



SAN JUAN COUNTY
DEPARTMENT OF COMMUNITY DEVELOPMENT

135 Rhone Street, PO Box 947, Friday Harbor, WA 98250
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REVISED DETERMINATION OF NONSIGNIFICANCE

Proposal: This proposal is a non-project amendment to the San Juan County Comprehensive Plan. The 2036 San Juan County Comprehensive Plan Update includes amendments to the following Elements: Governance, Land Use and Rural, Water Resources, Housing, Transportation, Capital Facilities, Utilities, Historic and Archaeological Preservation, and Economic Development. The Comprehensive Plan proposals include extension of the County's planning horizon to 2036 with updated growth targets, and policy and text amendments to correspond with changes to state and regional guidance, reflect evolving community vision and county policy, increase readability, clarify direction, remove redundancies, and add new/updated information. Amendments to the Comprehensive Plan Official Map are proposed to provide greater capacity and flexibility for residential development, expand the Friday Harbor UGA to encompass Port of Friday Harbor properties that are already zoned for and in some cases developed with urban uses, and adjust designations to match existing property conditions.

Applicant: San Juan County Department of Community Development

San Juan County, the lead agency for this proposal, has determined that this proposal will not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required. Under WAC 197-11-340(2), a Determination of Non-significance was issued on July 12, 2022. The determination was made after a review of a completed environmental checklist. The applicant is reissuing the DNS to allow for more time to receive public comment and for mailing and posting of required notifications.

Copies of the proposed changes to the 2036 San Juan County Comprehensive Plan Update, SEPA Determination & associated documents are available upon request. They may be viewed during business hours at the Department of Community Development, 135 Rhone Street, in Friday Harbor. For more information, please contact David Williams at the DCD office or (360) 378-2354.

Comments on this determination must be submitted by October 14, 2022, to David Williams, Director, San Juan County DCD, PO Box 947, Friday Harbor, WA, 98250 or compplancomments@sanjuanco.com. Email subject line: Comments on Comprehensive Plan SEPA Determination. For more information, please contact David Williams at the DCD office or (360) 378-2354.

Following a final decision this determination may be appealed with the underlying action to Superior Court or State Boards as provided in RCW 36.70A, RCW 90.58, and RCW 36.70C. For appeals to Superior Court the appeal period is 21 days and for appeals to the Growth Management Hearing's Board the appeal period is 60 days.

Responsible Official: David Williams, Director
Department of Community Development
(360) 378-2354

Date: September 7, 2022



San Juan County Community Development & Planning

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REQUEST FOR REVIEW

DCD FILE # PCOMPL-17-0001

DATE: September 7, 2022

PROJECT NAME: San Juan County Comprehensive Plan Update

Please review the materials and return written comments to compplancomments@sanjuanco.com by October 14, 2022

Project website: <https://www.sanjuanco.com/1079/Comprehensive-Plan-Update>

State Agencies	
X	Dept. of Archaeology
X	Dept of Archaeology & Historic Preservation/SEPA
X	Dept. of Agriculture – Kelly McLain
X	Dept. of Commerce
X	Dept. of Ecology/SEPA
X	Dept. of Ecology/Shoreline – Chad Yunge
X	Dept. of Fish and Wildlife – Marcus Reaves
X	Dept. of Fish and Wildlife/SEPA
X	Dept. of Health/SEPA
X	Dept. of Health – Kelly Cooper
X	Dept. of Health - Shellfish
X	Dept. of Natural Resources/SEPA
X	Dept. of Natural Resources – NW Region
X	Dept. of Social & Health Services
X	Dept. of Transportation Env Svcs
X	Dept. of Transportation – Ferries – Robert Price
X	Energy Facility Site Evaluation Council–Stephen Posner
X	WA Recreation and Conservation
X	Parks and Recreation Commission
X	Puget Sound Partnership/SEPA
X	Puget Sound Partnership
X	UW-Friday Harbor Labs, Director
X	Washington State Parks NW Region
Tribal Agencies	
X	Lummi Historic Preservation Office
X	Lummi Natural Resources – Shoreline
X	Lummi Natural Resources - Biologist
X	Lummi Cultural Resources
X	Samish Indian Nation – Jackie Ferry
X	Swinomish Tribal Commission – Tim Hyatt
X	Tulalip, Natural Resources
County Agencies	
X	San Juan County Council
X	San Juan County Planning Commission
X	San Juan County Prosecutor – Amy Vira
X	San Juan County Assessor
	San Juan County Community Development & Planning
	Chief Building Official

