



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 8, 2024

SeaTac
Jenn Kester, Planning Manager
4800 S 188th St
SeaTac, WA 98188

RE: Case ID 2022-C-215, WDFW comments regarding SeaTac’s draft Comprehensive Plan

Dear Ms. Kester,

On behalf of the Washington Department of Fish and Wildlife (WDFW), thank you for the opportunity to comment on SeaTac’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
Land Use		
Goal 2.1 Suggested Policy Addition	Address the need for flexibility within developmental regulations to address environmental protection standards by updating regulations to include: <ul style="list-style-type: none"> Flexible subdivision design, such as cluster development or conservation subdivisions. 	These suggestions come from WDFW’s Landscape Planning for Washington’s Wildlife , which outlines that all landscapes, from the human-dominated (e.g., urban) to the relatively undisturbed (e.g., managed forests), can contribute to maintaining ecological health that benefits people and wildlife. We suggest a policy that directs development away from critical areas in the city’s comprehensive plan and allows for more creative ways to achieve density within the city limits.

	<ul style="list-style-type: none"> Flexibility in lot size and configuration, including on-site density transfers to accommodate habitat patches and corridors. 	
Policy 2.2L Page 16 of 67	Provide for connectivity in the street network to accommodate safe wildlife movement, fish passage , walking, bicycling, and transit use to promote health and well-being.	<p>We suggest considering wildlife movement when designing any project to minimize wildlife mortality and hazards to motorists.</p> <p>As housing densities increase, it is crucial to plan for wildlife movement now to avoid major conflict in the future, especially in rural areas that are near urban areas or in areas slated for future growth. 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.</p>
Residential Land Use GOAL 2.3 Suggested Policy Addition	Require site plans to show how new open spaces connect with existing adjacent open spaces. Additionally, efforts must be made to maintain connectivity between blocks of critical habitat areas when unavoidable impacts occur.	Open spaces should be designated, protected, and connected. We propose that along with requiring open space set-asides for residential development, site plans should demonstrate active efforts to connect these open spaces with others in the surrounding area. This open space connection could serve pedestrian opportunities and connectivity to wildlife habitats simultaneously. Additionally, open spaces are climate-resilient assets that can serve as community spaces. All development within dense or populated areas should strive for open space retention, creation, and <i>connection</i> for the benefit of people and the environment. Connecting wildlife habitats is also important to reduce safety concerns as it relates to wildlife collisions and conflict.
Manufacturing, Industrial, and Warehouse/Distribution Land Uses GOAL 2.5	Incorporate and require street trees, Low Impact Development (LID) techniques, and plantings in all land use designations when development occurs within the city.	We suggest that for all land use type sections within this element, a similar policy be added. Given SeaTac's highly impervious landscape, committing to Low Impact Development (LID) and vegetation retention techniques is critical for supporting salmon recovery and enhancing ecosystem health. According to the WRIA 9 Salmon Habitat Plan , salmon recovery in the

<p>Suggested Policy Addition</p>		<p>Green-Duwamish and Central Puget Sound Watershed relies heavily on improving water quality, managing stormwater, and restoring natural habitats. SeaTac, with its extensive impervious surfaces, contributes significantly to stormwater runoff, which can carry pollutants directly into water bodies, harming salmon habitat and water quality. By integrating LID and vegetation enhancement and retention approaches into land use projects, SeaTac can help reduce the negative impacts of urban runoff and support salmon recovery efforts. Additionally, these strategies contribute to broader environmental goals, such as improving air quality, enhancing public green spaces, and building climate resilience in the community.</p> <p>This would also help SeaTac address the GMA requirement, “counties and cities shall give special consideration to conservation or protection measures necessary to preserve or enhance anadromous fisheries,” (RCW 36.70A.172) and address commitments made by the city within the WRIA 9 interlocal agreement.</p> <p>As outlined in the WRIA 9 Salmon Habitat Plan, “Gilliam Creek drains approximately 1,900 acres. Its upper basin, contained within the city of SeaTac, is subject to poor water quality, erosion of the stream banks, and siltation within the stream corridor.”</p> <p>Resources for LID include the Sustainable Development Code website and the VISION 2050 Planning Resources Guidance on Integrating Stormwater Solutions into Comprehensive Plans.</p>
<p>GOAL 2.7 Accommodate essential public facilities in alignment with this Plan’s goals and policies.</p> <p>Suggested Policy Addition</p>	<p>Consider future climate conditions during the siting and design of essential public facilities infrastructure, including changes to temperature, rainfall, and flood potential to help ensure they function as intended over their planned life cycle.</p>	<p>Given that public infrastructure represents significant public investments, it is prudent to ensure that structures and roads are designed and sited to be resilient to climate impacts. Local governments should identify climate impacts predicted for their communities and review plans in the context of climate change projections to ensure that planned expansions, additions, and retrofits will be resilient throughout their intended lifespan</p>

