

Exhibit 1



State of Washington

Department of Fish and Wildlife, Region 4

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Mr. Jonathan Kesler, Planning Manager
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RE: WDFW’s comments in relation to the draft elements of Medina’s Comprehensive Plan

Dear Mr. Kesler,

On behalf of the Washington Department of Fish and Wildlife (WDFW), thank you for the opportunity to submit our comments on the proposed draft policy language of Medina’s Comprehensive Plan as part of the current periodic update. Within the State of Washington’s land use decision-making framework, WDFW’s role is that of technical advisor with respect to the habitat needs of fish and wildlife and the likely implications of various land use decisions on those resources over time. 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
Land Use		
LU-P7 Page 9	The City should work with WSDOT and City residents to develop mitigation measures that it seeks to be implemented as part of regional facilities development or improvement projects, such as SR 520 and related structures and improvements, and are designed to promote and improve physical, environmental , mental, and social health and reduce the impacts of climate change and fish passage	We suggest the inclusion of environmental health and fish passage within this policy. For example, it is important to plan and prioritize culvert upgrades to ensure not only fish passage benefits, but adequate projected stormwater passage, as well as wildlife habitat corridor and pedestrian trail linkages. We suggest this element (and future amendments to the City of Medina’s Capital Improvement Plan) include this goal, targeting areas where terrestrial species and pedestrian connectivity can be restored simultaneously (i.e., replacing culverts with wide bridges and

	<p>barriers on the natural and built environments. Coordination between the City, King County, and WSDOT should reflect opportunities to promote or improve public health and safety of regional trail systems.</p>	<p>underpasses). Current fish passage barrier locations can be found on WDFW’s website. Further resources include WDFW’s “Incorporating Climate Change into the Design of Water Crossing Structures: Final Project Report,” as well as WSDOT’s “Wildlife Habitat Connectivity Consideration in Fish Barrier Removal Projects.” Combining stormwater maintenance (or any maintenance) with multi-benefit goals (such as climate change resiliency or salmon recovery) opens up these projects for diverse funding opportunities.</p>
<p>LU-P13 Page 10</p>	<p>The process to site proposed new or expansions to existing essential public facilities should consist of the following:</p> <ul style="list-style-type: none"> i. An analysis of current and future climate-related environmental impacts and mitigation; and 	<p>Protecting essential public facilities and the services they provide from future climate-related impacts helps ensure community resilience for the entire operational lifespan of the facility. We suggest updating zoning to allow essential or hazardous uses only in low-risk areas and assess risk when new facilities are proposed. For assessing future conditions, see Climate Mapping for a Resilient Washington, as well as FEMA’s Resilience Analysis and Planning Tool (RAPT) for resources in visualizing these hazard areas.</p>
<p>LU-P15 Page 11</p>	<p>To promote adequate stormwater management within the community, the City should consider land use development standards and other local regulations that could be revised, as appropriate, to better accommodate site drainage and encourage the practice of low-impact development. Where feasible, the City will make low impact development (LID) the preferred and most commonly used approach to site development.</p>	<p>We support the adjacent policy, and suggest Medina go even further by adding the proposed language in order to make this policy more actionable. Policies that support salmon recovery within this Comprehensive Plan are crucial. Medina’s shorelines are considered tier 1 critical areas for protection and conservation as it relates to Endangered chinook salmon recovery (Lake Washington/Cedar/Sammamish Watershed (WRIA 8) Chinook Salmon Conservation Plan). This tier 1 status underscores the unique geographic location and distinctive obligation (interlocal agreement) Medina has to preserve, rehabilitate, and re-establish salmon habitat. Especially in an urban setting such as Medina, LID can provide far-reaching support in attaining salmon recovery-related goals. Additionally, utilizing LID techniques can help the city address Federal Policy Priorities, 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</p>