County Agencies (Cont.)	
X	San Juan Co PW County Engineer – Colin Huntemer
X	San Juan Co PW Project Engineer – Christine Coray
X	San Juan County Health Dept – Kyle Dodd
X	San Juan County Parks Dept
X	San Juan County Dept of Emergency Management
X	San Juan County Fire Marshal
X	Fire Districts (Indicate: #2, #3, #4, or all)
Town, Utilities, & Utility Districts	
X	Town of Friday Harbor
X	Eastsound Sewer & Water District
X	Fisherman Bay Sewer District
X	Fisherman Bay Water Association
X	Washington Water Service Company
X	OPALCO
X	CenturyLink
Schools and Libraries	
X	School District: Lopez Orcas San Juan Shaw
X	Libraries: Lopez Orcas San Juan Shaw
Other	
X	San Juan Conservation District
X	SJC Noxious Weeds
X	San Juan County Parks
X	Eastsound Planning Review Committee
X	Deer Harbor Plan Review Committee
X	Lopez Village Plan Committee
X	Agricultural Resource Committee
X	San Juan County Land Bank – Lincoln Bormann
X	Port of Friday Harbor

Distribution completed by: Lynda Guernsey Date: 9/8/22

San Juan County Comprehensive Plan Update

SEPA Expanded Environmental Checklist for the San Juan County 2036 Comprehensive Plan Update

June 2022

Reissued September 2022

PREPARED FOR:



SAN JUAN COUNTY
DEPARTMENT OF COMMUNITY DEVELOPMENT
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SECTION 1. INTRODUCTION

San Juan County has prepared this expanded Washington State Environment Policy Act (SEPA) Environmental Checklist to study the potential environmental implications of the proposed San Juan County Comprehensive Plan 2036 Update. The environmental review is intended to help identify potential environmental issues early in the public review process, concurrent with considerations of possible policy changes. It is intended that the County and public will use the environmental analysis to help shape decisions on the proposed update.

This environmental document has been prepared in a manner consistent with the requirements of SEPA. The standard Environmental Checklist form has been integrated with an expanded description and analysis of the proposal to support future decision-making.

The document is organized as follows:

1. **SEPA Environmental Checklist Part A.** Part A provides background information on the proposal and proponent. Part A serves as a fact sheet, as established in WAC 197-11-235(3)(b).
2. **Summary.** Provides a brief overview of the information considered in this environmental document, including a short description of the proposal and findings of the environmental issue papers. This summary fulfills the requirement for an environmental summary established in WAC 197-11-235(3)(b).
3. **Proposal Overview.** Includes a description of the proposal, state and regional policy framework and environmental review process.
4. **SEPA Environmental Checklist Part B.** Includes a statement that Part B is not required to be completed in an integrated SEPA/GMA document.
5. **SEPA Environmental Checklist Part D.** Contains the questions and responses to the SEPA Checklist Supplemental Sheet for Non-Project Actions.
6. **Environmental Issue Papers.** Includes nine issue papers that correspond to comprehensive plan elements and discusses the potential implications of the proposed action.
7. **SEPA Environmental Checklist Part C.** Contains the SEPA Checklist signature page.

SECTION 2. PART A: BACKGROUND

1. Name of the proposed project, if applicable:

San Juan County 2036 Comprehensive Plan Update

2. Name of applicant:

San Juan County, Department of Community Development

3. Address and phone number of applicant and contact person:

San Juan County
Department of Community Development
135 Rhone Street, PO Box 947
Friday Harbor, WA 98250
Contact: David Williams, Community Development Director
360.378.2354

4. Date checklist prepared:

June 2022

5. Agency requesting checklist:

San Juan County

6. Proposed timing or schedule (including phasing, if applicable):

San Juan County began review of the San Juan County Comprehensive Plan Update in mid-2016. Although the plan is just now being adopted in 2022, the planning horizon of 20 years (2036) was established at the outset of the planning process, and therefore the proposal is referred to as the 2036 Plan Update.

The Department of Community Development is expected to make a recommendation on the draft Plan Update to the County Council in early summer. County Council action on the Comprehensive Plan is anticipated to occur by fall 2022.