		<p>and make changes as needed. 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>Streets with Trees Policy 2.8K Page 34 of 67</p>	<p>Preserve existing vegetation and street trees and encourage the expansion of the tree canopy throughout the city for the aesthetic, health, and environmental benefits trees provide. The city will pursue a tree canopy assessment to establish baseline conditions, followed by an annual urban canopy management plan report to assess if goals are being met. Existing, mature trees are imperative to the City's image and walkability.</p>	<p>To pursue the tree canopy's ability to provide shade, improve air quality, and increase carbon sequestration, we recommend pursuing a tree canopy assessment, followed by a tree canopy plan in order to assess trends, set goals, and measure progress towards those goals. 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 ordinances if there is not a system in place to track cumulative impacts over time.</p> <p>Resources:</p> <ul style="list-style-type: none"> • City of Tacoma 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. • Data resources include the USDA website, WDFW's change detection tree canopy data, the Puget Sound Washington Urban Canopy Project, and the WA DNR website. • Example ordinances and plans can be found on the MRSC website. • Funding resources can be found on the DNR website (Commissioner Franz Announces \$8 Million in Urban Forestry Grants). • Discover the value of the benefits provided by individual trees around your home and in your community with the National Tree Benefit Calculator. • See also the city of Everett's Tree Keeper website. • See also WDFW's Habitat at Home program, which encourages the protection of wildlife through purposeful vegetation planning.

<p>Parks, Open Space, and Greenbelts Policy 2.8M</p> <p>Page 34 of 67</p>	<p>Require developers to provide connected, publicly accessible open space (e.g., neighborhood pocket parks and plazas) as part of commercial development, and require private open space (e.g., decks, balconies, small yards, terraces, courtyards and children’s play areas in multifamily, and mixed-use developments.</p>	<p>See comments above in relation to Residential Land Use GOAL 2.3, Suggested Policy Addition.</p>
<p>Policy 2.8O</p> <p>Page 34 of 67</p>	<p>Require or incentivize the connection and linkage of parks, boulevards, neighborhood greenways, and other public open spaces, in any redevelopment.</p>	<p>See our suggestion of how to address this goal in our comments given for Land Use GOAL 2.3 above.</p>
<p>Urban Center</p>		
<p>Policy 3.3A</p> <p>Page 6 of 37</p>	<p>Promote and incentivize the design of neighborhoods and individual developments using techniques that reduce heat absorption, particularly in areas with less tree canopy and open spaces.</p>	<p>We greatly appreciate the adjacent policy. Some suggested resources to help achieve these goals include the Georgetown Climate Center's Green Infrastructure Toolkit, which provides funding models and approaches from U.S. municipalities. 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.</p> <p>See also Shoreline’s deep green incentive program that outlines how green development can participate in expedited review as well as fee waivers and/or reductions. The Sustainable Development Code website 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 city of</p>