		<p>exposure. Federal funding is needed to support local governments in implementing critical stormwater retrofit projects to capture and treat toxic runoff.”</p> <p>Resources for LID include King County’s Regional Stormwater Action Goals (which includes Planning Stormwater Parks), the Sustainable Development Code website and the VISION 2050 Planning Resources Guidance on Integrating Stormwater Solutions into Comprehensive Plans.</p>
Natural Environment		
<p>General Comment Page 1-2</p>	<p>The 2014 Critical Areas Map identifies and describes known regulated critical areas and sensitive areas within Medina (see Figure 4). These critical areas include:</p>	<p>We suggest this map illustrate the important tier 1 salmon habitat along the shoreline of Medina. A map depiction of this can be found in the Lake Washington/Cedar/Sammamish Watershed (WRIA 8) Chinook Salmon Conservation Plan.</p>
<p>NE-P1 Page 2</p>	<p>The City should maintain and update critical areas regulations as required by the GMA utilizing the best available science. Approaches and standards for defining and protecting critical areas should be coordinated with neighboring jurisdictions where such areas and impacts to critical areas cross jurisdictional boundaries.</p>	<p>We appreciate this policy and recommend Medina specifically reference WDFW best available science as it relates to the protection of riparian areas. This science synthesis can be found in Riparian Ecosystems, Volume 1: Science Synthesis and Management Implications (2020), while our management recommendations can be found in Riparian Ecosystems, Volume 2: Management Recommendations.</p>
<p>NE-P2 Page 3</p>	<p>The City should shall preserve and enhance where possible the functions and values of Medina’s critical areas and natural resources in a manner consistent with best available science, and preserve and restore its native vegetation, native biodiversity, and tree canopy, especially where it protects habitat and contributes to overall ecological function. Natural resources in Medina include forests, wetlands, estuaries, riparian areas, and urban tree canopy, all of which are valuable and should be protected.</p>	<p>We suggest this policy include mention of riparian areas. Riparian areas that are able to perform all riparian functions and values are instrumental in safeguarding the health of aquatic species and habitat, bolstering climate resiliency, attenuating water, combatting drought conditions, and so much more. Riparian areas “are disproportionately important, relative to area, for aquatic species (e.g., salmon) and terrestrial wildlife,” as stated in WDFW’s Riparian Ecosystems, Volume 2: Management Recommendations and supported by WDFW’s BAS. Additionally, protecting these areas is instrumental in pursuing successful salmon recovery efforts.</p>
<p>NE-P5</p>	<p>The City should work to protect, preserve and, where possible,</p>	<p>Thank you for including the mention of WRIA 8 specific plans above in policy NE-P3. From the</p>

<p>Page 3</p>	<p>enhance water quality in Lake Washington, Medina Creek, and other streams. The City should ensure that public and private projects incorporate locally appropriate, low-impact development approaches developed using a watershed planning framework for managing stormwater, prioritizes shoreline restoration and removal of hard armoring, protecting water quality, minimizing flooding and erosion, protecting habitat, and reducing greenhouse gas emissions.</p>	<p>information provided in these plans, hard armoring should also be addressed, possibly within the adjacent policy (NE-P5). As stated in chapter 11 page 10 of the Lake Washington/Cedar/Sammamish Watershed (WRIA 8) Chinook Salmon Conservation Plan (2005), “Reduce predation to outmigrating juvenile Chinook by: reducing bank hardening, restoring overhanging riparian vegetation, replacing bulkheads and rip-rap with sandy beaches with gentle slopes, and use of mesh dock surfaces and/or community docks.” Each policy suggestion within this chapter is followed by implementation suggestions to accomplish policy goals. Chapter 13 is similar, only specifically for nearshore environments. We highly encourage Medina look at some of these policies and implementation methods to incorporate them into Comprehensive Plan language.</p>
<p>NE-P6 Page 3</p>	<p>The City should develop a mitigation incentives program and streamline permitting for projects that promotes improved water quality. Incentives should be monitored to determine effectiveness.</p>	<p>We suggest streamlined permitting for restoration and water quality related projects be a top priority for future municipal code amendments.</p>
<p>NE-P7 Page 3</p>	<p>The City should work to preserve stream corridors wide enough to maintain and enhance existing stream and habitat functions in all development proposals by designation of native growth protection areas or other appropriate mechanisms.</p>	<p>See comments related to NE-P1 above. Our best available science outlines methodologies to help achieve this policy’s goals.</p>
<p>NE-P9 Page 3</p>	<p>The City should prohibit the introduction of invasive plant species and encourage enhancement of native plant communities in natural areas, which include, but are not limited to, fish and wildlife habitat conservation areas and their buffers. The City should also encourage protection or enhancement of the urban tree canopy to provide wildlife habitat,</p>	<p>We strongly encourage the city of Medina to prioritize heat mitigation, ecosystem health, and citizen health by implementing an urban tree canopy plan. We recommend this plan assess current conditions and benchmark progress towards tree canopy goals, while annually releasing a progress report. This plan should also measure how well the City’s tree-related ordinances are functioning in retaining trees on the landscape. It may not be enough to rely on</p>