The Comprehensive Plan is updated periodically, as needed. Each update will be accompanied by appropriate SEPA review.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

The Comprehensive Plan is reviewed and amended on an ongoing basis to reflect changing conditions and requests from members of the public. The Plan is implemented through San Juan County Code (SJCC), and amendments to the Code are anticipated based on Plan guidance. Each of these actions will be subject to independent SEPA review and threshold determinations.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

There are no previously prepared reports specifically on this proposed 2036 Comprehensive Plan Update. An Environmental and Economic Impact Statement (EEIS) was issued in 1996, and a Supplemental Environmental Impacts Statement (SEIS) was issued in 1997 for the Comprehensive Plan that was adopted in 1998.¹ Since that time, various studies have been used to inform and update the plan, and are referenced in the current Comprehensive Plan.²

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

The Comprehensive Plan provides policy guidance for San Juan County. On an ongoing basis, the County receives private and public proposals for land use and other actions that are within the area covered by the Comprehensive Plan. These proposals are reviewed for consistency with the current adopted Comprehensive Plan and implementing regulations.

10. List any governmental approvals or permits that will be needed for your proposal, if known:

- Board of County Commissioners approval of Comprehensive Plan Update
- Certification of GMA compliance by Washington Department of Commerce

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page.

The proposal is the 2036 update of the San Juan County Comprehensive Plan in accordance with the requirements of the Growth Management Act (GMA). In general, the Plan Update is intended to revise and refine the current GMA Comprehensive Plan policy direction to reflect changed conditions and evolving County policy since prior Plan adoption. The County's Comprehensive Plan was originally adopted in 1998, and the County has been updating and revising the Plan and associated development regulations from time to time since then. The 2036 Plan Update is a major update to the Comprehensive Plan and includes:

- **Updated growth targets.** Extension of the County's GMA planning horizon to 2036 and adoption of new growth targets.
- **Policy and text amendments.** Revisions associated with changes in state and regional guidance; updates to reflect evolving County policy; rewrites and editorial changes in policies to increase readability, clarify direction, and remove redundancies; and addition of new or updated information, goals, and policies, since adoption of the Comprehensive Plan.

¹ San Juan County, *Final Environmental Impact Statement and Final Supplemental EIS* (October 10, 1996, and November 12, 1997), accessed June 2022, www.sanjuanco.com/DocumentCenter/View/1062/Appendix-9-Final-EEIS-10-2-96-and-Final-SEIS-11-12-97.

² San Juan County, *San Juan County Comprehensive Plan* (December 20, 1998, April 27, 2010), accessed June 2022, www.sanjuanco.com/510/Comprehensive-Plan.

- **Comprehensive Plan Official Maps amendments.** Proposed amendments to provide greater capacity and flexibility for residential, industrial, and commercial development. The Comprehensive Plan Official Maps is a policy map that shows how the County plans to distribute residential, commercial, industrial, open space, and other uses throughout the County. The land use designations shown in the Comprehensive Plan Official Maps are regulatory and any changes directly affect the way property is regulated under the County's Unified Development Code (SJCC Title 18).

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

San Juan County is part of an archipelago of 743 islands in the Salish Sea in northwest Washington State. To the west lies Haro Strait and Boundary Pass, marking the international boundary between Canada and the United States; to the east lies Rosario Strait; and to the south lies the Strait of Juan de Fuca. Sixty islands are inhabited, and four (Lopez, Shaw, Orcas, and San Juan) are served by Washington State Ferries, sailing from Anacortes, Washington. The total land area is approximately 180 square miles with about 375 miles of shoreline abutting 600 square miles of inland sea. See **Figure 2-1, San Juan County Vicinity Map.**

