabled gate</p> <p>-Two baseball, two softball fields, lighted</p> <p>-Lighted sidewalk connecting McKenzie Housing with LNS and Little Bear Creek Facilities</p> <p>-Lummi Education Board Room, Administration Office</p>			
<u>Natural Resources:</u>					
Skookum Creek and Lummi Bay Hatcheries Infrastructure Projects	Lummi	Hatchery Infrastructure Improvements to implement the Lummi Co-Manager agreed 10 year hatchery production plan per LIBC RESO 2015-042 to provide an increase in harvestable salmon to the Lummi community. Also to transfer Skookum Creek from Fee to Trust status.	LNR Dept	\$ 3,343,953	EDA- ARPA Indigenous Communities
Lummi Bay Shellfish Hatchery	Lummi	<p>Shellfish hatchery infrastructure improvements to modernize shellfish operations and rehabilitate the Lummi Bay dike.</p> <ul style="list-style-type: none"> • FLUPSY House for FLUPSY Operation: \$2,960,760 • New Clam Plant Building: \$846,563 <p>Phase II of FLUPSY Floats improvement: \$858,000</p>	LNR Dept Others	\$4,665,323	EDA- ARPA Indigenous Communities
<u>Workforce Development:</u>					
Entrepreneurship Assistance	Lummi	A place that provides instruction, training, technical assistance, counseling needs and support services to new and aspiring entrepreneurs.		TBD	
Communication Platform	Lummi			TBD	

Government infrastructure					
<u>Water:</u>					
Water Treatment Plant Upgrade	Lummi	Phase I costs include design cost, construction cost, construction phase engineering, and administration cost	Planning LTSWD	\$13,027,000	
I-5 Utilities – Water & Sewer	Lummi	Water line extension from the LTSWD lines located at the corner of the Silver Reef Casino to the Salish Village Site at I-5. Feasibility Study needed.	Planning LTSWD LCC	\$7,000,000	EDA ARPA Build Back Better
SCADA for ATP & NW Wells (Water)	Lummi	SCADA is a computer-based system for gathering and analyzing real-time data to monitor and control equipment	LTSWD	\$85,000	
<u>Sewer:</u>					
Biosolids Site – Chief Martin	Lummi	The LIBC recognizes that the Lummi Tribal Sewer & Water District's current BioSolids 39-acre site is near capacity and requires a 51 acres site to accommodate growth in the community, and up to 71 acres by 2038. The installation of solar panels in the 100-foot buffer zone around the entire site will be considered. <i>LIBC Reso 2020-129</i>	LTSWD Public Works Planning Economic Development	\$1,600,000 \$175,000 Annually	
Membrane Project – Kwina Road MBR WWTP	Lummi	District staff discovered that 25% of the membranes installed in 2017 were damaged and are halfway through the warranty period of 8 years as stipulated by the contract. Most of the membranes damaged beyond repair. Ovivo USA LLC was notified of the warranty claim and has offered a replacement and cost reduction after negotiations between Ovivo and the District engineers and legal counsel.	LTSWD	\$1,000,000	
LTSWD Administration Bldg	Lummi	Managing and operating a small water and sewer system is a big responsibility and investment in a new Administration Headquarters building is necessary.	LTSWD	\$275,000	
Update W&S Facilities Plans (Water & Sewer)	Lummi		LTSWD	\$150,000	
Pump Station 9 (Sewer)	Lummi		LTSWD	\$825,000	