		Issaquah and the city of Bellevue's clean building incentive programs that aim to assist applicants reach energy efficiency standards.
Neighborhoods		
Goal 4.1 Page 3 of 22	Facilitate equitable access to opportunity citywide by promoting the development of complete neighborhoods throughout SeaTac that provide diverse and affordable housing types, neighborhood-oriented services, healthy food, transportation choices, and connected parks and open space within one-half mile walking distance of all residents.	See comments above in relation to Residential Land Use GOAL 2.3, Suggested Policy Addition.
Goal 4.2 Page 4 of 22	Develop Neighborhood Villages at locations outside of the Urban Center that provide access to resident-oriented goods and services to local community members and include a range of moderately scaled housing options that are compatible with adjacent Neighborhood Residential areas and natural features .	Development in the less dense areas of SeaTac should not diminish ecosystem values, functions, and services, as these areas tend to contain more natural habitat compared to the city's more urbanized and developed regions. This additional habitat is vital for supporting local biodiversity, maintaining wildlife corridors, and ensuring healthy ecosystem services such as stormwater absorption, air purification, and temperature regulation. We suggest that SeaTac regularly update mapping information to clearly depict where open spaces, riparian corridors, and other important habitats and species are located in order to avoid these areas for future development and prioritize them for acquisition. Resources to help address this goal include WDFW's Priority Habitats and Species (PHS) mapping information, which can be found on our website (link).
Policy 4.7A Page 10 of 22	Encourage high-quality and innovative urban design for buildings and streetscapes in neighborhood centers and residential areas to create placemaking opportunities while providing a safe and convenient environment for wildlife	See comments above in relation to Residential Land Use GOAL 2.3, Suggested Policy Addition.

	movement, pedestrians, and bicycles.	
Housing and Human Services		
Policy 5.2A Page 6 of 44	Encourage development of residential areas and lots with adequate existing utilities and transportation systems, minimal ecosystem service disruption, and sited with climate-related hazards in mind , and prioritize the funding and development of infrastructure improvements to support the growing housing need in the city.	Prioritizing development that minimizes disruption to ecosystem services helps maintain critical functions like water filtration and stormwater management, protecting both the environment and community health. Additionally, by siting new projects with climate-related hazards in mind, the city can enhance resilience against risks like flooding and extreme weather, ensuring safer, long-term growth.
Transportation		
Goal 7.1 Page 5 of 69	...and local roads to improve safety and connectivity for pedestrians, wildlife , and bicyclists...	See comments above in relation to Residential Land Use GOAL 2.3, Suggested Policy Addition. As stated before, addressing safe wildlife movement enhances wildlife population health, decreases risks of collision with motorists, and can offer multi-benefit solutions in the form of pedestrian linkages (replacing culverts with large underpasses).
Policy 7.1 D Page 6 of 69	The city will implement stormwater retrofits and low-impact design techniques to address both lethal and sublethal impacts, including the tire dust chemical 6PPD-quinone, of transportation-related runoff to ensure the long-term viability of salmonids and additional aquatic species in urbanized watersheds.	We suggest this policy addition to align this section with the Federal Policy Priorities outlined and to help address GMA requirements , interlocal agreements , and overall ecosystem health. We suggest replacing “Implement green infrastructure to reduce stormwater pollution from transportation facilities where possible” with the adjacent edit.
Policy 7.3I Page 23 of 69	Invest in improvements to arterials to meet best practice standards including fish and wildlife passage , pedestrian and bicycle facilities, turn lanes, improved drainage, and enhanced traffic control and illumination. The improvements should be designed and	See comments above in relation to Residential Land Use GOAL 2.3, Suggested Policy Addition.

