

Sophia Cassam

From: Lynda Guernsey
Sent: Thursday, February 11, 2021 9:19 AM
To: Sophia Cassam
Subject: FW: Climate Change Additions, SJ Comprehensive Plan
Attachments: Attachment A (EATComp Plan).docx; Attachment B (EATComp Plan).docx; Attachment C (EATComp Plan).docx; Attachment D (EATComp Plan).docx

Hi Sophia,

Please see the comment email below and attachments for the Planning Commission. I have forwarded to the Planning Commission.

Regards,
Lynda

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Subject: Climate Change Additions, SJ Comprehensive Plan

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Dear Planning Commissioners & County Council Members:

The Environmental Action Team (“EAT”) of the Orcas Women’s Coalition believes that the reality of climate change and its impacts must be incorporated in all considerations of the County’s Comprehensive Plan. In researching methods for incorporating climate change considerations in each of the Plan’s Elements, we found Bainbridge Island’s methodology both elegant and expedient.

Below are four attachments. We propose that Attachments A, B and C be included in the “Introduction” of the Plan. Attachment D shows our suggested wording changes to each Element.

We propose our Attachment A, **“Guiding Principles and Policies,”** be placed after our Plan’s current Vision Statement and Table 2 but before Item 4, “The Planning Process”. These **“Guiding Principles and Policies”** are lifted almost verbatim from a similarly-entitled section in the Bainbridge Island plan. These

principles and their subsequent policies are written in a manner that may be applied to all the Elements in our Plan.

In our Attachment B, we've provided a description of "**Types and Degrees of Policy Direction.**" Such clarification is lacking in the current Plan's introduction.

In Attachment C, we propose two graphs be inserted, one showing the State's "**Greenhouse Gas Reduction Targets**" adopted in June, 2020 and the other offers a basic description of the "**Clean Energy Transformation Act**" ("**CETA**") adopted in May, 2019. The State has recommended the GHC target model be added as an actual Element to Comprehensive Plans and we agree.

Because the Shoreline Management Plan ("SMP") Element of the Plan has been finalized just last week, our group may be willing to file a docket to amend the SMP to ensure that it's also specifically guided by the Vision Statement and our proposed Guiding Principles & Policies, and since we found no reference to "climate change" even now in that Element.

Thank you for your consideration.

Respectfully,

The **Environmental Action Team (EAT)** of the *Orcas Women's Coalition*

(Attachment “A”)

Guiding Principle #1

Reduce *greenhouse gas* emissions and increase the County’s *climate resilience*.¹

Guiding Policy 1.1

Mitigation: Participate with state, regional and local partners to reduce greenhouse gas emissions consistent with the 1990 benchmark and future year targets set forth in state law, educate the public about climate change and incentivize County activities including land use patterns and building practices that reduce greenhouse gas emissions.

Guiding Policy 1.2

Adaptation: Minimize or ameliorate the impacts of climate change on our community and our County’s ecosystems through climate-informed policies, programs and development regulations.

Guiding Policy 1.3

Evaluate the climate vulnerabilities and implications of County actions and identify policies that alleviate those vulnerabilities. Consider the effects of shifting conditions (sea level rise, changing rainfall patterns, increasing temperatures and more extreme weather events) and the effects they may cause (altered vegetation, wildfires, changing water demands, economic shifts).

Guiding Policy 1.4

Encourage compact development that safely accommodates walking and other non-motorized transportation.

Guiding Principle #2

Preserve the special character of our County’s rural atmosphere and function, historic buildings, extensive forested areas, meadows, *farms*, marine views and access, and scenic and winding roads supporting all forms of transportation.

¹ *EAT refers to **climate resilience** throughout these attachments as, “the ability to anticipate, prepare for, and respond to hazardous events, trends, or disturbances related to climate. Improving climate resilience involves assessing how climate change will create new, or alter current, climate-related risks, and taking steps to better cope with these risks.” Planning Staff should add this term and its definition to Section 2.3 of the UDC with other definitions of terms used in the Comprehensive Plan.*

Guiding Policy 2.1

Develop a County-wide conservation strategy to identify and apply effective methods to preserve the natural and scenic qualities that make the County a special place, including better protection for the shoreline, trees, soils, native plants, and farms.

Guiding Policy 2.2

Accommodate new growth in designated centers that meet the County's identified needs for housing, goods, services and jobs while respecting conservation and environmental protection priorities.

