



State of Washington

## Department of Fish and Wildlife, Region 4

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

October 31, 2024

City of Lake Forest Park  
Mark Hofman, Community Development Director  
17425 Ballinger Way NE  
Lake Forest Park, WA  
Mhofman@cityofflp.gov

### **RE: Submittal ID: 2024-S-7592, WDFW comments for Lake Forest Park’s draft Comprehensive Plan elements**

Dear Mr. Hofman,

On behalf of the Washington Department of Fish and Wildlife (WDFW), thank you for the opportunity to comment on Lake Forest Park’s draft Comprehensive Plan as part of the current periodic update. Within the State of Washington’s land use decision-making framework, WDFW is considered a technical advisor for the habitat needs of fish and wildlife and routinely provides input into the implications of land use decisions. We provide these comments and recommendations in keeping with our legislative mandate to preserve, protect, and perpetuate fish and wildlife and their habitats for the benefit of future generations – a mission we can only accomplish in partnership with local jurisdictions.

**Table 1. Recommended changes to proposed policy language.**

Policy Number	Policy Language (with WDFW suggestions in red)	WDFW Comment
<b>Land Use Element</b>		
Policy LU–1.3 Page 18	Maintain a Comprehensive Plan Land Use Map that designates the future distribution, extent, and location of the generalized land uses described above (see Figure I-1, Comprehensive Plan Land Use Map).	We encourage the city to incorporate sensitive or critical areas within this map in order to clearly depict less suitable areas for development. Mapping resources of these areas can be found at the <a href="#">WDFW website</a> . We also encourage the city to identify the location of non-fish passable culverts within city maps in order to coordinate efforts to correct these fish barriers. See the location of fish passage barriers via WDFW <a href="#">mapping resource</a> . See also NOAA’s grant opportunity that addresses this,

		<a href="#">Restoring Fish Passage through Barrier Removal Grants.</a>
Policy LU–2.2 Page 19	Encourage a high-quality pedestrian environment that is barrier-free for nonmotorized travel and that connects residential neighborhoods to businesses, services, and local and regional transit options. <i>The Legacy 100-Year Vision identifies several possible gateway locations, as well as integrated corridors and greenways.</i>	We highly encourage potential multi-benefit corridors to be displayed on maps to support future planning efforts. Integrating wildlife habitat corridors with pedestrian trail linkages will create connected pathways that benefit both ecological health and community access, providing seamless movement for wildlife and recreational opportunities for residents. Planning for wildlife movement also helps address wildlife-vehicle collision concerns. For resources, see <a href="#">The Washington Wildlife Habitat Connectivity Working Group</a> , WSDOT’s <a href="#">Reducing the risk of wildlife collisions website</a> as well as <a href="#">Wildlife Habitat Connectivity Consideration in Fish Barrier Removal Projects</a> , Montana Fish, Wildlife, and Parks’ <a href="#">How to Build Fence with Wildlife in Mind</a> , and WDFW’s <a href="#">website</a> .
Policy LU–3.1 Page 21	Encourage the integration and expansion of natural landscapes in new land and roadway developments by including both native and compatible, non-invasive, non-native plants, shrubs, and trees. <b>Require site plans for new development to show how new open spaces connect with existing adjacent open spaces.</b>	We strongly encourage the city to prioritize the strategic placement and retention of natural open spaces to support both ecological integrity and recreational opportunities. Regulations should emphasize the importance of positioning these spaces to promote connectivity for both recreational uses and habitat corridors. Site plans should clearly demonstrate this intent to the greatest extent feasible. Please see the Puget Sound Regional Council’s <a href="#">Regional Open Space Conservation Plan</a> for resources.
Policy LU–3.3 Page 21	Recognize tree canopy conservation and expansion as a vital city resource that supports healthy communities for all residents, particularly in areas of the city that lack or are at risk of losing trees. <b>Prioritize the implementation of an annual urban tree canopy management plan to track goals and benchmark progress within the city.</b>	We encourage the city to take the baseline information from the Lake Forest Park <a href="#">i-Tree Ecosystem Analysis</a> and formulate an urban tree canopy management plan (updated annually if possible) to assess trends, set goals, and measure progress toward those goals year-to-year. This plan should also measure how well the city’s tree-related ordinances are functioning in retaining trees on the landscape. <b>It may not be enough to rely on ordinances if there is not a system in place to track cumulative impacts over time.</b> Resources: <ul style="list-style-type: none"> <li>• <a href="#">City of Tacoma</a> is a great resource for exploring how tree canopy plans can become a community effort, how data can be presented, and how to track canopy loss/gain.</li> </ul>

