



CITY OF LAKE FOREST PARK CITY COUNCIL SPECIAL MEETING

Monday, November 04, 2024 at 6:00 PM

Meeting Location: In Person and Virtual / Zoom

17425 Ballinger Way NE Lake Forest Park, WA 98155

INSTRUCTIONS FOR ATTENDING THIS MEETING VIRTUALLY:

**Join Zoom Webinar: <https://us06web.zoom.us/j/85707777643>
Call into Webinar: 253-215-8782 | Webinar ID: 857 0777 7643**

The City Council is providing opportunities for public comment by submitting a written comment or by attending in person to provide oral public comment.

HOW TO PARTICIPATE WITH ORAL COMMENTS:

If you are attending the meeting in person, there is a sign in sheet located near the entrance to the Council Chambers. Simply fill the form out and the Mayor will call your name at the appropriate time. Oral comments are limited to 3:00 minutes per speaker. Oral comments are not being accepted via Zoom.

The meeting is being recorded.

HOW TO SUBMIT WRITTEN COMMENTS:

Written comments will be submitted to Council if received by 5:00 p.m. on the date of the meeting; otherwise, they will be provided to the City Council the next day. The City Clerk will read your name and subject matter into the record during Public Comments.

As allowed by law, the Council may add and take action on items not listed on the agenda. For up-to-date information on agendas, please visit the City's website at www.cityofflp.gov

Meetings are shown on the city's website and on Comcast channel 21 for subscribers within the Lake Forest Park city limits.

AGENDA

- 1. CALL TO ORDER**
- 2. PLEDGE OF ALLEGIANCE**
- 3. ADOPTION OF AGENDA**
- 4. PUBLIC COMMENTS**

The Council will not be accepting online public comments. This portion of the agenda is set aside for the public to address the Council on agenda items or any other topic the Council might have purview or control over. However, the Mayor or Council may not respond to comments from

*the public. If the comments are of a nature that the Council does not have influence or control over, then the Mayor may request the speaker suspend their comments. The Council may direct staff to follow up on items brought up by the public. **Comments are limited to a three (3) minute time limit.***

5. ITEMS FOR DISCUSSION, CONSIDERATION, AND/OR ACTION

- A. Proposed 2025-2026 Biennial Budget - City Council Deliberations and Recommendations.
- B. 2024 Lake Forest Park Comprehensive Plan Update.
- C. Executive Session - Potential Litigation pursuant to RCW 42.30.110(1)(i)

6. ADJOURN

FUTURE SCHEDULE

- Thursday, November 7, 2024, 6:00 p.m. City Council Special Work Session – *hybrid meeting (City Hall and via Zoom)*
- Thursday, November 7, 2024, 7:00 p.m. City Council Special Meeting – *hybrid meeting (City Hall and via Zoom)*
- Monday, November 11, 2024, Veteran’s Day – City Offices Closed
- Thursday, November 14, 2024, 6:00 p.m. City Council Special Meeting – *hybrid meeting (City Hall and via Zoom)*
- Thursday, November 21, 2024, 6:00 p.m. City Council Special Meeting – *hybrid meeting (City Hall and via Zoom)*
- Thursday, November 28, 2024, Thanksgiving Day – City Offices Closed
- Friday, November 29, 2024, Native American Heritage Day – City Offices Closed

This is a special meeting of the City Council. Action may only be taken on items listed on the agenda.

Any person requiring a disability accommodation should contact city hall at 206-368-5440 by 4:00 p.m. on the day of the meeting for more information.

2025-2026 Budget

City Council Special Meeting
Deputy Mayor, Lorri Bodi
Vice Chair, Tracy Furutani



November 4, 2024

Proposed Budget Reductions

Program	Biennial Value
Fleet Funding Strategy	\$ 202,912.00
Human Resources support	\$ 220,500.00
City Council professional services	\$ 9,000.00
City Council travel & training	\$ 11,700.00
Mayor's reserve	\$ 7,500.00
Mailbox program	\$ 4,000.00
Total value	\$ 455,612.00

The city resolves to evaluate each of these proviso's, based on merit, during the mid-biennial budget process, dependent on new sources of revenue.