	constructed to improve safety, reduce maintenance costs, support economic development, reduce environmental impacts, and improve the quality of the transportation system for all modes.	
Policy 7.3R Page 27 of 69	Work with WSDOT to reconnect fish passage and wildlife habitat corridors , streets, and pedestrian and bicycle routes affected by the construction or extension of freeways and state highways. Identify WSDOT opportunities to mitigate potential disproportionate impacts on historically disadvantaged communities.	See comments above in relation to Residential Land Use GOAL 2.3, Suggested Policy Addition. The resources, WSDOT's Reducing the risk of wildlife collisions website as well as Wildlife Habitat Connectivity Consideration in Fish Barrier Removal Projects , are especially applicable here.
Policy 7.4A Page 29 of 69	Pedestrian, bicycle, and transit facility and access needs have been identified in the Transportation Master Plan.	We suggest the Transportation Master Plan also identify areas of high wildlife collision potential, areas of high wildlife frequency, and potential areas for habitat corridor connections.
Policy 7.7 Page 43 of 69	...An oversupply of parking can lead to inefficient land use, sprawl, further environmental degradation , and reduced use of alternative modes...	An oversupply of parking in SeaTac increases impervious surfaces, leading to greater stormwater runoff, pollution, and the urban heat island effect, while also encouraging car dependency and higher emissions. Additionally, excess parking takes up space that could be used for green infrastructure or sustainable development, missing opportunities to enhance environmental resilience and reduce ecological impacts.
Policy 7.7A Page 44 of 69	Additional parking strategies should be encouraged, including shared parking, reduced parking requirements in transit-rich areas, incentives for parking that utilizes pervious pavement and vegetation enhancement or a combination of LID techniques , and the transition of long-term parking from surface lots into structures that include non-	See comments in relation to Policy 7.1 D and Manufacturing, Industrial, and Warehouse/Distribution Land Uses GOAL 2.5 above. Consider solar panels to cover parking areas .

	parking uses in the Urban Center area.	
Parks, Recreation, and Open Space		
Policy 8.3B Page 8 of 33	<ul style="list-style-type: none"> • The proposed facility builds multi-use trails that connect parks, wildlife habitat corridors, and recreational facilities. 	See comments above in relation to Residential Land Use GOAL 2.3. Land acquisitions that consider both recreation and ecological connectivity create more resilient landscapes, reduce environmental degradation, and provide long-term benefits for both people (ecosystem services) and wildlife (supports healthy populations).
Policy 8.3D Page 9 of 33	<p>Identify lands appropriate for park and open space purposes including:</p> <ul style="list-style-type: none"> • Critical areas that protect natural ecosystems and the services they provide to the public • Spaces that facilitate climate resilience, such as vegetated areas for stormwater dispersal, flood mitigation, and carbon sequestration 	<p>Park plans and policies should prioritize the acquisition of areas that perform vital ecosystem services. Tree canopies help cool buildings, reduce the need for air conditioning, and provide wind protection that lowers heating demands. Retained vegetation enhances energy efficiency by optimizing passive solar heating and improving insulation. Additionally, vegetation helps manage stormwater, reducing reliance on energy-intensive systems. Protecting and restoring natural assets is often more cost-effective than engineered solutions. See FEMA’s guide Building Community Resilience with Nature-based Solutions, as well as software to track these resources from Natural Capital Project. Furthermore, see Kitsap County’s approach to quantifying ecosystem services through their Kitsap Natural Resource Asset Management Project.</p> <p>Additionally, LID (such as stormwater parks) can be a great way to provide multi-benefit avenues for the creation of both open space and natural stormwater filtration and dispersal areas. Resources include Olympia Rain Garden Incentive Program, Puget Sound Green Stormwater Infrastructure Incentives Programs, Green Stormwater Infrastructure Assistance Programs Guidebook, and the Rain Garden Handbook for Western Washington.</p>
Policy 8.3E Page 9 of 33	Establish and require recreation and open space in new commercial and residential	This edit can also be seen in relation to Residential Land Use GOAL 2.3 above. It is important to not only require open spaces but

