



State of Washington
Department of Fish and Wildlife
South Central Region 3 – 1701 S. 24th Ave., Yakima WA 98902-5720
Phone: (509) 575-2740, Fax (509) 575-2474

October 2, 2026

Bill Preston
SEPA Responsible Official
City of Yakima
129 N. 2nd St
Yakima WA 98901

Subject: WDFW Comments on City of Yakima 2026 Periodic Update – SEPA#017-26,
PlanView # 2022-C-413

Dear Mr. Preston,

The Washington Department of Fish and Wildlife (WDFW) has reviewed the draft of the updated City of Yakima Comprehensive Plan 2026, SEPA#017-26. We appreciate that many great elements have been included in the plan to preserve and enhance urban aquatic and terrestrial habitats. We provide these comments to help improve future iterations of the Comprehensive Plan in accordance with WDFW's mission to preserve, protect and perpetuate the state's fish, wildlife and ecosystems.

The following comments include technical edits in addition to recommended strategic policies and plans to ensure protection and restoration of fish and wildlife habitat. We also recommend incorporation of habitat elements into the city's parks and open spaces. We look forward to working with City of Yakima to develop these strategies and would be happy to meet with the city to discuss our comments.

Chapter 2. Land Use

2.4 Goals and Policies

Policy 2.1.3 Suggested new criteria under this policy: Avoid UGA expansions of areas that contain critical areas and open space coverage required under [RCW 36.70A.110.\(8\)\(d\)](#).

Policy 2.1.9 Consider annexation requests in accordance with review criteria, including, but not limited to:

We recommend adding "Review of critical areas to ensure that annexation is consistent with critical areas protection". We recommend incorporating WDFW's Priority Habitats and Species (PHS) [mapping information](#), to assess suitable areas for accommodating growth.

Policy 2.1.13 Use best available science when designating critical areas for protection and preservation within the City limits or the Yakima UGA.

We recommend adding "no net loss" to this policy.

Future Land Use Map. Exhibit 2-4

There are areas of fish and wildlife habitat, primarily shrubsteppe and riparian in the UGA and to a lesser extent in the city limits where the city should explore options to enroll some of these habitat areas into natural open space. Enrolling these areas into natural open spaces would preserve the habitat and reduce future conflicts with development with the critical areas ordinance. WDFW would be happy to work with the city to explore strategies.

Chapter 6. Transportation

Transportation Improvement Projects (TIP)

In addition to showing locations for TIP on Exhibits 6-9 and 6-10, we recommend including a table that outlines what is proposed at each location and the timeline for each project. Any projects involving a water crossing, such as a culvert or a bridge, should be coordinated with WDFW and likely would need a Hydraulic Project Approval (HPA) from WDFW.

6.5 Goals and Policies:

We encourage the city to add a goal that ensures transportation projects are consistent with natural areas protection and are climate resilient.

To support that goal, we encourage the city to add the following policy:

Design and upgrade stream crossings to be climate resilient.

WDFW climate resilient culvert guidance can be of assistance: <https://wdfw.wa.gov/species-habitats/habitat-recovery/fish-passage/climate-change>

Chapter 9. Parks and Recreation

We encourage the city to add a goal that promotes fish and wildlife habitat within the city's parks. Fish and wildlife species rely on urban habitats for both their survival and their migration to habitats within Yakima County and beyond. Suggested goal and associated policies:

Goal: Encourage the development and retention of native habitat within parks, open space and greenbelts.

Policies:

- Explore opportunities to install habitat elements into the city parks, such as xeric native plant gardens.

WDFW would be happy to work with the city and supply our technical knowledge. We would encourage working with the North Yakima Conservation District through the Heritage Garden program [Heritage Garden Program – North Yakima Conservation District](#).

- Retain, maintain and install native habitats within city parks, open space and greenbelts to provide habitat for urban fish and wildlife.
 - Develop a plan for prioritizing habitat elements within parks, open space and greenbelts using tools such as connectivity to larger natural spaces and wildlife habitat.
- WDFW can provide technical assistance in developing priorities and strategies.