Proposed Allocation of 002 Fund

- The Police Department has identified that officers are allocating roughly 7% of their time to reviewing Safe Walk Zone violations.
 - Allocate that portion of their salary and benefits to this new revenue.
 - Relieves General Fund 001 of roughly \$702,500
- The Municipal Court has identified that court clerks are allocating roughly 10% of their time to Safe Walk Zone violations.
 - Allocate that portion of their salary and benefits to this new revenue.
 - Relieves General Fund 001 of roughly \$82,580

Proposed Revenue Enhancements

- Adopt a solid waste utility tax
 - Funds will help offset current general fund deficit.
 - If other new revenues become available, this revenue stream could be allocated to providing a new Climate Project Coordinator position.
 - Monthly increase per household @ 10% - \$7.33 (90/96-gallon garbage can)

Solid Waste Utility Tax*	5%	6%	7%	8%	9%	10%
	\$ 128,450.00	\$ 154,140.00	\$ 179,830.00	\$ 205,520.00	\$ 231,210.00	\$ 256,900.00

*Source: Republic Services ESTIMATED

Proposed Revenue Enhancements

- Increase the surface water utility tax from 6% to 10%.
 - Funds will help offset current general fund deficit.
 - Monthly increase per household @ 10% - \$1.04

Sur. Water Utility Tax	\$	3,408,246.37	UT %	Double check	Increase from 6%
	\$	204,494.78	6%	\$ 204,494.78	
	\$	238,577.25	7%	\$ 238,577.25	\$ 34,082.46
	\$	272,659.71	8%	\$ 272,659.71	\$ 68,164.93
	\$	306,742.17	9%	\$ 306,742.17	\$ 102,247.39
	\$	340,824.64	10%	\$ 340,824.64	\$ 136,329.85

Proposed Revenue Enhancements

- Increase the sewer utility tax from 6% to 10%.
 - Funds will help offset current general fund deficit.
 - Monthly increase per household @ 10% - \$3.22

Sewer Utility Tax	\$	8,001,871.00	UT %	Double check	Increase from 6%
	\$	480,112.26	6%	\$ 480,112.26	
	\$	560,130.97	7%	\$ 560,130.97	\$ 80,018.71
	\$	640,149.68	8%	\$ 640,149.68	\$ 160,037.42
	\$	720,168.39	9%	\$ 720,168.39	\$ 240,056.13
	\$	800,187.10	10%	\$ 800,187.10	\$ 320,074.84

City utility tax rates

City	Utility	Rate
Kirkland	Solid waste	10.5%
	Sewer	10.5%
Woodinville	Solid waste	4.0%
Duvall	Water	6.0%
	Sewer	10.0%
	Surface water	10.0%
	Solid waste	6.0%
Kenmore	Solid waste	10.0%
	Surface water	6.0%
Shoreline	Solid waste	6.0%
Edmonds	Water	9.0%
	Surface water	8.5%
	Sewer	10.0%
Mountlake Terrace	Water	13.8%
	Sewer	10.0%
	Surface water	10.0%
Bothell	Solid waste	5.0%
	Water	11.2%
	Sewer	6.0%
	Surface water	6.0%
Yakima	Sewer	20.0%
	Solid waste	15%

Potential General Fund Impact

Category	Biennial Value
GF Deficit	\$ (3,100,000.00)
Proposed Reductions	\$ 455,612.00
New 10% solid waste utility tax	\$ 513,800.00
Increase Surface Water utility tax to 10%	\$ 136,330.00
Increase Sewer utility tax to 10%	\$ 320,075.00
Salaries to Proposed 002 Fund	\$ 785,121.00
GF Deficit	\$ (889,062.00)

Questions?



EQ: Environmental Quality & Shorelines



Introduction

The Environmental Quality Element Goals and Policies support the City's commitment to preserving and enhancing the natural environment. It includes policies that provide guidance on balancing environmental protection with development potential and recognizing environmental resources as an essential living infrastructure.