Guiding Policy 2.3

The built environment represents an important element of the County's special character. Improve the quality of new development through a review process that implements the community vision and supports long-term goals for the preservation of the County's special character.

Guiding Principle #3

Manage the water resources of our County to protect, restore and maintain its ecological and hydrological functions and to ensure clean and sufficient surface- and groundwater for future generations.

Guiding Policy 3.1

Manage the water resources of San Juan County for the present and the future, recognizing that the County's finite groundwater resources [aquifers] are critical perennial sources for our surface waters and the ecosystems they support. Moreover both groundwater and surface water resources are the sole sources of our residents' water supply.

Guiding Policy 3.2

As part of long-range land use planning, consider the impacts of future development to the quality and quantity of water that will be available to future San Juan County Islanders and to the natural environment. Maintain clean and sustainable² surface water as well as sustainable groundwater withdrawal. Protect aquifer recharge areas, guard against seawater intrusion and prevent adverse impacts to water quality from surface pollution.

² (RE: both **"Sustainable"** and **"sustainability"**) EAT refers to The Brundtland Commission and the Intergovernmental Panel on Climate Change ("IPCC") definition of such terms throughout these EAT attachments as "development that meets needs of the present without compromising the ability of future generations to meet their own needs." The Planning Staff should add these terms and their definition to Section 2.3 of the UDC.

Guiding Policy 3.3

Preserve and protect the ecological functions and values of the County's aquatic resources.

Guiding Policy 3.4

Anticipate and prepare for the consequences of climate change on our aquatic resources. These changes include sea-level rise, altered precipitation patterns, as well as any other changes in climate and community response to climate in order to ensure ample quality, quantity and seasonal integrity of surface water and groundwater for the County's people and ecosystems.

Guiding Policy 3.5

Create a San Juan County surface and groundwater management plan for the purpose of maintaining the long-term health of our fresh water aquifers and surface waters.

Guiding Policy 3.6

Recognize the importance of our water resources to present and future generations of San Juan County Islanders, and apply the "*precautionary principle*."³

Guiding Policy 3.7

Recognize the water resource needs of farms, home gardens and domestic landscapes and support planning and conservation practices that ensure the sustainable use of our County's finite groundwater resources. Educate the community about sustainable water use practices.

Guiding Principle #4

Foster diversity with a holistic approach to meeting the needs of San Juan County and the human needs of its residents consistent with the stewardship of our finite environmental resources.

³ EAT uses the phrase "**precautionary principle**" as that defined in Article 3 of the United Nations Framework Convention on Climate Change (UNFCCC) to mean that "parties should take precautionary measures to anticipate, prevent, or minimize the causes of climate change and mitigate its adverse effects." SJC Planning Staff should add this term and definition to Section 2.3 of the UDC.

Guiding Policy 4.1

Ensure a variety of housing choices to meet the needs of present and future residents in all economic segments and promote plans, projects and proposals to create affordable, year-round housing.

Guiding Policy 4.2

Make budget decisions that adequately consider the well-being of all County residents with the goal of providing opportunities to be contributing members of the community.

Guiding Policy 4.3

Support, protect and enhance the value of the arts and humanities as essential to the education, quality of life, economic vitality, the broadening of mind and spirit, and as a treasure in trust for our descendants.

Guiding Principle #5

Consider the costs and benefits to County residents and property owners in making land use decisions.

Guiding Policy 5.1

Respect private property rights protected by the State and U.S. Constitutions.

Guiding Policy 5.2

Recognize that private property rights are not absolute but must be balanced with necessary and reasonable regulation to protect the public health, safety and welfare of our community.

Guiding Principle #6

The use of land in the County should be based on the principle that the County's environmental resources are finite and must be maintained at a sustainable level.

Guiding Policy 6.1

Regulate all development in the County consistent with the long-term health and carrying capacity of its natural systems.

Guiding Policy 6.2

Recognize that the sustainable use of the County's finite land base is served by 'green building' practices.

Guiding Policy 6.3

Preserve and enhance the County's natural systems, natural beauty and environmental quality.

Guiding Policy 6.4

Protect and enhance wildlife, fish resources and natural ecosystems throughout the County through the recognition of the critical importance of both keeping these natural systems intact or restored.

Guiding Policy 6.5

Recognize and protect in our County the "Usual and Accustomed" fishing, hunting and gathering areas of Treaty Tribes.

Guiding Policy 6.6

Recognize and respect indigenous peoples' broad and deep knowledge of our County's natural ecosystems through the long history and continuation of their stewardship.