		<ul style="list-style-type: none"> <li>• Data resources include the <a href="#">USDA website</a>, WDFW’s <a href="#">change detection tree canopy data</a>, the Puget Sound Washington <a href="#">Urban Canopy Project</a>, and the WA <a href="#">DNR website</a>.</li> <li>• Example ordinances and plans can be found on the <a href="#">MRSC website</a>.</li> <li>• Funding resources can be found on the DNR website (<a href="#">Commissioner Franz Announces \$8 Million in Urban Forestry Grants</a>).</li> <li>• Discover the value of the benefits provided by individual trees around your home and in your community with the <a href="#">National Tree Benefit Calculator</a>.</li> <li>• See also the city of Everett’s <a href="#">Tree Keeper</a> website.</li> <li>• See also WDFW’s <a href="#">Habitat at Home</a> program, which encourages the protection of wildlife through purposeful vegetation planning.</li> </ul>
Policy LU–3.5 Page 21	Always consider implications of land use decisions on stormwater patterns and <del>support</del> <b>incentivize</b> low-impact development measures.	We encourage the city to participate in the effort to address environmentally sustainable development by utilizing incentives for LID. Resources include <a href="#">Olympia Rain Garden Incentive Program</a> , <a href="#">Puget Sound Green Stormwater Infrastructure Incentives Programs</a> , <a href="#">Green Stormwater Infrastructure Assistance Programs Guidebook</a> , and the <a href="#">Rain Garden Handbook for Western Washington</a> .
Policy LU–3.6 Page 21	Support <b>and incentivize</b> the natural drainage and green infrastructure concepts and projects identified in the Legacy 100-Year Vision.	See comment above as well as Shoreline’s <a href="#">deep green incentive program</a> which outlines how green development can participate in expedited review as well as fee waivers and/or reductions. The Sustainable Development Code <a href="#">website</a> is also a great resource in outlining how to remove code barriers, create incentives, and fill regulatory gaps in pursuit of this policy’s goals. See also the <a href="#">city of Issaquah</a> and <a href="#">Bellevue’s</a> clean building incentive programs that aim to assist applicants in reaching energy efficiency standards.
Policy LU–3.7 Page 21	Recognize and support tree preservation as an integral part of community character. <b>Collaborate with developers to assess the true costs of mitigation planting versus</b>	This addition strengthens the adjacent policy by emphasizing the economic and environmental benefits of preserving existing vegetation over mitigation planting. Established trees provide immediate ecosystem services—such as