This element also ties the City's environmental policy guidance to several strategic and/or issue-specific plans that have been developed since the last Comprehensive Plan update. Those plans include the *Shoreline Master Program*, the *Community Forest Management Plan*, the *Wildlife Management Plan*, the *Legacy 100-Year Vision*, and the *Climate Action Plan*, links for which can be found throughout this Element and Background Analysis. The Environmental Quality & Shorelines Element Background Analysis (Volume II) provides narrative and details that support the Environmental Quality Element Goals and Policies, including the following sections:

- **Planning context**
- **Resident volunteers**
- **Recycling**



Goals and Policies



Goal EQ-1: Land Use Pattern

Protect the natural environment through zoning and land use decisions.

Policy EQ-1.1: Conserve designated sensitive areas, including ravines, steep slopes, wetlands, riparian zones, urban forests, and other features.

Designated sensitive areas include erosion hazard areas, landslide hazard areas, seismic hazard areas, steep slope areas, streams, wetlands, fish-bearing waters, areas with a critical recharging effect on aquifers used for potable water, flood hazard areas and the adjoining protective buffers necessary to protect the public health, safety and welfare (Lake Forest Park Municipal Code 16.24.020).

Commented [CH1]: Comment: Include urban forests or add an Urban forest Policy

Policy EQ-1.2: Encourage mixed-use commercial development and pedestrian-prioritized development, including housing, in any major redevelopment of the Town Center.

Transit-oriented development (TOD) describes a mix of housing, office, retail, and amenities integrated into a walkable neighborhood and anchored by high quality public transit.

Commented [CH2]: Comment: Definition does not define a term used in Policy 1.2. Did PC remove TOD reference?

Response: Thank you for the catch! Yes, TOD was removed.

Policy EQ-1.3: Promote the health and expansion of existing native and compatible vegetation in all elements of land use considerations, including infrastructure.

Policy EQ-1.4: Use the best scientific information available in an adaptive management approach to preserve or enhance the functions and values of sensitive areas through regulations, programs, and incentives. Implement integrated and interdisciplinary approaches to environmental planning strategies.

Policy EQ-1.5: Sustain and enhance the integrity of ecosystems.

Policy EQ-1.6: Incentivize LEED building standards, low impact development stormwater infrastructure, or other sustainable development standards, especially for development adjacent to sensitive areas, and consider adopting sustainable development standards for public facilities.

Leadership in Energy and Environmental Design (LEED) is a set of rating systems for the design, construction, operation, and maintenance of green buildings, homes, and neighborhoods.

Policy EQ-1.7: Ensure all residents have safe and viable access to a clean and healthy environment.

Policy EQ-1.8: Identify and mitigate unavoidable negative impacts of public actions with disproportionate impacts on vulnerable populations.



Goal EQ-2: Shoreline Development/Access

Protect the city’s shoreline while accommodating reasonable and appropriate uses near shorelines.

Policy EQ-2.1: Protect and enhance public access to the Lake Washington shoreline in adherence with the goals and policies of the Lake Forest Park *Shoreline Master Program* (SMP).

The Shoreline Master Program is an appendix to the Comprehensive Plan and is available online at: www.cityoffp.gov/DocumentCenter/View/1098.

Policy EQ-2.2: Facilitate community and neighborhood agreement on any proposal to improve shoreline access where the proposal has the potential to negatively impact private property owners.

Policy EQ-2.3: Promote education efforts that demonstrate the connection between stormwater drainage activities and the city’s water quality.

Policy EQ-2.4: Ensure safe pedestrian and nonmotorized access to the Lake Washington shoreline for all residents and promote a safe passageway through and across the adjacent SR 522.

Commented [CH3]: Comment: I agree with this in principle. But the only public Lake Washington access is the lakefront park, and safe crossings of 522 seem like it belongs in the transportation section, perhaps under T-2.

Response: This could be simplified by striking “and promote a safe passageway through and across the adjacent SR-522.” Having easy and convenient access to the water is valuable for many reasons, including during hot summer months (that are only getting hotter!)





Goal EQ-3: Water Quality Protection

Improve water quality by protecting and monitoring water from natural sources and through effective storm and surface water management.