Guiding Principle #7

Nurture San Juan County as a *sustainable community* by meeting the needs of the present without compromising the ability of future generations to meet their own needs.

Guiding Policy 7.1

Promote environmental sustainability by supplementing the State's mandated 20-year horizon with a horizon of one hundred years in order to recognize the longer-term life cycles of natural systems. Tailor green building practices and public infrastructure investments to be in line with this longer-term perspective.

Guiding Policy 7.2

Promote an equitable social environment in the County by addressing basic human needs including affordable year-round housing, personal health and safety, mobility and increased access to human services, civic and cultural amenities all with particular attention to our community's indigenous people, people of color and historically-underserved people.

Guiding Policy 7.3

Promote economic sustainability and work to provide economic opportunities for all community residents.

Guiding Policy 7.4

Promote food production through *regenerative agriculture*⁴ as part of the land use planning process.

Guiding Principle #8

Support the County's *Guiding Principles* and Policies through the County's organizational and operating budget decisions.

Guiding Policy 8.1

Promote good governance and a County culture of citizenship, stewardship and civic engagement, and continually strive to improve government transparency and accessibility of such information via a 'user-friendly' County website.

Guiding Policy 8.2

Update each County Department's work program annually, allocate sufficient time and resources and provide needed policy direction to achieve consistency with and implement the *Comprehensive Plan* in a manner that is transparent and consistent with the community *Vision*.

Guiding Policy 8.3

Grow a diversified and vibrant local economy.

Guiding Policy 8.4

Nurture a healthy and attractive community including a focus on the quality of the built environment through progressive development regulations and reviews.

⁴ *EAT defines this as farming and grazing practices that, among other benefits, reverse climate change by rebuilding soil organic matter and restoring degraded soil biodiversity – resulting in both carbon drawdown and improving the water cycle.*

Guiding Policy 8.5

Build reliable infrastructure and connected mobility that encourages physical activity such as biking and walking while also respecting the Island's scenic qualities.

Guiding Policy 8.6

Grow a green, well-planned, environmentally sustainable community.

Guiding Policy 8.7

Plan for a safe County where citizens, County Officials, and Law Enforcement work together in an environment of accountability and trust.

Guiding Policy 8.8

When implementing policies, consider the longer-term, indirect or unintended consequences of decisions.

(“Attachment B”)

“Types and Degrees of Policy Direction

The Elements in this Comprehensive Plan consist of Goals and Policies. Goals express the high-rank order values that are most important to the Island community. They are aspirational, frequently describing desired outcomes. The Policies listed under each Goal identify strategies or specific actions to be taken to move the community in the direction of fulfilling the Goal.

Depending on the issue and the Element, the Goals and Policies may provide direction to the County Council, Planning Commission, Hearing Examiner and County Staff. Some of the actions will take the form of land use or other development regulations; others will be capital projects or programs; and still others may take the form of outreach, education, coordination or partnership with citizens, organizations or other units of government.