SCADA for 5 Sewer Pump Stations (Sewer)	Lummi	SCADA is a computer-based system for gathering and analyzing real-time data to monitor and control equipment	LTSWD	\$150,000	
Conveyance from pumpstation 10 to Gooseberry WW Facility	Lummi		LTSWD		
<u>Roads:</u>					
Slater Road Elevation and Bridge Project	WA, Whatcom County, Lummi, Ferndale	The Road and Bridge project investment will have significant transportation and economic impacts. Elevation of Slater Road, 1,900 linear feet of roadway, 12 feet above the flood stage, between the Nooksack River bridge and the BNSF Railroad tracks; and replace outdated bridge carrying Nooksack River flows under the roadway with a new bridge span.	Economic Development, Planning, Public Works	\$15,000,000 (road elevation) + Bridge (\$TBD)	EDA – Disaster
I-5 Slater Interchange	WA, Whatcom County, Port of Bellingham, Ferndale, Lummi	Construct on/off ramp roundabouts along I-5 at exit 260 where they intersect Slater Road. Traffic studies show the surrounding interchange will experience more traffic due to rapid growth in the area within the next decade.	WSDOT Lummi	\$21.1 million	WSDOT Connecting Washington Transportation Package
Chief Martin Road	Lummi	Infrastructure updates to electricity, water, sewer and paving estimate	Planning Public Works	\$4,204,985	EDA ARPA Build Back Better
Roundabout at Kwina, Lummi Shore Rd, and Marine Dr.	Lummi	Construction of a roundabout to replace 4 minor stop controlled intersections which have 8 deficient left turn movements.	Planning Public Works	\$5,200,000	U.S. Federal Highway Admin STBG \$4,500,000 + 31% Match
Lummi Shore Road Pedestrian Path – Kwina Rd to Haxton Way	Lummi	The project consists of construction of 5070 linear feet of pedestrian improvements along the south/west side of Lummi Shore Drive, constructed within the roadway easement between Kwina Road and Haxton Way and includes replaces ditches with storm sewer conveyance system, road widening and illumination. The purpose of the proposed pedestrian path is to address safety concerns and to provide safe pedestrian access to Haxton Way from the vicinity of the Northwest Indian College and tribal facilities on Kwina Road. The current roadway	Planning Public Works	\$2,700,000	

		has a limited shoulder width and pedestrians have no separation from vehicular traffic. Vehicles often travel at a high speed along this section of roadway. Visibility is especially difficult at night due to a lack of street lighting and rural conditions.			
<u>Broadband:</u>					
Broadband/Telecommunications	Lummi	Construction, improvement of facilities and equipment needed to provide high-speed internet to residents of the Lummi Nation. Our proposed fiber-to-the-home (FTTH) project will place 31.25 miles of backbone fiber and 24.96 miles of distribution fiber for a total of 56.21 miles of fiber that will serve 2,359 homes, anchor institutions and businesses throughout the reservation.	Economic Development, Planning, IT, Public Works, Education Health	\$17,390,000	NTIA TBC Program - Broadband Infrastructure Deployment Grant
Broadband/Telecommunications	Lummi	The Lummi Reservation is 2500 square miles and a variety of diverse terrain and demographics. The grant would formulate a plan that improves telemedicine capacity on the reservation to maintain physical and mental healthcare services; greater retention and creation of tribal teachers by accelerating learning and degree attainment in high school; and to accommodate culturally relevant and tribe-specific needs as well as maintain school courses during COVID19 pandemic.	Economic Development, Planning, IT, Public Works, Education Health	\$809,734	NTIA TBC Program – Broadband Use and Adoption Grant
Broadband – Lummi Networks Building	Lummi	The Lummi Networks telecommunications project involves the installation or construction of a new structure of a wireless telecom facility.	Economic Development, Planning, IT, Public Works	TBD	TBD
Wayfinding Signage	Lummi	Establish a coordinated system of wayfinding signs for the purpose of guiding visitors, residents and businesses to their destinations (and other points of interest) within the Lummi reservation and the surrounding area. Coordinated wayfinding systems enable jurisdictions to improve traffic circulation, create a sense of place, improve the characterization of sub-areas and districts within a community, and	Economic Development, Planning, Public Works	\$50,000	Local funds, REET, EDI