Policy EQ-3.1: Promote the community as a model for stream restoration and enhancement.

Policy EQ-3.2: Protect critical aquifer recharge areas (CARAs) and the quality of groundwater used for public water supplies to ensure adequate and healthy future potable water.

Policy EQ-3.3: Coordinate with regional efforts to monitor water quality and identify sources of water pollution in the city's streams and Lake Washington.

Policy EQ-3.4: Increase public awareness and enforcement of regulations that prohibit illegal dumping.

Policy EQ-3.5: Ensure that new developments are connected to the sanitary sewer system. Support a long-term strategy to convert existing developments from onsite sewage systems to the sanitary sewer system and undertake all means reasonable to ensure the quality of water discharged from existing onsite sewage treatment systems. Support planning efforts to ensure sewage overflow does not enter Lake Forest Park's waterways.

Commented [CH4]: Comment: How many properties have not connected to sanitary sewer system?

Policy EQ-3.6: Maintain and enhance natural drainage systems to protect water quality, reduce public costs, protect property, and prevent environmental degradation, including supporting riparian restoration with or without partnership from community organizations.

Low-impact development (LID) is a stormwater and land use strategy that strives to mimic pre-disturbance hydrologic processes. LID measures emphasize conservation, use of on-site natural features, site planning, and integration of stormwater management practices into project design. Rain gardens and permeable hardscapes are examples of LID measures.

Policy EQ-3.7: Encourage low-impact development alternatives and appropriate enhancements of the street maintenance program to minimize urban runoff.

Policy EQ-3.8: Require appropriate mitigation measures through the City's development review process to reduce negative impacts to water quality from new developments.

Policy EQ-3.9: Coordinate with the regional agencies and neighboring jurisdictions to improve regional surface water management and salmon recovery efforts, resolve interjurisdictional concerns, and implement watershed-based action plans.

Commented [CH5]: Comment: Delete as noted

Commented [CH6]: Comment: I have asked WRIA 8's director how long LFP has been a member.

***Watershed action plans** are multi-jurisdictional plans that coordinate efforts to address water quality and storm water runoff problems that can contribute to flooding and property damage within a watershed that crosses the boundaries of two or more jurisdictions. The cities of Lake Forest Park, Edmonds, Lynnwood, Mountlake Terrace, Shoreline, and Snohomish County have formed a watershed forum to guide the development of a watershed action plan for the Lake Ballinger/McAleer Creek watershed. Additionally, the City has been an active member of the Lake Washington/Cedar/Sammamish Watershed Resource Inventory Area (WRIA) 8 Salmon Recovery Council since [year] along with 28 other local governments.*

Policy EQ-3.10: Support the removal or retrofit of existing public and private culverts and encourage daylighting of creeks wherever possible to restore natural waterways.

Commented [CH7]: Comment: Add as noted

Policy EQ-3.11: Support public education programs about the interconnection between urban streams and human activities.



Goal EQ-4: Development in Geologically Hazardous Areas

Encourage planning efforts to prepare for and recover from environmental disasters.

Policy EQ-4.1: Minimize risk posed by geological and flood hazard areas to people, property, and the environment.

Policy EQ-4.2: Regulate development in hazard areas to ensure that it does not cause safety risks, and that appropriate building standards and mitigation measures are used to address site conditions.

Policy EQ-4.3: Promote retention of vegetation and limit land disturbance in identified steep slope and landslide hazard areas.

Policy EQ-4.4: Protect existing natural areas that provide stormwater storage during flood and heavy rain events. Restore disturbed natural areas to return them to stormwater storage during flood and heavy rain events.

Commented [CH8]: Comment: Add as noted

Commented [CH9]: Comment: Add as noted

Policy EQ-4.5: Promote educational efforts to inform landowners and residents about hazard areas, how to prepare for emergencies, and resources available to mitigate risks.

Response: Consider "Restore disturbed natural areas to provide more stormwater storage..."

Goal EQ-5: Alternative Energy

Promote clean, renewable energy production and use throughout the city.

Policy EQ-5.1: Promote public and private clean energy pilot s and projects, such as a comprehensive network of electric vehicle charging stations or community solar projects, with the active participation of residents and businesses.