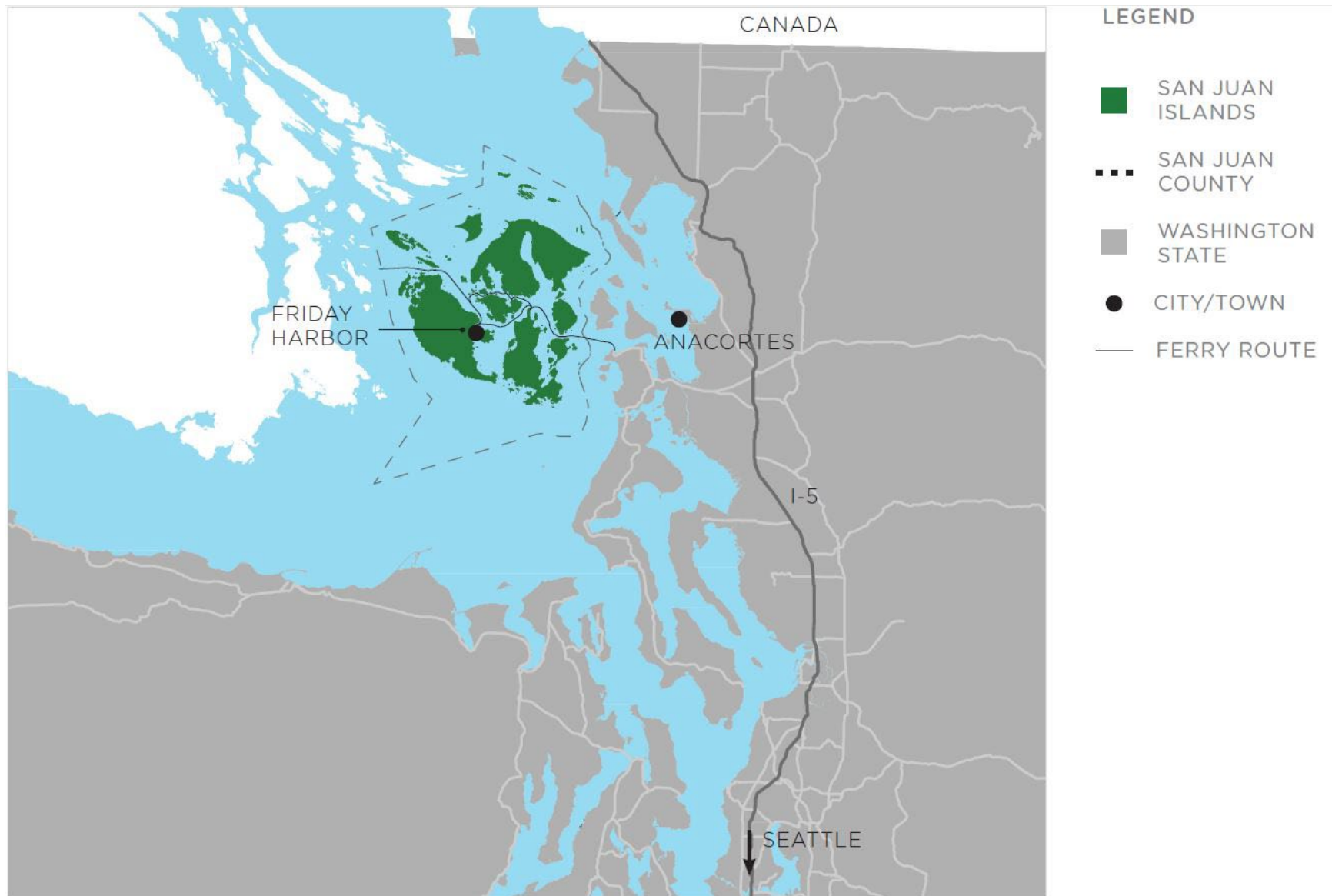


Figure 2-1
San Juan County Vicinity Map

SECTION 3. SUMMARY

This section provides a brief overview of the information considered in this environmental document, including a short description of the proposal and findings of the environmental issue papers. More information on these topics is found throughout the document.

3.1 Proposal

The proposed action is the 2036 update of the San Juan County Comprehensive Plan in accordance with the requirements of the Growth Management Act (GMA). In general, the proposed update intends to revise and refine the current GMA Comprehensive Plan policy direction to reflect changed conditions since prior planning adoption. The County's Comprehensive Plan was originally adopted in 1998. The 2036 update is considered a major update to the Comprehensive Plan and will extend the planning horizon and reflect updated state and regional guidance and changed local conditions. The update includes updated growth targets, policy and text amendments, and Comprehensive Plan Official Maps amendments, discussed below.

- **Updated growth targets.** Extension of the County's GMA planning horizon to 2036 and adoption of new growth targets consistent with the Skagit County countywide planning process.
- **Policy and text amendments.** Revisions associated with changes to state and regional guidance and to reflect evolving county policy; language and editorial changes to policies to increase readability, clarify direction and remove redundancies; and addition of new or updated information since adoption of the current Comprehensive Plan.
- **Comprehensive Plan Official Maps amendments.** Proposed amendments to provide greater capacity and flexibility for residential development, expand the Friday Harbor UGA to encompass Port of Friday Harbor properties that are already zoned for and in some cases developed with urban uses, increase allowable residential densities on some Eastsound parcels, and adjust designations to match existing property conditions. For additional information on the proposal, refer to the Land Use and Rural Issue Paper.