	support community resilience, mitigate urban heat, manage stormwater, conserve energy, protect and improve mental and physical health,...	ordinances if there is not a system in place to track cumulative impacts over time. Some examples of tree management plans include the City of Tacoma , the City of Snoqualmie , the City of Redmond , and the City of Renton . The Puget Sound Urban Tree Canopy and Stormwater Management Handbook provides additional guidance.
NE-P13 Page 4	The City should plan for development patterns that minimize air pollution and greenhouse gas emissions, including:	We greatly appreciate the goals outlined within this policy. Some helpful resources in accomplishing these goals include the Sustainable Development Code website , which provides specific resources for removing code barriers, creating incentives, and filling regulatory gaps in pursuit of green building goals, as well as the Georgetown Climate Center's Green Infrastructure Toolkit , which provides funding models and approaches from U.S. municipalities, including Los Angeles County's Safe Clean Water Program and Boulder, Colorado's Greenways Program. Additionally, see how the city of Boston is identifying priority blocks that could yield the greatest benefits to residents in pursuit of a "cool" roof goal. Similarly, "green" roofs covered with sedum, native flowers, and other low-maintenance vegetation help insulate buildings from solar heat and provide pollinator habitat. Such rooftops help reduce building cooling costs and heat-related illnesses and deaths. Additionally, with the help of Washington Sustainable Schools Protocol: Criteria for High-Performance Schools , additional public or private infrastructure can be modeled after this example. See the LEED rating system for further resources aimed at all building types.
Community Design		
CD-P1 Page 5	Preserve and enhance trees as a component of Medina's distinctive sylvan character.	See comments related to NE-P9 above.
CD-P3 Page 5	Create a safe, attractive, and connected pedestrian environment for all ages and abilities throughout the city. Ensure these spaces incorporate wildlife habitat corridor linkages as	It is important to additionally plan for the connection and linkage of parks, open spaces, and critical areas to provide multi-benefit options, such as recreational trail opportunities as well as wildlife habitat corridor linkages. For information on implementing wildlife habitat attributes in

	well to achieve multi-benefit solutions.	public spaces, see WDFW’s Habitat at Home resource as well as WDFW’s Landscape Planning for Washington’s Wildlife for further resources, especially “Chapter 6: Implementation through Comprehensive Plans, Development Regulations, and Incentive Programs,” page 6-1. Some additional resources include the Trust for Public Lands , the NRPA Safe Routes to Parks Action Framework (which provides professionals with a “how-to” guide to implement Safe Routes to Parks strategies), and the Sustainable Development Code website.
CD-P14 Page 6	Preserve, encourage, connect , and enhance open space as a key element of the community’s character through parks, trails, and other significant properties that provide public benefit.	Connection between these spaces is key for the purpose of recreational enjoyment and wildlife habitat corridors (see comment above).
CD-P18 Page 7	Residents should shall consult with the City and with their neighbors on both removal and replacement of trees and tree groupings to help to protect views and to prevent potential problems (e.g., removal of an important tree or planting a living fence).	Municipal tree ordinances should define the mandatory process for consulting with the City in order to remove any significant tree. We suggest should be replaced by shall to more accurately represent this process.
CD-P20 Page 7	Preserve vegetation with special consideration given to the protection of groups of trees and associated undergrowth, specimen trees, and evergreen trees. Special preservation consideration will also be given to protect trees within shoreline and riparian areas.	Trees offer tremendous benefits to salmonids and all aquatic (as well as terrestrial) species within riparian areas (see WDFW BAS in comments related to NE-P2 above).
CD-P27 Page 7	Consider creating a voluntary program to inventory the City’s trees in order to measure existing tree canopy and track canopy loss or growth.	See comments related to NE-P9 above.
Housing		
H-P2 Page 6	Maintain the informal, sylvan residential character of neighborhoods. Encourage	We greatly appreciate Medina’s commitment to tree canopy protection. As mentioned in previous comments, a tree canopy management plan would

	residential site development and redevelopment to plan for the retention or preservation of existing trees.	help accomplish this goal. A plan that uses the sequential process below is what we have commonly seen utilized by jurisdictions in similar positions as Medina: <ol style="list-style-type: none"> 1. Inventory and assess current conditions; 2. Decide on goals, actions to achieve goals, and how these actions can be implemented; 3. Track progress towards these goals annually, considering adaptive management in order to pivot if goals are not being met.
General Policy Suggestion	For all new development, require parks and open space retention, creation, and connection to promote healthy and climate-resilient communities locally and regionally.	We suggest including the adjacent policy within this element. Open spaces can act as climate-resilient assets that can serve as community spaces. All new development should retain open space for the benefit of people and the environment. Many jurisdictions achieve this through requiring set-asides for open space within all new development projects. We also recommend site plans demonstrate an effort to site open space adjacent to and connected to other open spaces for recreational and wildlife corridor connection opportunities.
Transportation and Circulation		
T-G9 Page 8	To increase pedestrian and wildlife safety and explore traffic calming techniques to improve safety of all community members using the transportation network.	Transportation planning that considers wildlife movement is crucial for the safety and betterment of people and wildlife across the landscape. We recommend considering habitat attributes, wider vegetated areas, and other methods that could tie wildlife habitat corridor linkage planning into transportation planning. For additional resources, see The Washington Wildlife Habitat Connectivity Working Group , WSDOT's Reducing the risk of wildlife collisions website as well as Wildlife Habitat Connectivity Consideration in Fish Barrier Removal Projects , Montana Fish, Wildlife, and Parks' How to Build Fence with Wildlife in Mind , and WDFW's website .
T-P3 Page 8	The City should seek to provide pedestrian and wildlife movement improvements in conjunction with stormwater drainage improvements, when desirable.	See comment above.