Policy EQ-5.2: Encourage reduced energy demand, support energy management technology, and encourage greater reliance on sustainable energy sources compared to conventional sources.

Policy EQ-5.3: Educate residents about incentives for emerging clean energy technology, such as tax exemptions for solar installations, and increase resident awareness of existing solar arrays and water heating systems in the city.

Policy EQ-5.4: Participate in regional efforts to create a state-wide clean energy policy and decrease local greenhouse gas emissions.

Policy EQ-5.5: Encourage businesses, residents, and new developments to utilize electric or solar energy.

Policy EQ-5.6: Facilitate the City's 70 percent recycling rate goal (as adopted by King County) and, having nearly achieved King County's goal, expand current recycling efforts, such as the battery recycling program at City Hall. Support efforts to implement Extended Producer Responsibility legislation at the state level.

Commented [CH10]: Comment: Add as noted.

Commented [CH11]: Comment: Perhaps there's a way to clarify what "reduced energy demand" means

Response: "Reduced energy demand" means any action or design feature that would use less power. This could include home retrofits, appliance upgrades, installation of solar panels, energy-optimized choices in the siting and design of new buildings, and personal choices such as turning the thermostat up or down.

Commented [CH12]: Comment: Agree with SCJ's point: reducing energy demand will encourage better home insulation, for instance.

Commented [CH13]: Comment: What are "energy management policies?"

Response: Energy management technologies are things like tracking systems for energy uses, smart thermostats, and other systems that help optimize the energy usage in a building.

Comment: Add to 5.2 or a new policy 5.7: "Encourage on-site energy storage and back-up systems in homes and businesses."

Response: I suggest adding this in EQ-9. This is likely to come up in the climate resilience sub-element, as it's a great way to support individual and community resilience.

Commented [CH14]: Comment: Make changes as noted.

Commented [CH15]: Comment: Wood stoves as opposed to what? This should be clearer if we are talking about cooking appliances or heating appliances. If heating, why wood stoves and not heat pumps? And if cooking, why wood and not induction or electric?

Response: This is an artifact from the 2015 Plan, but my interpretation is wood stoves for heating, which are big sources of emissions (especially particulate matter). Transitioning from a wood stove to a clean burning wood stove is great. An even better step would be transitioning from a wood stove to alternative fuels.

Perhaps rephrasing this policy as "Promote efficient heating systems, including home upgrades, retrofits and new construction."

Commented [CH16]: Comment: In light of our climate goals, should we be promoting ANY kind of wood-burning? Add "Encourage the use of non-combustion-based heating and cooking appliances."



Goal EQ-6: Air Quality, Noise Abatement, and Light Pollution

Support actions to improve air quality, reduce noise and light pollution, and minimize associated negative health effects.

Policy EQ-6.1: ~~Promote clean burning wood stoves within the city.~~ Encourage the use of non-combustion-based heating and cooking appliances.

Policy EQ-6.2: Encourage transportation infrastructure for buses, carpooling, nonmotorized transportation, and electric vehicles, and the planting of trees along arterials.

~~**Dark skies standards** seek to reduce light pollution by addressing urban sky glow, glare, light trespass, and light clutter.~~

Dark skies standards seek to reduce light pollution by addressing urban sky glow, glare, light trespass, and light clutter.

Commented [CH20]: Comment: Dark skies definition should be below this policy, not 6.2.

Policy EQ-6.4: Coordinate with other agencies and local governments in monitoring aircraft noise levels and flight patterns and in finding ways to minimize air traffic noise.

Policy EQ-6.5: Educate residents about noise and air pollution from gas-powered leaf blowers and similar machinery.

Policy EQ-6.6: Identify areas in the city with populations that are at higher risk of negative health effects, noise and light pollution, and lower air quality, and coordinate with the communities to explore focused solutions.

Policy EQ-6.7: Support litter pickup programs within the city to reduce the amount of waste that accumulates in roads, public spaces, neighborhoods, and natural habitats.



Goal EQ-7: Coexistence with Wildlife

Promote, support, and facilitate human coexistence with urban wildlife.