	preserving existing vegetation, emphasizing the long-term environmental and economic benefits of retaining mature trees.	stormwater retention, cooling of buildings, and aesthetics—that are costly to replicate with new plantings, which take years to mature and require substantial maintenance. By collaborating with developers to retain mature vegetation, the city can reduce mitigation costs, improve urban resilience, and maintain community character, supporting sustainable growth while safeguarding natural assets.
Policy LU–5.6 Page 23	Inventory and encourage the redevelopment of underutilized commercial areas through regulatory techniques and incentives.	See the resources below: <ul style="list-style-type: none"> <li>• <a href="#">Whatcom County open space tax incentive program</a></li> <li>• <a href="#">King County’s Public Benefit Rating System Program (tax incentive program)</a></li> <li>• <a href="#">Snohomish County TDR Program</a></li> <li>• <a href="#">Issaquah TDR Program (map)</a></li> <li>• <a href="#">Redmond TDR Program</a></li> <li>• <a href="#">Redmond Open Space Preservation</a></li> <li>• <a href="#">Seattle Green Spaces and TDR</a></li> </ul>
Policy LU–6.3 Page 24	Enhance the public right-of-way as a character-defining element of the community, by promoting pedestrian safety, wildlife safety, Safe Streets elements, and streetscape improvements—such as wayfinding signs, lighting, public art, enhanced landscaping, and street furniture.	As stated in comments associated with Policy LU–2.2 above, planning for safe wildlife movement, such as replacing culverts with wider bridges for animals to cross underneath, supports citizen safety and wildlife health.
Policy LU–7.7 Page 25	Support the expansion of the City’s green resources to promote safer pedestrian, wildlife, and bicycle access movement along high-velocity traffic corridors.	See comment above and comments for Policy LU–2.2.
Policy LU–11.3 Page 26	Support developments that utilize clean energy or reduced energy consumption. Incentivize development that incorporates natural features to maintain ecosystem services.	See comments associated with Policy LU–3.5 and LU–3.6 above.  Protecting and restoring natural assets is often more cost-effective than engineered solutions. See FEMA’s guide <a href="#">Building Community Resilience with Nature-based Solutions</a> , as well as software to track these resources from <a href="#">Natural Capital Project</a> . Furthermore, see Kitsap County’s approach to quantifying ecosystem services through their

		<a href="#">Kitsap Natural Resource Asset Management Project.</a>
<b>Environmental Quality and Shorelines Element</b>		
Policy EQ–1.1 Page 29	Conserve designated sensitive areas, including ravines, steep slopes, wetlands, riparian zones, and other features.	In order to actively conserve riparian zones, we strongly recommend Lake Forest Park utilize <a href="#">WDFW’s best available science</a> (BAS) and <a href="#">management recommendations</a> related to riparian ecosystems. Protecting all streams regardless of fish presence, employing riparian management zones (RMZs) to replace outdated ‘stream buffer’ terminology, and utilizing site-specific characteristics to determine RMZ widths (Site Potential Tree Height at 200 years, or SPTH <sub>200</sub> ) are all integral components of ensuring no net loss of ecosystem values or functions occur. See RMZ widths via WDFW’s <a href="#">mapping resource</a> .  See also the Department of Ecology’s <a href="#">Climate Resilient Riparian Systems Grant</a> .
Goal EQ–2 Page 29	Suggested Policy for Shoreline Development:  <b>Prioritize the use of softer, bioengineered streambank stabilization methods—such as native vegetation plantings and large woody debris—over hard armoring. In addition, the city shall pursue the acquisition of areas where salmonids seek refuge along the shoreline of Lake Washington.</b>	It is exceedingly important to utilize tools, such as acquisition, to accomplish this policy’s goals. Specific to Lake Forest Park is the importance of shoreline habitat for salmonid survival. The <a href="#">Lake Washington/Cedar/Sammamish Watershed (WRIA 8) Chinook Salmon Conservation Plan 10-year Update</a> states that “good lake shoreline habitat is generally lacking.” This report goes on to point out, “Earlier studies indicated that approximately 75 percent of Lake Washington’s shoreline has a bulkhead or other form of shoreline armoring (Toft et al., 2003). These conditions have altered or eliminated much of the shallow-water habitat around the lake, reduced emergent and riparian vegetation, reduced the amount of large wood, and changed sediment dynamics.” This suggested policy also aligns with the <a href="#">interlocal agreement signed by Lake Forest Park</a> and GMA requirements, such as “counties and cities shall give special consideration to conservation or protection measures necessary to preserve or enhance anadromous fisheries,” ( <a href="#">RCW 36.70A.172</a> ).
Goal EQ–2 Page 29	Suggested Policy for Shoreline Development:  <b>Minimize overhead lighting that would shine on the water surface</b>	WDFW recommends adding the following language to expand on the proposed low-intensity lighting policy to infrastructure near watercourses. Shielded, low intensity lighting near lakes and