	development, especially in new multifamily development. Require site plans to show how new open spaces connect with existing adjacent open spaces. Additionally, efforts must be made to maintain connectivity between blocks of critical habitat areas when unavoidable impacts occur.	also require the siting of these spaces to enhance recreational opportunities (linked open spaces provide trail opportunities) and critical area function (connecting habitat blocks to avoid habitat fragmentation).
Environment		
Policy 9.1B Page 6 of 48	Base regulations on the best available science to protect the functions and values of environmentally sensitive areas. Best practices for designating and protecting environmentally sensitive areas can change over time based on field and academic research.	Please see WDFW's resource page, which outlines best available science (BAS) resources, including WDFW's new (2020) riparian standards – link .
Policy 9.1E and 9.1F Page 7 of 48	Require development in the city to be located and designed in a manner that minimizes impact to natural features to the extent possible. Encourage and incentivize environmental stewardship on private and public lands to protect and enhance critical habitats, water quality, and other ecosystem functions.	We greatly appreciate these policies. Please see the following resources to help address these goals: <ul style="list-style-type: none"> • Whatcom County open space tax incentive program • WDFW's Habitat at Home Program • King County's Public Benefit Rating System Program (tax incentive program) • Snohomish County TDR Program • Issaquah TDR Program (map) • Redmond TDR Program • Redmond Open Space Preservation • Seattle Green Spaces and TDR
Policy 9.8G Page 15 of 48	Address sea level rise by siting and planning for relocation of essential public facilities and hazardous industries away from the 500-year floodplain.	We greatly appreciate this policy addition. This policy is crucial for protecting public safety, reducing future risks from climate change, and preventing environmental and economic damage by proactively relocating critical infrastructure and hazardous industries away from the 500-year floodplain, which is increasingly important as sea level rise and

		extreme weather events make the 100-year floodplain inadequate for long-term planning.
Wetland and Streams Map Page 27 of 48	General comment	<p>The buffer distances shown for streams on this map are undersized based on WDFW’s Best Available Science (BAS) standards outlined in Volume 2. For example, only streams labeled ‘Class 2; Salmonid Present (100’ Buffer)’ have any potential to mitigate pollutants, which is just one of the many ecological functions that must be protected to achieve no net loss. According to WDFW’s Volume 1 and Volume 2, buffer widths should not depend solely on fish presence, as all streams contribute to salmon recovery by supporting critical ecosystem functions.</p> <p>According to the Site Potential Tree Height mapping tool, stream riparian area widths range from 100-204 feet within SeaTac.</p>
Utilities		
Policy 10.1E Page 5 of 23	Work with services providers, local jurisdictions, and tribal governments to make a coordinated plan for long-term water protection and capacity to support future growth, and to address the potential impacts of climate change and fisheries protection has on the regional water resources.	We greatly appreciate this policy. Please see the resources associated with our comment above for Policy 7.3R Page 27 of 69. We recommend identifying fish passage barriers (WDFW map resource) and prioritizing corrections.
Goal 10.6 Page 8 of 23	Promote resource conservation and conversion to renewable resources or more efficient systems to meet increased demand for utilities.	<p>We recommend this section include the multi-beneficial use of conserving ecosystem services. An example policy might include:</p> <p>Encourage the conservation and restoration of natural ecosystems to provide cost-effective ecosystem services. By protecting and enhancing ecosystem services, the city can reduce the need for expensive infrastructure investments, improve climate resilience, and offer long-term savings on utilities for residents. These natural systems provide essential services like water filtration, energy savings through tree canopy cooling, and reduced pressure on stormwater infrastructure, all of which contribute to a</p>

		<p>more sustainable and affordable urban environment.</p> <p>See resources in response to Policy 8.3D Page 9 of 33 above.</p>
Capital Facilities		
<p>Goal 11.5</p> <p>Page 11 of 19</p>	<p>Facilitate and provide citywide services that are reliable, equitable, resilient, and environmental-sensitive.</p>	<p>We suggest SeaTac add a policy within this section that highlights the need for climate-related resiliency planning within the siting process for capital facilities. Given that capital 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 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>

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
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)

Julian Douglas, Habitat Biologist (Julian.Douglas@dfw.wa.gov)

Eric Guida, WA Department of Commerce (Eric.Guida@commerce.wa.gov)