Policy EQ-7.1: Promote educational programs that help residents understand typical wildlife behavior, encourage empathy for wildlife, and emphasize human behavior modification as the primary means to minimize conflicts with wildlife.

Policy EQ-7.2: Promote current best practices for ~~Consider updating relevant regulations to promote~~ responsible pet and livestock guardianship.

Commented [CH21]: Comment: I have no objection to good animal guardianship, but I'm not sure what this policy really means

Policy EQ-7.3: Promote preventative measures to dissuade humans from interacting with wild animals.

Response: This is another artifact from the 2015 Plan. Essentially, this could be implemented through a review and possible update of code requirements related to animal care in LFPMC Title 6.

Policy EQ-7.4: Encourage the maintenance of native plantings **and compatible vegetation** in sensitive area buffers for wildlife when development occurs and encourage improvement to contiguous wildlife corridors whenever possible.

Commented [CH22]: Comment: Change to be more forceful. "Update relevant regulations to remain current with best practices and promote responsible pet and livestock guardianship."

Policy EQ-7.5: Discourage the use of pesticides, herbicides, and inorganic fertilizers.

Policy EQ-7.6: Increase fish habitat restoration efforts along the city's **and private** stream systems and along the lakeshore.

Response: This is an implementation action. The policy can be rephrased as "Promote current best practices for responsible pet and livestock guardianship," with the code update added to the implementation plan.



Goal EQ-8: Urban Forest Canopy

Officially recognize the city's **urban** forest canopy as a key regional resource and promote **tree-urban forest**

Commented [CH23]: Comment: Add as noted

Commented [CH24]: Comment: Add as noted

Commented [CH25]: Comment: Rename "Urban Forest" and revise throughout Goal

canopy conservation for a healthy and diverse community forest, which consists of both native and compatible non-native plant species.

Policy EQ-8.1: Maintain or exceed the minimum citywide urban forest 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 www.cityofflp.gov/DocumentCenter/View/6175.

Policy EQ-8.2: Develop a tree planting, inventory, and maintenance program for publicly-owned property that considers the species of trees that will be most successful in environments such as public rights-of-way. Pay special attention in the planting program to areas with vulnerable populations.

Policy EQ-8.3: Ensure zoning and subdivision regulations are consistent with the *Community Forest Management Plan* and review them regularly to ensure they do not disproportionately affect vulnerable communities.

Policy EQ-8.4: Maintain ~~a community~~ urban forest management plan advisory committee to monitor the implementation and effectiveness of the *Community Forest Management Plan* and ensure participation from a wide variety of residents.

Commented [CH26]: Comment: Would this be our Tree Board or is it another entity?

Policy EQ-8.5: Understand the effects of climate change to native trees and develop strategies to adapt to and/or mitigate the likely effects of climate change to the ~~community-urban~~ forest.

Policy EQ-8.6: Require all new private and public site developments include a tree-replacement plan that achieves or enhances urban forest canopy coverage goals.

Policy EQ-8.7: 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 properties.

Policy EQ-8.8: Continue to balance urban forest management with tree conservation efforts by streamlining the interface between private property rights and public safety.

Policy EQ-8.9: Support community education about the value of ~~trees~~ the urban forest for human health and mitigating the impacts of climate change.

Policy EQ-8.10: Partner with State Agencies to promote the importance of urban forest preservation.

Commented [CH27]: Comment: Include new policy

Policy EQ-8.11: Work with State Agencies to help fund urban forest protection and growth.

Commented [CH28]: Comment: Include new policy



Goal EQ-9: Climate Commitment

Protect environmental quality and community resilience in a changing climate.

Policy EQ-9.1: Identify areas with vulnerable populations and coordinate mitigation and recovery planning efforts with those communities.

Policy EQ-9.2: Encourage policies to increase tree-urban forest canopy cover in socially and economically disadvantaged neighborhoods.

Policy EQ-9.3: Support nonprofit organizations that provide education and participation in urban forest conservation strategies.

Policy EQ-9.4: Support and implement the goals of the City's Climate Action Plan.