	of Lake Washington or the city’s various streams. Encourage the use of low-level or shaded lighting when providing lighting along waterbodies.	streams helps prevent unnatural lighting. Artificial nighttime lighting alters juvenile salmonid behavior, increasing their susceptibility to predation.
Goal EQ–2 Page 29	Suggested Policy:  New developments located near water bodies or generating runoff flowing into waterways must implement low impact development techniques as a requirement.	In addition to the resources above, utilizing LID techniques can help the city address <a href="#">Federal Policy Priorities</a> , such as, “Chemicals from decaying tires, specifically 6PPD-quinone affect coho, Chinook, sockeye and steelhead. In particular, coho have been shown to be most sensitive and succumb to “urban runoff mortality syndrome” within hours of exposure. Federal funding is needed to support local governments in implementing critical stormwater retrofit projects to capture and treat toxic runoff.”  Resources for LID include King County’s <a href="#">Regional Stormwater Action Goals</a> (which includes <a href="#">Planning Stormwater Parks</a> ), the Sustainable Development Code <a href="#">website</a> and the <a href="#">VISION 2050 Planning Resources Guidance on Integrating Stormwater Solutions into Comprehensive Plans</a> .
Policy EQ-3.7 Page 31	Encourage, <b>prioritize and incentivize</b> low-impact development alternatives and appropriate enhancements of the street maintenance program to minimize urban runoff.	We encourage the city to participate in the effort to address environmentally sustainable development by utilizing incentives for LID. Resources include <a href="#">Olympia Rain Garden Incentive Program</a> , <a href="#">Puget Sound Green Stormwater Infrastructure Incentives Programs</a> , <a href="#">Green Stormwater Infrastructure Assistance Programs Guidebook</a> , and the <a href="#">Rain Garden Handbook for Western Washington</a> .
Policy EQ-3.10 Page 32	Support the removal or retrofit of existing culverts and encourage daylighting of creeks wherever possible to restore natural waterways <b>and facilitate multi-benefit outcomes for climate resilience, as well as pedestrian and wildlife corridor linkages.</b>	As mentioned above, we encourage the city to incorporate multi-benefit solutions into the framework of culvert retrofits, such as wider underpasses to facilitate pedestrian and wildlife movement. See <a href="#">Wildlife Habitat Connectivity Consideration in Fish Barrier Removal Projects</a> as well as <a href="#">WDFW’s climate-change-resilient culvert</a> webpage and <a href="#">Incorporating Climate Change into the Design of Water Crossing Structures: Final Project Report</a> (2017) for resources on how to incorporate climate-resiliency into culvert designs.

		See also the location of fish passage barriers via WDFW's <a href="#">mapping resource</a> .
Policy EQ-7.4 Page 34	Encourage the maintenance of native plantings in sensitive area buffers for wildlife when development occurs and encourage improvement to contiguous wildlife corridors whenever possible. <b>Require development plans to include and visually demonstrate corridor connections on site plans.</b>	See comments above for LU-2.2, LU-3.1, LU-6.3, and LU-7.7.
Policy EQ-7.6 Page 34	Increase fish habitat restoration efforts along the city's stream systems and along the lakeshore <b>by incentivizing property owners to participate in restoration efforts, prioritizing the replanting of native vegetation, erosion control measures, and in-stream habitat structures. The city shall also utilize land acquisition and Transfer of Development Rights or similar programs for critical habitat areas.</b>	See resources in comments above, as well as WDFW's <a href="#">Habitat at Home</a> program.
Policy EQ-8.1 Page 35	Maintain or exceed the minimum citywide canopy cover goals established by the Lake Forest Park Municipal Code through regular evaluation and refinement of the City's land use and environmental regulations and policies. The Community Forest Management Plan is available online at <a href="http://www.cityoflfp.gov/DocumentCenter/View/6175">www.cityoflfp.gov/DocumentCenter/View/6175</a> .	As stated above in comments for LU-3.4, we highly recommend releasing a more regular report to evaluate if goals are being met. The Community Forest Management Plan mentioned within this policy is 14 years old.
Policy EQ-8.6 Page 35	Require all new private and public site developments <b>to prioritize native vegetation retention. If total retention is infeasible, require developments to include a tree-replacement plan that achieves or enhances canopy coverage goals.</b>	As stated in comments associated with LU-3.7 and LU-11.3, retention should take priority over vegetation replacement.