3.2 Environmental Analysis

The issue papers contained in Section 7 document the environmental analysis of proposed amendments to all applicable elements of the County's Comprehensive Plan. For each element, the papers provide a review of existing and proposed policy changes, and an analysis of potential environmental implications associated with proposed new or amended policies. The Comprehensive Plan elements and subsequent key issue papers include:

- Governance
- Land Use and Rural
- Housing
- Water Resources
- Transportation
- Capital Facilities
- Utilities
- Historic and Archaeological Preservation
- Economic Development

3.3 Summary Table

A summary table that highlights key issues and related SEPA implications is shown at the beginning of each issue paper. These summary tables have been compiled into a single summary table, **Table 3-1**. For additional information on each of these topics, refer to Section 7, *Environmental Issue Papers*.

Table 3-1 Summary of Key Issues

Key Issues	Potential Impacts
Section 7.2, Governance	
<p>Governance <i>Do policies provide a framework for public decision-making in San Juan County?</i></p>	<p>Additional policy guidance seeks to integrate climate change as a consideration in the County's regulatory decision-making. The environmental impact of this policy would likely be positive.</p>
Section 7.3, Land Use and Rural	
<p>Residential Land Capacity <i>Is the supply of vacant and redevelopable land sufficient to accommodate the 20-year planned population/housing growth?</i></p>	<p>With the proposed changes, the supply of vacant and redevelopable land is sufficient to accommodate 2036 projections for planned population/housing growth. No significant impacts would occur.</p>
<p>Employment Land Capacity <i>Is the supply of vacant and redevelopable land sufficient to accommodate the 20-year planned employment growth?</i></p>	<p>There is sufficient capacity to accommodate the projected employment growth.</p>
<p>Land Use Compatibility <i>Do planned land uses impact compatibility?</i></p>	<p>Proposed amendments to the Comprehensive Plan Official Maps would not impact land use compatibility. No significant impacts would occur. Policy language in the draft Land Use and Rural Element and existing regulations in the County Code would help to mitigate any minor compatibility impacts associated with growth and development.</p>
<p>Resource Lands <i>Do planned land use patterns support protecting resource lands?</i></p>	<p>The proposed changes to goals and policies further promote the conservation and protection of agricultural resource lands, forest resource land, and mineral resource land. Significant adverse environmental impacts are not anticipated.</p>
<p>Community Character <i>Do planned land use patterns enhance community character?</i></p>	<p>The draft Land Use and Rural Element includes policy language to articulate the broad strategies the County will use to preserve the general character of unincorporated UGAs. No significant adverse environmental impacts are anticipated.</p>
<p>Rural Lands <i>Do the planned land use patterns protect and enhance rural lands?</i></p>	<p>The draft Land Use and Rural Element provides a definition for rural character and establishes policies that allow rural development in designated rural lands while protecting rural character. No significant adverse environmental impacts are anticipated.</p>
<p>Climate Change <i>How is climate change considered related to land use patterns?</i></p>	<p>The draft Land Use and Rural Element includes climate change goals and policies with a framework to integrate climate change in land use planning. No significant adverse impacts of these policies are anticipated.</p>