Policy EQ-9.5: Encourage on-site energy storage and back-up systems in homes and businesses.

Policy EQ-9.6: Track and monitor the impact the urban forest has on the heat island effect and other climate impacts.



Goal EQ-10

Promote education on sustainable production and a circular economy.

Policy EQ-10.1: Support a sustainable and local food economy.

Policy EQ-10.2: Promote education on sustainable food production and waste reduction methods, like composting and food donations, to avoid food waste.

Policy EQ-10.3: Encourage zero waste through waste reduction programs and education on product lifecycles such as cradle-to-cradle design Extended Producer Responsibility.

Policy EQ-10.4. Coordinate efforts to reduce waste by making recycling and composting more accessible and efficient.

Commented [CH29]: Comment: Proposed EQ-9.4 In light of our Climate Action Plan

Commented [CH30]: Comment: Proposed EQ-9.4 In light of our Climate Action Plan

Commented [CH31]: New policy language from EQ-5.2 comments, which I recommend be added here.

Commented [CH32]: Comment: Proposed EQ-9.4 In light of our Climate Action Plan

Commented [CH33]: New policy language from EQ-5.2 comments, which I recommend be added here.

Commented [CH34]: Comment: Add new policy
Response: This is an implementation action. It could be rephrased as, "Promote education about the impact..."

Commented [CH35]: Comment: perhaps we could provide a definition of "circular economy"

Response: This is in the glossary.

Commented [CH36]: Comment: Add as noted

Commented [CH37]: Comment: "Extended Producer Responsibility" (<https://kingcounty.gov/~media/depts/dnrp/solid-waste/about/planning/documents/task-force-EPR-policy-framework.ashx?la=en> and <https://ecology.wa.gov/Waste-Toxics/Reducing-recycling-waste/Our-recycling-programs>) might be a more accessible term that has been used both at the county and state levels recently, and operationalizes the "cradle-to-cradle" idea.



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
Land Use Element		
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 WDFW website . 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 mapping resource . See also NOAA’s grant opportunity that addresses this,

		Restoring Fish Passage through Barrier Removal Grants.
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 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 .
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. Require site plans for new development to show how new open spaces connect with existing adjacent open spaces.	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 Regional Open Space Conservation Plan 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. Prioritize the implementation of an annual urban tree canopy management plan to track goals and benchmark progress within the city.	We encourage the city to take the baseline information from the Lake Forest Park i-Tree Ecosystem Analysis 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. It may not be enough to rely on ordinances if there is not a system in place to track cumulative impacts over time. Resources: <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.

		<ul style="list-style-type: none"> • 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>Policy LU–3.5 Page 21</p>	<p>Always consider implications of land use decisions on stormwater patterns and support incentivize low-impact development measures.</p>	<p>We encourage the city to participate in the effort to address environmentally sustainable development by utilizing incentives for LID. 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>
<p>Policy LU–3.6 Page 21</p>	<p>Support and incentivize the natural drainage and green infrastructure concepts and projects identified in the Legacy 100-Year Vision.</p>	<p>See comment above as well as Shoreline’s deep green incentive program which 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 Issaquah and Bellevue’s clean building incentive programs that aim to assist applicants in reaching energy efficiency standards.</p>
<p>Policy LU–3.7 Page 21</p>	<p>Recognize and support tree preservation as an integral part of community character. Collaborate with developers to assess the true costs of mitigation planting versus</p>	<p>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</p>

	<p>preserving existing vegetation, emphasizing the long-term environmental and economic benefits of retaining mature trees.</p>	<p>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.</p>
<p>Policy LU–5.6 Page 23</p>	<p>Inventory and encourage the redevelopment of underutilized commercial areas through regulatory techniques and incentives.</p>	<p>See the resources below:</p> <ul style="list-style-type: none"> • Whatcom County open space tax incentive 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
<p>Policy LU–6.3 Page 24</p>	<p>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.</p>	<p>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.</p>
<p>Policy LU–7.7 Page 25</p>	<p>Support the expansion of the City’s green resources to promote safer pedestrian, wildlife, and bicycle access movement along high-velocity traffic corridors.</p>	<p>See comment above and comments for Policy LU–2.2.</p>
<p>Policy LU–11.3 Page 26</p>	<p>Support developments that utilize clean energy or reduced energy consumption. Incentivize development that incorporates natural features to maintain ecosystem services.</p>	<p>See comments associated with Policy LU–3.5 and LU–3.6 above.</p> <p>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</p>