<p>Policy EQ-8.7 Page 35</p>	<p>Develop a vigorous program to control invasive plant species such as blackberry, English ivy, cherry laurel, and English holly on public property and encourage their control on private property.</p>	<p>We recommend that invasive and noxious plant removal methods be designed to minimize impacts on fish, wildlife, and habitats. This includes using techniques like hand weeding with light equipment, applying only Ecology-approved aquatic herbicides and adjuvants, avoiding hazardous substances, and preventing soil compaction.</p>
<p><b>Housing Element</b></p>		
<p>Policy H-1.5 Page 40</p>	<p>Promote infill development of compact middle housing types as a means of meeting a more diverse range of housing needs while protecting environmentally sensitive areas.</p>	<p>See the resources below:</p> <ul style="list-style-type: none"> <li>• <a href="#">Whatcom County open space tax incentive program</a></li> <li>• <a href="#">King County’s Public Benefit Rating System Program (tax incentive program)</a></li> <li>• <a href="#">Snohomish County TDR Program</a></li> <li>• <a href="#">Issaquah TDR Program (map)</a></li> <li>• <a href="#">Redmond TDR Program</a></li> <li>• <a href="#">Redmond Open Space Preservation</a></li> <li>• <a href="#">Seattle Green Spaces and TDR</a></li> </ul>
<p>Policy H-2.2 Page 41</p>	<p>Promote residential neighborhoods that protect and promote quality outdoor spaces and contribute to an equitable distribution of a <b>connected network of</b> parks and open space throughout the city <b>and regionally</b>.</p>	<p>See comments related to LU-2.2, LU-3.1, LU-6.3, and LU-7.7.</p>
<p><b>Capital Facilities Element</b></p>		
<p>Policy CF-4.8 Page 63</p>	<p>Promote the location of capital facilities to enhance efficient use of land, reduce public costs, reduce travel demand, and minimize disruption to the community. <b>The city shall also consider siting public facilities with climate-related hazards in mind, such as flooding, sea-level rise, and extreme weather, to enhance community resilience and reduce future risks.</b></p>	<p>Given that public facilities represent significant public investments, it is prudent to ensure that facilities are designed and sited to be resilient to climate impacts. Local governments should review their Capital Facilities Plans in the context of climate change projections to ensure that planned facilities will be resilient throughout their intended lifespan and make changes as needed. See <a href="#">Climate Mapping for a Resilient Washington</a>, as well as FEMA’s <a href="#">Resilience Analysis and Planning Tool (RAPT)</a> to visualize these hazard areas.</p>
<p><b>Parks Trails and Open Space Element</b></p>		