		reduce sign blight. As proposed, the Tribe would establish a series of signs throughout the reservation that will provide directions to points of interest within the reservation. As part of this program a variety of existing signs would be removed and consolidated into the proposed wayfinding program. The Lummi Nation expects to coordinate with Ferndale, Lummi Island, Whatcom County, private businesses and the general public to identify important destinations within the Ferndale area and to development variations from the central theme of the wayfinding program.			
Solid Waste Management • Refuse Site Sanitation and Recycling	Lummi	In 2002 the Solid Waste Management Project was created to address illegal solid waste dumping on the Lummi Indian Reservation. The LIBC initially fully funded this effort until U.S. EPA funding was obtained to help support the effort. As a result a total of 565 tons of solid waste, nearly 215 appliances, nearly 500 tires, and over 70 abandoned vehicles have been removed and disposed of at an off-reservation licensed transfer station. Since then, the project went to the wayside and it is the desire of LIBC to reimplement the program. There are approximately 1966 households that could be served, plus government facilities.		\$130,000 equipment	
Propane	Lummi	Since the majority of Tribal homes are heat sourced by propane, it is the desire of the LIBC to provide propane services to Tribal residents.			
Chief Martin Road – Engineering, Utilities and Paving	Lummi	Electricity, Water, Sewer and Paving Estimate	Planning	\$4,204,985.00	

Enterprise Investments					
<u>Business Cluster: Salish Village</u>					
Phase 2: I-5 Development West – 5 Outpads	Lummi	Engineering, Construction drawings – grading, drainage, underground utilities, pads, parking, stormwater	Tim Ballew, LCC	\$1,715,000	EDA ARPA Build Back Better
Phase 3: I-5 Development East	Lummi	Wetlands Delineation, mitigation plan, biological assessment, stormwater, permitting, retention pond, construction drawings – grading, drainage, underground utilities, pads, parking, stormwater, site work	Tim Ballew, LCC	\$3,285,000	EDA ARPA Build Back Better
I-5 Utilities – Water & Sewer	Lummi	Feasibility Study done? Pipe it in from our LTSWD lines to the corner of I-5. Water line extension.	Planning LTSWD LCC	\$7,000,000	EDA ARPA Build Back Better
Marijuana Store	Lummi	Modifications to the site previously occupied by the 260 Tobacco and Fine Spirits.	Economic Development	\$2,000,000	TBD
<u>Business Cluster: Gooseberry Point</u>					
Gooseberry Point Commercial Site Plan – the Working Waterfront	Lummi	Marina and working waterfront			EDA ARPA Build Back Better
<u>Business Cluster: Legoe Bay</u>					
Legoe Bay Property Plan	Lummi Island	Legoe Bay on Lummi Island was the original site of the Lummi School of Aquaculture. Replacing the former dock at Legoe Bay is the necessary first step in revitalizing the site.			EDA ARPA Build Back Better
<u>Business Cluster: Kwina Corridor</u>					
Technology Training Center	Lummi	A digital equity program for seniors, unemployed residents, those experiencing homelessness, residents who face barriers to accessing digital services during this period when there is an increased reliance on the internet to access public services and economic relief resources available in response to and recovery from the COVID19 pandemic.	Economic Development, Workforce Program	\$8,000,000	EDA
Garipee Commons					

NWIC Health & Wellness Center					
Roundabout at Kwina, Lummi Shore Rd, and Marine Dr.	Lummi	Construction of a Roundabout to replace 4 minor stop controlled intersections which have 8 deficient left turn movements	Planning Public Works		
Lummi Tribal Health Center	Lummi	A new medical clinic for the Lummi community is of the highest priority to support the expansion of health care services for the growing population.	Tim Ellis	\$38,500,000	USDA Loan
Swimming Pool	Lummi	25 yd x 50 yd	Planning Public Works Econ Dev	\$2,900,000	EDA ARPA Travel, Tourism & Outdoor Recreation
Transit Facility	Lummi	Transit Parking Lot Design and Bus Barn	Planning Public Works	\$2,300,000	TBD
Lummi Shore Road Pedestrian Path	Lummi	The project consists of construction of 5070 linear feet of pedestrian improvements along the south/west side of Lummi Shore Drive, constructed within the roadway easement between Kwina Road and Haxton Way and includes replaces ditches with storm sewer conveyance system, road widening and illumination. The purpose of the proposed pedestrian path is to address safety concerns and to provide safe pedestrian access to Haxton Way from the vicinity of the Northwest Indian College and tribal facilities on Kwina Road. The current roadway has a limited shoulder width and pedestrians have no separation from vehicular traffic. Vehicles often travel at a high speed along this section of roadway. Visibility is especially difficult at night due to a lack of street lighting and rural conditions.	Planning Public Works	\$2,700,000	TBD
<u>Business Cluster: Haxton Way</u>					
Silver Reef Casino		Modifications to service due to COVID-19 – including food and beverage, Reef Rewards Program mobile app, and eventually sports wagering			