Key Issues	Potential Impacts
<p>Agriculture <i>Do the policies and plan protect agricultural lands and support agriculture?</i></p>	<p>Proposed new goal and policy language focuses on protecting agricultural land and providing for uses that support economically viable agriculture. No significant adverse environmental impacts are anticipated.</p>
<p>Section 7.4, Water Resources</p>	
<p>Water Resources <i>Do policies protect San Juan County's water resources?</i></p>	<p>Existing and amended goal and policy guidance seeks to protect the County's water sources, ground and surface water, storm and surface water, and natural resources. The environmental impacts of these policies would likely be positive. Although the number of policies has been greatly reduced, the overall effect of the policies should remain comprehensive and provide equal or greater protection to water resources.</p>
<p>Section 7.5, Housing</p>	
<p>Housing Affordability <i>Do policies support and encourage the provision of housing for a variety of household incomes, including low income?</i></p>	<p>Existing and proposed policies support the creation of more affordable options, with an emphasis on year-round residents, employees in essential services, and people experiencing homelessness.</p>
<p>Housing Diversity <i>Do policies support a range of housing types that meet the community's needs?</i> <i>Do policies address changing housing needs associated with an aging population and the problem of homelessness?</i></p>	<p>No major changes to the housing mix are proposed. Existing and proposed policies seek to expand the range of housing types the County should consider to meet housing needs. This includes recognition that younger people have trouble finding housing that is affordable within the limits of their income, while the population of older and retired people continues to grow. Options such as RV parks and small home parks would be considered to address low-income affordability and homelessness, but no specific plan is offered to allow these types of housing.</p>
<p>Section 7.6, Transportation</p>	
<p>Consistency with Other Plans, Maintaining Levels of Service <i>Does the Element provide for projected growth consistent with other aspects of the Comprehensive Plan and other County plans?</i></p>	<p>Updates to the Transportation Element include updated analysis of projected traffic volumes consistent with other elements of the Comprehensive Plan, and policies to ensure that projects are consistent with other San Juan County plans, the Washington State Ferries Long Range Plan (WSF LRP), and the Coordinated Human Services Transportation Plan (CHSTP). Consistency with other plans and policies while maintaining levels of service helps minimize environmental impacts associated with traffic growth. Coordination with other plans would not directly result in any impacts.</p>
<p>Safety and Mobility <i>How are safety and mobility considered for all modes of transportation?</i></p>	<p>Proposed policy updates support increasing mobility and improving safety for non-motorized modes, barge freight, ferries, transit, bike/moped travel, and boats. The change in LOS D criterion could limit the number of future projects to improve roadway mobility and safety. This could result in fewer impacts to the natural environment, but would mean that travelers could experience higher volumes and possibly higher congestion than under the current AADT criterion for LOS D. The replacement of County LOS standards for ferries with support for the WSF LRP would not materially affect which projects will be built, because those are primarily in WSF control. Changes to barge policies clarify existing policies and would minimize potential impacts on the natural environment. Overall, mobility would increase and safety would improve. No significant impacts are anticipated.</p>

Key Issues	Potential Impacts
<p>Operations, Maintenance, and Management <i>Does the Element address effective use of existing facilities?</i></p>	<p>The change to the criterion for an LOS D rating means that road improvements may occur at fewer locations. This would place greater emphasis on maintenance of existing transportation facilities, but affects only a small number of roads. The new policies also support the 2040 WSF LRP vision, which includes a strategy to maintain reliable service through 2040 by preserving existing vessels. Overall, more emphasis on preservation of existing infrastructure would minimize potential adverse impacts on the natural environment, but could result in impacts to the built environment, such as mobility and safety, if volumes increase.</p>
<p>Sustainability <i>Does the Transportation Element consider the natural environment and human health concerns related to transportation?</i></p>	<p>The proposed policies support environmental sustainability, which would result in a more resilient community and resource-conserving community practices. New policies could increase projects for road maintenance, flood and erosion control, and could include relocation of some facilities. New policies also support measures to reduce greenhouse gas (GHG) emissions, but these are generally not expected to result in adverse impacts, except that they could increase demand for electricity. Noxious weed policy changes reflect adopted code and current practice and therefore are not expected cause adverse effects.</p>
<p>Equity <i>Does the Transportation Element provide for equitable access to all modes of transportation, and consider disadvantaged or vulnerable communities?</i></p>	<p>Proposed policy updates incorporate by reference the CHSTP, which was adopted in 2015 to address equity in transportation planning. The policy change is in recognition of an ongoing program and therefore no impacts are expected. Proposed Complete Streets policies also contribute to equitable mobility, and would entail smaller street improvement projects in limited areas where the Complete Streets program is implemented. No significant impacts are anticipated.</p>
<p>Section 7.7, Capital Facilities</p>	
<p>Infrastructure Lifespan and Changing Conditions <i>Does the Comprehensive Plan consider the potential impacts of changing conditions on infrastructure lifespan?</i></p>	<p>The proposed Capital Facilities Element supports resilient capital facilities and consideration of the potential impacts of future climate conditions. These policies would have a positive impact on the lifespan of infrastructure by ensuring that climate change factors are considered in operation and maintenance and as such would likely limit environmental impacts that could occur because of infrastructure failure, such as a reduction in available service, or reduced capacity to respond to emergencies.</p>
<p>Section 7.8, Utilities</p>	
<p>Utilities <i>Does the Comprehensive Plan consider the impacts of utilities on preserving rural character?</i></p>	<p>Existing and proposed policies support minimizing impacts to the rural character, shorelines, and natural environment of the County. No significant impacts are anticipated.</p>
<p>Utilities <i>Does the Comprehensive Plan promote energy efficiency and reduction of environmental impacts?</i></p>	<p>Existing and proposed policies seek to reduce carbon emissions by increasing reliance on electricity if it comes from clean, renewable sources, and is used as efficiently as possible. New proposed language regarding energy efficiency is included (8.5.B. Goal 6, Policy 6). Policies are added to support continued propane use, a relatively clean-burning fossil fuel. Overall, no significant impacts are anticipated.</p>