		Kitsap Natural Resource Asset Management Project.
Environmental Quality and Shorelines Element		
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 WDFW’s best available science (BAS) and management recommendations 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 ₂₀₀) are all integral components of ensuring no net loss of ecosystem values or functions occur. See RMZ widths via WDFW’s mapping resource . See also the Department of Ecology’s Climate Resilient Riparian Systems Grant .
Goal EQ-2 Page 29	Suggested Policy for Shoreline Development: 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.	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 Lake Washington/Cedar/Sammamish Watershed (WRIA 8) Chinook Salmon Conservation Plan 10-year Update 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 interlocal agreement signed by Lake Forest Park and GMA requirements, such as “counties and cities shall give special consideration to conservation or protection measures necessary to preserve or enhance anadromous fisheries,” (RCW 36.70A.172).
Goal EQ-2 Page 29	Suggested Policy for Shoreline Development: Minimize overhead lighting that would shine on the water surface	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 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 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 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 .
Policy EQ-3.7 Page 31	Encourage, prioritize and incentivize 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 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 .
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 and facilitate multi-benefit outcomes for climate resilience, as well as pedestrian and wildlife corridor linkages.	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 Wildlife Habitat Connectivity Consideration in Fish Barrier Removal Projects as well as WDFW's climate-change-resilient culvert webpage and Incorporating Climate Change into the Design of Water Crossing Structures: Final Project Report (2017) for resources on how to incorporate climate-resiliency into culvert designs.

		See also the location of fish passage barriers via WDFW's mapping resource .
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. Require development plans to include and visually demonstrate corridor connections on site plans.	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 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.	See resources in comments above, as well as WDFW's Habitat at Home 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 www.cityoflfp.gov/DocumentCenter/View/6175 .	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 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.	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>Housing Element</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"> • Whatcom County open space tax incentive 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
<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 connected network of parks and open space throughout the city and regionally.</p>	<p>See comments related to LU-2.2, LU-3.1, LU-6.3, and LU-7.7.</p>
<p>Capital Facilities Element</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. 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.</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 Climate Mapping for a Resilient Washington, as well as FEMA’s Resilience Analysis and Planning Tool (RAPT) to visualize these hazard areas.</p>
<p>Parks Trails and Open Space Element</p>		

<p>Goal PT-2: Trails Page 68</p>	<p>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. Special consideration shall also be given to enhance wildlife habitat corridor linkages.</p>	<p>See comments related to LU-2.2, LU-3.1, LU-6.3, and LU-7.7.</p>
<p>Goal PT-4: Environmental Protection Page 69</p>	<p>Suggested Policy: Review parks and grounds maintenance procedures and adopt written Best Management Practices that protect streams and riparian areas.</p>	<p>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.</p>
<p>Utilities Element</p>		
<p>Goal U-4: Environmental Impacts Page 77</p>	<p>Suggested Policy: 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.</p>	<p>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.</p>
<p>Policy U-5.1 Page 78</p>	<p>When expanding or upgrading utilities, consider environmental justice criteria as well as future climate-related impacts in making decisions.</p>	<p>It is important to plan for utility infrastructure that will be resistant to future flooding and additional climate-related conditions.</p>
<p>Transportation Element</p>		
<p>Policy T-1.8 Page 83</p>	<p>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, fish and wildlife movement, and the connecting street network.</p>	<p>See comments related to LU-2.2, LU-3.1, LU-6.3, and LU-7.7.</p>
<p>Policy T-1.11 Page 83</p>	<p>Review and update roadway and sidewalk standards to ensure they meet multimodal transportation needs and encourage wider</p>	<p>See comment above.</p>

	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 Reducing the risk of wildlife collisions website as well as Wildlife Habitat Connectivity Consideration in Fish Barrier Removal Projects .
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

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