Misc Developments					
Residential Housing Plan	Lummi	Proposed activities of the Lummi Housing Authority, see 2021 Housing Plan	Lummi Housing Authority	\$5,658,870	NAHASDA IHBG, LIBC, Grants, Program
Housing Assistance	Lummi				
Elder Housing	Lummi				
Hospice Home	Lummi	Renovation of the Boynton House at Point Francis		\$1,000,000	TBD
Women's Home for CARE	Lummi				
Alternative Living	Lummi	Sexual Offenders, Safe community			Dept of Corrections
Lummi B&G Club – Addition of 2 gyms	Lummi	Swimming pool?		Albert Toby may know a source	
Shaker Church	Lummi				
Multi-Purpose Community Bldg Scott Rd/Lummi Shore	Lummi				
Stepping Stones/Tiny House Village	Lummi – Eagle Haven site	Lummi Stepping Stones, a tribal non-profit, will manage and operate a tiny house village at the Eagle Haven property. The cottage style homes will be for those individuals experiencing homelessness.	Stepping Stones, Lhaqtemish Foundation, Opportunity Council	\$6,300,000	WA Dept of Commerce State Housing Trust Fund Cottage Communities, LIBC, Misc
Homelessness	Lummi				
Loomis Trail	Lummi	Modifications to service due to COVID-19 – including food and beverage, Reef Rewards Program mobile app, and eventually sports wagering			
Business Park – manufacturing, etc	Lummi				
Foreign Trade Zone #128	Lummi				
Lummi Networks	Lummi				
Museum	Lummi				
Correctional Facility	Lummi	Need a study for the correctional facility – it's been 10 years since we've looked at this project.			
Stommish Facility Upgrades	Lummi	-Maintenance, Repair and upgrades -construction of a lighted basketball court and playground		\$200,000 for playground	
Commodity Foods	Lummi	New Facility – including a dining space for large gatherings and a permanent Port-cochere, west parking lot expansion and paving.			

Tribal Car Fleet	Lummi	Replace GSA vehicles with leasing agreement with Enterprise Rental Car	Planning	TBD	
Little Bear Creek	Lummi	Facility is currently in need of upgrades/replacements for 2 elevators at \$200K each	Lummi Housing Authority Planning	\$400,000	TBD

APPENDIX C – Lummi Nation’s Economic Recovery & Resiliency Plan



Lummi Indian Business Council
Economic Recovery and Resiliency Plan
Addendum to the
Comprehensive Economic Development Strategy
2021

Prepared by Sean Lawrence, Director, Office of Economic Policy [Click or tap to enter a date.](#)

"We are Lummi. We are Coast Salish people with a rich history, culture and traditions. We are fishers, 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."

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Executive Summary

Summary Background

On March 3, 2020, the Lummi Nation had declared a Public Health Emergency (PHE) for 2019 Novel Coronavirus (2019-nCoV) under the Lummi Codes of Law: [Title 44:Emergency Health Powers Code](#). Prior to this declaration, the United States Health and Human Services Secretary had also declared a [public health emergency](#), on January 31, 2020 pursuant to section 319 of the Public Health Service Act.