Key Issues	Potential Impacts
Section 7.9, Historic and Archaeological Preservation	
<i>Do policies support effective historic preservation in San Juan County?</i>	Policy language in the draft Historic and Archaeological Preservation Element seeks to protect and preserve historic, cultural, and archaeological resources in San Juan County. No significant negative impacts of these policies are anticipated.
Section 7.10, Economic Development	
Economic Diversity and Vitality <i>Do the proposed economic development policies and actions promote desired economic diversity and vitality?</i>	Overall, the proposed policies and actions are likely to have a positive effect by encouraging locally focused long-term growth while promoting sustainable practices to protect and preserve natural assets. The impacts of these policies are likely be positive, because these actions would reduce the need for workers to travel for better paying jobs.
Supporting Local Workforce <i>Do the proposed economic development policies and actions promote sourcing jobs and labor locally?</i>	The impacts of nurturing a local workforce are likely to be positive, because these actions would reduce the need for residents and workers to travel.
Infrastructure and Community Assets <i>Do the proposed economic development policies and actions promote improvement to infrastructure and community assets in harmony with the County’s natural resources?</i>	The environmental impacts of these policies will depend on how they are implemented but would likely result in environmental benefits by promoting protection and preservation of environmental resources while maintaining infrastructure and community assets. No significant impacts are anticipated, although individual projects, such as energy generation and storage, providing barge access, or employing pervious paving systems, may have environmental impacts that would need to be addressed in the design and permitting process.
Economic Resilience <i>Do the proposed economic development policies and actions seek to enhance economic resilience to natural and economic disruptions?</i>	The proposed Economic Development Element frames environmental issues, such as food security, the negative effects of climate change, and more as core components of economic resilience, which are likely to have a positive effect. No significant impacts are anticipated, although individual projects to ensure resilience, such as energy generation and storage, or affordable clustered or multifamily developments, may have environmental impacts that would need to be addressed in the design and permitting process.

SECTION 4. PROPOSAL OVERVIEW

This section provides a description of the proposal, a review of the planning and policy framework that guides the proposal, and an overview of the guidance for the SEPA environmental review process.

4.1 Description of the Proposal

The proposal is the 2036 update of the San Juan County Comprehensive Plan (Plan Update) in accordance with the requirements of the Growth Management Act (GMA). In general, the Plan Update revises and refines the current GMA Comprehensive Plan policy direction to reflect changed conditions since prior planning adoption. The County's Comprehensive Plan (Comprehensive Plan) was adopted in 1998 and has been reviewed and amended on a periodic basis in response to community members' requests for amendments and to address changed requirements or conditions. The Plan Update is a major update to the Comprehensive Plan and includes updated growth targets, County-initiated policy and text amendments, and updated state and regional guidance as well as changed local conditions.

4.1.a Updated Growth Targets

The Plan Update is required by GMA to accommodate the forecasted population and employment in the County through 2036. The County's growth targets are the result of a multi-jurisdictional, regional process that establishes how each county plans to accommodate its fair share of future regional growth. The growth allocations that result from this process are documented in the San Juan County Countywide Planning Policies (CPPs).³

Based on available countywide data, the San Juan County population is projected to increase to 19,423 persons by the year 2036, an increase of 3,109 from the 2016 population. Countywide employment is projected to increase by only 473 new jobs by the year 2036, in proportion with the population.⁴

4.1.b Policy and Text Amendments

Proposed revisions in the Plan Update reflect current state and regional guidance; capture evolving County policy since the last updates of each element; increase readability, clarify direction, and remove redundancies; and add new or updated information since the last major update. Proposed policy amendments are more specifically described in Section 7, *Environmental Issue Papers*.

4.1.b.1 Comprehensive Plan Official Maps Amendments

The County received 28 requests for changes to the Comprehensive Plan Official Maps. Of these, ten were recommended for approval. In addition, following a request by one property owner to be included in the Mineral Resource Overlay District, the Department has recommended a group of ten parcels for inclusion in that overlay (see **Figure 4-1, Map Showing Locations of Recommended Changes to Land Use Designations**, and **Figure 4-1a, Legend for Figure 4-1**). Refer to the issue paper discussion in Section 7.3, *Land Use and Rural*.