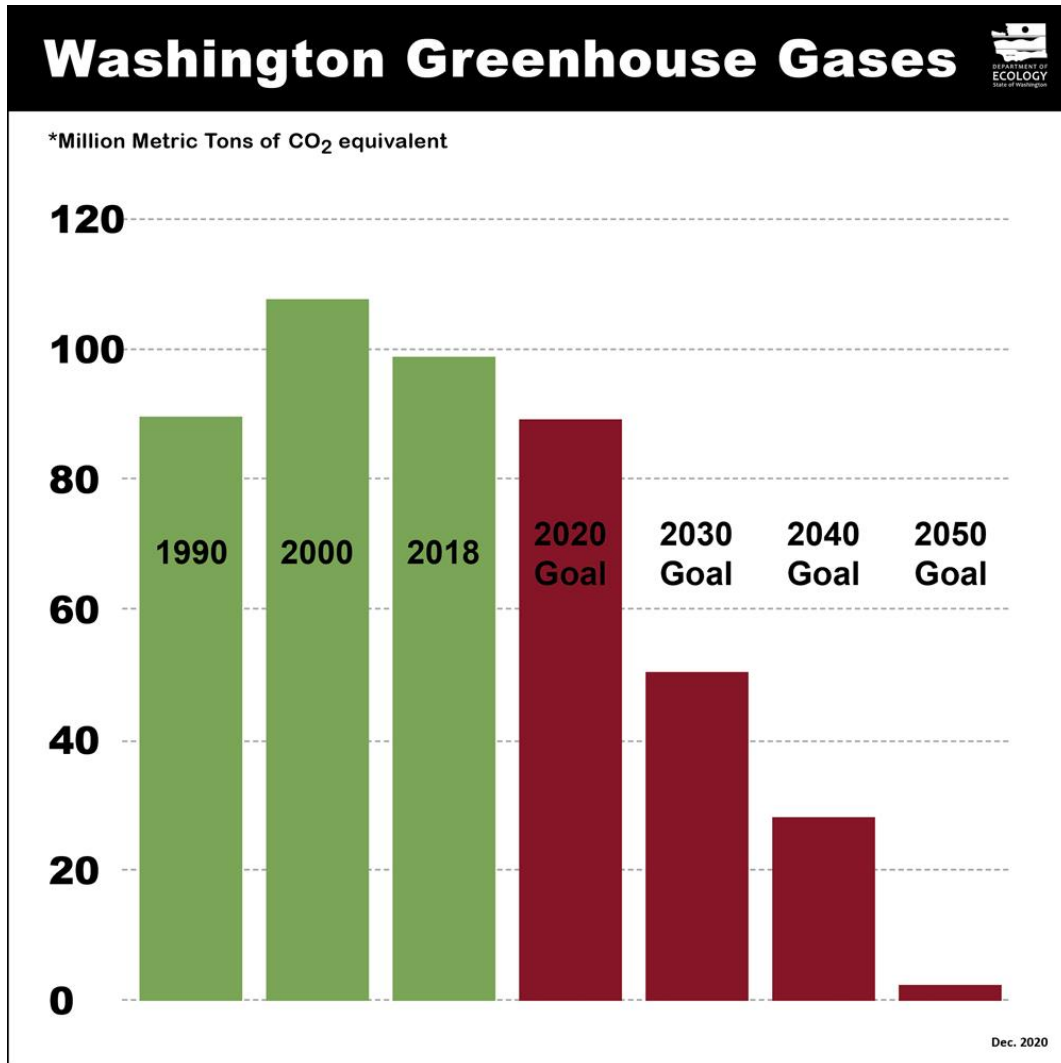
The goal and policy statements sometimes use directive verbs such as “maintain” or “adopt.” In other cases, less directive verbs are used such as “consider” or “encourage.”

The more directive verbs convey a higher rank order of *policy* direction. Directive goal or policy language may call for the updating of development regulations, however that does not convert them into controls or conditions that can be directly applied to a permit decision.

A similar distinction can be made between the auxiliary verbs “*should*” and “*shall*.” Both terms are used in the *Comprehensive Plan* and it is intended that both provide substantive direction. The difference in meaning between “should” and “shall” is one of degree rather than kind. As used in this Plan, the word “shall” imparts a higher order of substantive direction than the word “should.” However as with the active verbs, the use of “*shall*” remains substantive *policy* direction not a land use control within the GMA meaning and definitions cited above. “

(“Attachment C”)

{Planning Commission and County Council: the following Washington State mandates should appear in the Introduction section of our Plan because of their critical importance, and be updated with our County’s progress towards their respective benchmarks as required by the State. The WA Greenhouse Gases reduction targets should be an actual Element of the Plan.}



GHG reduction targets

In 2008 the Washington Legislature set new GHG emission targets that went into effect June 11, 2020 in order to combat climate change. The more protective targets aim to reduce emissions levels by:

- **2020** - reduce to 1990 levels.
- **2030** - 45% below 1990 levels.
- **2040** - 70% below 1990 levels.
- **2050** - 95% below 1990 levels and achieve net zero emissions.

“Clean Energy Transformation Act (CETA)



On May 7, 2019, Governor Jay Inslee signed into law the Clean Energy Transformation Act (CETA) ([E2SSB 5116, 2019](#)), which commits Washington to an electricity supply free of greenhouse gas emissions by 2045.

(Attachment D)

[EAT's suggested modifications to wording within each Element of the Plan are below and highlighted in yellow.]

Governance:

(Section 1.2, add phrase)

Goal: To conduct the activities of San Juan County government in ways that are ethical, fair, just, timely, and impartial; to provide those public services necessary for the health, safety, general well-being of the citizens **and in keeping with the Guiding Principles and Policies**; and to serve the taxpayers by managing public programs effectively and economically.