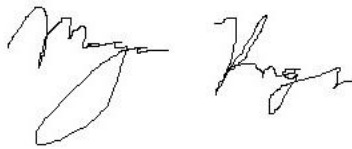
<p>T-P8 Page 9</p>	<p>The City should work with WSDOT, city residents and other groups, stakeholders, and agencies to develop mitigation measures that may be implemented as part of any SR 520 improvement/expansion project. The City should seek an overall reduction of impacts, including measures such as:</p>	<p>Wildlife movement should also be considered in this policy, as described above in comments related to T-G9.</p>
<p>General Policy Suggestion</p>	<p>Identify road locations that are known for high levels of wildlife road mortality or wildlife-vehicle collisions. Conduct a wildlife road mortality study at suspected problem areas. Look for areas where there could be large mammals, pond breeding amphibians near wetlands, etc.</p>	<p>As described in previous comments related to this element, wildlife mortality and vehicle collisions should be prioritized for further action. This suggestion comes from WDFW's Landscape Planning for Washington's Wildlife: Managing for Biodiversity in Developing Areas (A Priority Habitats and Species Guidance Document).</p>
<p>General Policy Suggestion</p>	<p>Design and site new and expanded roads and railroads to have the least possible adverse effect on the shoreline, account for sea-level rise projections, not result in a net loss of shoreline ecological functions, or adversely impact existing or planned water-oriented uses, public access, and habitat restoration and enhancement projects.</p>	<p>New roadways and railroads within shoreline jurisdictions should be avoided. This policy also aligns with the Department of Ecology's shoreline guidelines.</p>
<p>General Policy Suggestion</p>	<p>Eliminate parking minimum requirements and establish parking maximums.</p>	<p>This policy, which could be implemented in a development code, could help reduce impervious surfaces that exacerbate stormwater runoff and the urban heat island effect. This policy also could encourage active-transportation (walking, biking, riding transit) alternatives to driving automobiles; this reduces emissions, improves community health, and supports other co-benefits.</p>
<p>General Policy Suggestion</p>	<p>Encourage use of Low Impact Development techniques during the site planning and layout phase of a project, particularly in areas of high aquatic species diversity, salmonid-bearing streams, or</p>	<p>The importance of this policy is described in LU-P15 above.</p>

	shoreline habitat utilized by salmonids.	
Parks		
General Comment	General comment.	We greatly appreciate Medina’s commitment to their parks and open spaces, as well as cultural identity expression within these spaces. We particularly applaud the language used in PO-P9 with regard to habitat connectivity.
Capital Facilities		
CF-P1 Page 4	The Six-Year Capital Improvement Plan should be periodically updated to reflect the projected needs of the community.	We highly recommend including a prioritization list for culvert upgrades within this Six-Year Capital Improvement Plan. Please see comments in relation to LU-P7 above. This point may be better included in CF-P8.
General Policy Suggestion	Ensure that buildings are designed and built sustainably to reduce environmental impacts and remain resilient to extreme weather and other hazards worsened by climate change.	As mentioned in comments related to LU-P13 above, designing and protecting essential public facilities and the services they provide from future climate-related impacts helps ensure community resilience for the entire operational lifespan of the facility.
Utilities		
General Policy Suggestion	To the greatest extent feasible, avoid siting sewer system facilities within shoreline or riparian areas, or areas predicted to experience greater frequencies of climate-related flooding into the future.	The State Department of Health adopted rules establishing public health standards for location, design, installation, operation, maintenance, and monitoring of onsite sewage systems (OSS), including requiring setbacks from waterbodies (WAC 246-272A) which modern OSS systems, using pump systems, can support. Some OSS may meet public health standards even if located within RMZs; nevertheless, jurisdictions should exercise authority to ensure project proponents protect habitat functions of riparian critical areas.
General Policy Suggestion	Educate community on the importance of only discharging stormwater to the stormwater system while providing incentives to install rain gardens and other low impact development BMPs on private and public land.	Resources related to the adjacent policy suggestion include Olympia Rain Garden Incentive Program , Shoreline Soak It Up Rebate Program , Puget Sound Green Stormwater Infrastructure Incentives Programs , Green Stormwater Infrastructure Assistance Programs Guidebook , and the Rain Garden Handbook for Western Washington . While these are generally small-scale projects, the cumulative impact of widespread implementation

		can be significant, especially with regard to watershed-wide salmon recovery goals.
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Thank you for taking time to consider our recommendations to better reflect the best available science for fish and wildlife habitat 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.

Sincerely,



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