Chapter 10. Natural Environment

10.2 Conditions and Trends

Under critical areas, “wildlife habitat conservation areas” are listed. Please amend to “fish and wildlife habitat conservation areas”, the recognized name for this critical area under the Growth Management Act (GMA).

Fish and Wildlife Habitat Conservation Areas (FWHCA)

There are mapped shrubsteppe habitats within the city and the UGA. Shrubsteppe is a WDFW Priority Habitat. Please add to the list of FWHCA and add to Exhibit 10-10.

Exhibit 10-11. Sensitive Fish Species Identified in the City's Streams and Rivers

The following are documented in WDFW Statewide Washington Integrated Fish Distribution (SWIFD). Please add them to the table.

Coho Salmon: Bachelor Creek

Chinook Salmon: Bachelor Creek

Mountain Whitefish: Naches River

Wildlife. Wood Duck and Great Blue Heron are listed in Exhibit 10-11. We recommend moving them to a separate wildlife table. In addition to the wildlife species listed in the narrative at the bottom of page 10-21, we recommend adding Monarch as there are documented sightings within the city.

10.4 Goals and Policies

Goal 10.4 PRESERVE AND ENHANCE TERRESTRIAL AND AQUATIC HABITATS TO MAINTAIN VIABLE POPULATIONS OF PLANTS AND ANIMALS.

Policy 10.4.4 Protect aquatic and terrestrial habitats from encroachment from new ~~industrial~~ land uses that may reduce these habitat's resilience and environmental quality.

Recommend striking the word "industrial". All land uses may reduce aquatic and terrestrial habitats.

Suggested new policy under this goal - Consider climate stressors when determining allowed activities and uses within wetlands and Fish and Wildlife Habitat Conservation Areas, and ensure regulations maintain habitat integrity and function. Dept of Commerce, [Menu of Measures](#) (#99)

We recommend adding a policy that promotes habitat connectivity. Suggested wording: Seek to protect and connect open space corridors with regulatory and voluntary mechanisms to maintain and enhance habitat connectivity ([WAC 365-196-335](#)). This policy supports the resiliency sub-element (RCW36.70A.070(9)(ei)(A)). That sub-element directs plans to identify, protect, and enhance natural areas to foster resiliency to climate impacts, as well as areas of vital habitat for safe passage and species migration. The policy could direct the city to connect habitat areas within the city and UGA to habitat areas outside the city, using areas like riparian corridors and wildlife corridors. This policy would help to ensure the fish and wildlife species using the city's habitats could connect to areas outside of the city and the UGA to areas in Yakima County and beyond. WDFW would be happy to provide technical assistance with implementing this policy.

Chapter 11. Shoreline

Goal 11.96. ALL SHORE STABILIZATION ACTIVITIES SHOULD BE DESIGNED AND CONSTRUCTED TO ACCEPTED ENGINEERING STANDARDS

We recommend adding a policy regarding Shoreline Armoring: Prioritize soft armoring over hard armoring of shorelines for new and redevelopment. We recommend using techniques from [Integrated Streambank Protection Guidelines | Washington Department of Fish & Wildlife](#). All

shoreline armoring projects would need a Hydraulic Project Approval (HPA) permit from WDFW.

Goal 11.115. EXISTING AGRICULTURE SHOULD BE ENCOURAGED TO PROVIDE THROUGH VOLUNTARY MEANS

Please clarify the intent of this goal. Voluntary Stewardship Program (VSP) applies to Yakima County, not the City of Yakima. Agricultural uses within the city's shoreline environment should be subject to the city's Shoreline Master Program (SMP).

Thank you again for the opportunity to comment. Please contact Scott at 509-607-3578 or Scott.Downes@dfw.wa.gov if you have questions and to arrange a time to discuss our comments.

Sincerely,



Scott Downes
Regional Land Use Lead



Danny Didricksen
WDFW Region 3 Habitat Program Manager

Cc: J. Shah, WDFW
Marian Berejikian, WDFW
Trevor Martin, City of Yakima
Benjamin Serr, Commerce