Land Use: *(a draft of this element not posted to website as of January 31, 2021)*

(Was formerly the Section 2.1.A entitled "Purpose"? If so EAT would add a sentence like this to any introductory section)

"This Land Use element shall be guided by the county-wide Vision Statement as well as the Guiding Principles and Guiding Policies of the Plan".

Water Resources:

(Section 4.1, "Introduction and Purpose" – add sentence)

Over the next 20 years, the goals and policies in this section will guide the people of San Juan County in assuring fresh, clean water for the current and future needs of all species. They necessarily recognize four conditions. The first is that rainfall generally measures between eighteen and twenty-two inches per year, relatively little in the Pacific Northwest. The second is that precipitation is concentrated between November and March. The third is a geologic profile dominated by bedrock domes and cemented glacial till, and the fourth is the unique, multiplicity of island based, disconnected watersheds. **Further, desalination of water must be considered as a last resort due to the non-sustainable impact this technology has on the natural environment and the tremendous amount of energy required in its operation.**

(Section 4.2.A, "General Policies", Item 19 – add sentence)

19. Encourage voluntary enhancement such as rain water catchment, storm water retention & other technologies that will benefit water quality and quantity related to this element. **Curtail the use of desalination for both commercial and residential uses due to its negative impacts on the natural environment and the large amounts of energy the process requires.**

(Section 4.2.F. “Data Collection Goal & Policies” – add phrase)

Goal:

To compile existing data, and when necessary to collect new data to support responsible and effective decision making on water resource issues, and make findings available to the public.

(Section 4.2.F. “Data Collection Goal & Policies,” under “Policies, Item 4 “– add sentence.)

4. Support an on-going program of ground and surface water monitoring to identify water quantity, quality and changes over time. Make monitoring reports available to the public.

Housing:

(Section 5.1. “Introduction,” add two new sentences, 1st paragraph)

“This Vision identifies Housing as a foundational human need, necessary to create the vibrant and diverse community we envision. Moreover the Guiding Principles & Policies recognize the need to 1) foster diversity with a holistic approach in meeting the housing needs of its residents as well as its finite environmental resources, and 2) promote an equitable social environment in the County by addressing affordable year-round housing, personal health and safety, mobility and increased access to human services and civic and cultural amenities all with particular attention to our community’s indigenous people, people of color and historically-underserved people. In addressing the challenge of housing the County’s people...”

Transportation:

(Section 6.1.A “Purpose and Background,” amend 1st sentence, 1st paragraph)

“The purpose of the Transportation Element is to establish goals and policies that will guide the development of air, marine, and land transportation facilities and services in San Juan County, in a manner consistent with the overall goals of the Comprehensive Plan (Plan), Vision Statement and the Guiding Principles and Guiding Policies.”

Capital Facilities:

(Add an excerpt as follows, below the existing “2036 Vision Excerpt,” and before the Section 7.1, “Introduction”)

“GUIDING PRINCIPLE EXCERPT

Guiding Principle #5 ...The use of land in the County should be based on the principle that the County’s environmental resources are finite and must be maintained at a sustainable level.”

Utilities:

(Section 8.1, “Introduction,” add phrase to 4th paragraph...plus add a new paragraph below the 4th paragraph)

“This Element supports the Plan Vision, the **Plan Guiding Principles and Policies** and fulfils [sic] the **1)** requirements of the Growth Management Act (GMA) for utilities planning **and complies with the Clean Energy Transformation Act (CETA)**. Regarding energy, the Vision states, “Our community strives for energy independence...we use renewable energy.” Regarding communication systems, the Vision affirms that “Advanced communication infrastructure is encouraged...we encourage new ideas and new technology...[and] communication systems support our economy.

The Plan’s Guiding Principles and Policies state, “Nurture San Juan County as a *sustainable* community by meeting the needs of the present without compromising the ability of future generations to meet their own needs...tailor public infrastructure investments to be in line with this longer-term perspective...When implementing policies, consider the longer-term, indirect or unintended consequences of decisions.”

Historical and Archeological Preservation:

(EAT has no additions to this Element.)

Economic Development:

(Section 10.2.B, “Purpose” amend final sentence of final paragraph...)

“The economy of the San Juan Islands is inextricably linked to its environment. Enterprises that consume or threaten to consume nonrenewable natural resources that the County’s economy depends on are not endorsed. The county’s economic plans are driven by County residents’ goals for the future of the community itself as set forth in the Vision statement **and the Guiding Principles and Policies** of this *Plan*.”