Goal PT-2: Trails Page 68	Promote a safe, interconnected system of trails throughout the city, that serve important recreational and transportation roles for regional and local bicycle and pedestrian trail systems. <b>Special consideration shall also be given to enhance wildlife habitat corridor linkages.</b>	See comments related to LU-2.2, LU-3.1, LU-6.3, and LU-7.7.
Goal PT-4: Environmental Protection Page 69	Suggested Policy: <b>Review parks and grounds maintenance procedures and adopt written Best Management Practices that protect streams and riparian areas.</b>	Because of Lake Forest Park’s unique geographic location, a significant number of municipal activities possess the potential to impact waterways supporting salmon populations. It is advised that this consideration be duly incorporated into the policy development process across this Comprehensive Plan.
<b>Utilities Element</b>		
Goal U-4: Environmental Impacts Page 77	Suggested Policy: <b>The city shall create a prioritization list and plans for at-risk overflow infrastructure. Additionally, the siting of new sewer infrastructure within flood-prone areas is prohibited.</b>	If not done so already, we highly encourage the city to prioritize actions to address at-risk infrastructure as soon as possible, with emphasis on areas that pose community and environmental health risks.
Policy U-5.1 Page 78	When expanding or upgrading utilities, consider environmental justice criteria <b>as well as future climate-related impacts</b> in making decisions.	It is important to plan for utility infrastructure that will be resistant to future flooding and additional climate-related conditions.
<b>Transportation Element</b>		
Policy T-1.8 Page 83	In partnership with the State and other agencies, develop corridor plans for SR 522 and SR 104 that holistically address all modes of transportation, adjacent land uses, utility undergrounding, <b>fish and wildlife movement</b> , and the connecting street network.	See comments related to LU-2.2, LU-3.1, LU-6.3, and LU-7.7.
Policy T-1.11 Page 83	Review and update roadway and sidewalk standards to ensure they meet multimodal transportation needs <b>and encourage wider</b>	See comment above.

	underpasses for wildlife corridor needs.	
Policy T-2.1 Page 85	Implement and regularly update the Safe Streets, Safe Highways, and Safe Streets Town Center Connections Plans that identifies:	We highly encourage these plans to incorporate a prioritization list for high wildlife-related collision areas to be modified/corrected. See comments above.
Policy T-2.2 Page 85	In conjunction with WSDOT and other regional authorities, consider pedestrian/wildlife overpass/underpass crossings for major transportation corridors to improve access and safety.	See resources in comments noted above, particularly WSDOT's <a href="#">Reducing the risk of wildlife collisions website</a> as well as <a href="#">Wildlife Habitat Connectivity Consideration in Fish Barrier Removal Projects</a> .
Goal T-7 Page 90	Suggested Policy:  Integrate low impact development into all transportation projects to support regional salmon recovery efforts by improving water quality and reducing pollutants like 6PPD-quinone, a toxic chemical from tire wear.	This policy is crucial for Lake Forest Park, given its extensive Lake Washington shoreline, as roadway runoff significantly degrades water quality and threatens local salmon populations. Chemicals like 6PPD-quinone, commonly found in tire wear, are highly toxic to salmon, and runoff from transportation infrastructure can quickly carry these pollutants into waterways. By prioritizing LID techniques, the city can effectively filter and reduce harmful runoff, directly supporting salmon recovery efforts and enhancing overall water quality.

Additionally, we suggest utilizing the [Sound Choices Checklist](#) in further review of all Comprehensive Plan elements. This checklist utilized broad priorities that are applicable to all jurisdictions.

Thank you for taking the time to consider our recommendations to better reflect the best available science for fish and wildlife habitats and ecosystems. We value the relationship we have with your jurisdiction and the opportunity to work collaboratively with you throughout this periodic update cycle. If you have any questions or need our technical assistance or resources at any time during this process, please don't hesitate to contact me or the Regional Land Use Lead, Morgan Krueger (morgan.krueger@dfw.wa.gov).

Sincerely,



Timothy Stapleton  
Washington Department of Fish and Wildlife

## Region 4, Habitat Program Manager

CC:

Morgan Krueger, Regional Land Use Lead (Morgan.Krueger@dfw.wa.gov)

Kara Whittaker, Land Use Conservation and Policy Section Manager (Kara.Whittaker@dfw.wa.gov)

Marian Berejikian, Land Use Conservation and Policy Planner (Marian.Berejikian@dfw.wa.gov)

Stewart Reinbold, Assistant Regional Habitat Program Manager (Stewart.Reinbold@dfw.wa.gov)

Jesse Dykstra, Habitat Biologist (Jesse.Dykstra@dfw.wa.gov)

Region 4 Southern District inbox (R4SPlanning@dfw.wa.gov)

Jeff Aken, WA Department of Commerce (Jeff.Aken@commerce.wa.gov)