Shortly after the PHE was declared, Lummi Nation had also instituted its first shelter in place order. This shelter in place order and those that followed, drastically impacted the way Lummi does its business. This included: service delivery, public health, health care, education, employment, natural resources, food bank, development and culture. The PHE of COVID-19 had adjusted the way we look at mission fulfillment, which is to “preserve, promote, and protect our sche’lang’en.” This plan will further support this mission and actions to become more resilient in the future.

SWOT Analysis

Strengths

Are a regions competitive advantage that are often internal in nature.

Weaknesses

Are a regions competitive disadvantage that are often internal in nature.

Opportunities

Are changes or occasions for regional improvement or progress and are often external in nature.

Threats

Are changes or occasions for regional decline and are often external in nature

Strategic Direction/Action Plan

Strategic Direction

The strategic direction that is provided in this section, is the culmination of years of analysis of the Lummi Nation Economy and community involvement and input. It reflects the vision of the General Council, while also adhering to the standards set forth for an Economic Recovery and Resilience plan.

Vision Statement

The vision of the Office of Economic Policy is to increase the standard of living of Lummi Tribal Members and improving the sustainable economic health of the Lummi Nation.

Goals and Objectives

Goal #1: Responding to the economic injury as a result of the coronavirus

Objective 1.1: Provide technical assistance to small business owners

Objective 1.2: Provide technical assistance to LIBC owned businesses

Objective 1.3: Providing (access to) capital for small business owners

Objective 1.4: Providing capital for LIBC Owned businesses

Goal #2: Prevent, prepare for, and respond to coronavirus

Objective 2.1: Utilization of the Lummi Codes of Law Title 44: Emergency Health Powers Code

Objective 2.2: Follow shelter-in-place guidelines, including LIBC return to work policies and procedures

Objective 2.3: Support current and prospective workforce through career development activities

Goal #3: Prepare regional economy for next emergency

Objective 3.1: Review SWOT Analysis for gaps

Objective 3.2: Seek business opportunities for small businesses and LIBC owned businesses

Objective 3.3: Ensure a consistent business environment for small and LIBC owned businesses

Objective 3.4: Garner legal and administrative support for enforcement of current and future tax liabilities

Goal #4: Ensure adequate resources for infrastructure to support the community

Objective 4.1: Support broadband connectivity for all on the Lummi Reservation

Objective 4.2: Support sewer and water developments for enrolled Lummi Tribal Members living on the Lummi Reservation

Objective 4.3: Improve the region's transportation system

Objective 4.4:

Action Plan

The action plan that supports this work will include:

- Supporting entrepreneurs on adjustments needed for COVID-19 (Objective 1.1)
- Working with LIBC Owned enterprises to revise revenue projections (Objective 1.2)
- Providing small business interruption grants to enrolled Lummi Member businesses (Objective 1.3)
- Ensuring LIBC owned businesses having operating capital or improvements needed to respond to COVID-19 (Objective 1.4)
- Adhere to the guidelines provided by Lummi Executive Medical Director and Public Health (Objective 2.1 and 2.2)
- LIBC administering the Education and Retraining Grant (Objective 2.3)
- Supporting Workforce Development Department on analyzing the job market potential for the community (Objective 2.3)
- Provide strategic recommendations in writing (Objective 3.1)
- Analyze the feasibility of business proposals (internal and unsolicited) (Objective 3.2)
- Review of codes for consistency, and address areas that need improvement or implementation to ensure a consistent business environment (Objective 3.3)
- Implementation of a revenue office and teams members for enforcement of current and prospective taxes on business activities (Objective 3.4)
- Deploying a rapid response for broadband (Objective 4.1)
- Strategizing a long-term solution to the lack of broadband access on the reservation (Objective 4.1)
- Support land use and building permits for enrolled Lummi Tribal members (Objective 4.2)
- Provide updated forecasts of enrolled Lummi Population estimates (Objective 4.3)

Evaluation Framework

Economic Resilience

Planning for and Implementing Resilience

Establishing Information Networks

Pre-Disaster Recovery Planning

Measuring Resilience

Conclusion