³ San Juan County, *San Juan County Code* (December 7, 2021), accessed June 2022, www.codepublishing.com/WA/SanJuanCounty/.

⁴ San Juan County, *San Juan County Comprehensive Plan* (December 20, 1998, April 27, 2010), Appendix 1, Population Projections and Land Capacity Analysis (June 9, 2009, revised March 18, 2022), accessed June 2022, www.sanjuanco.com/510/Comprehensive-Plan.

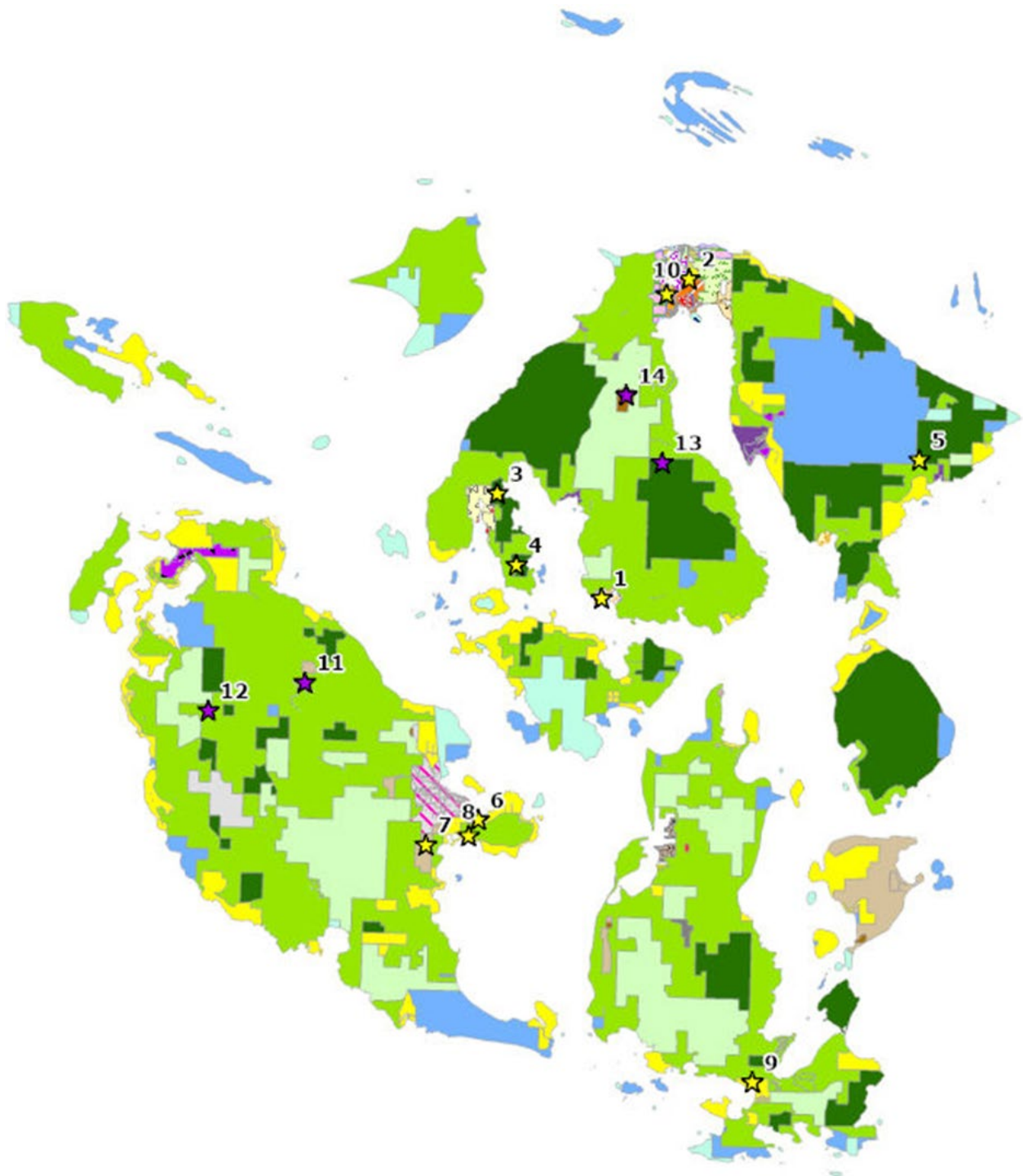


Figure 4-1
Map Showing Recommended Changes to Official Comprehensive Plan Maps

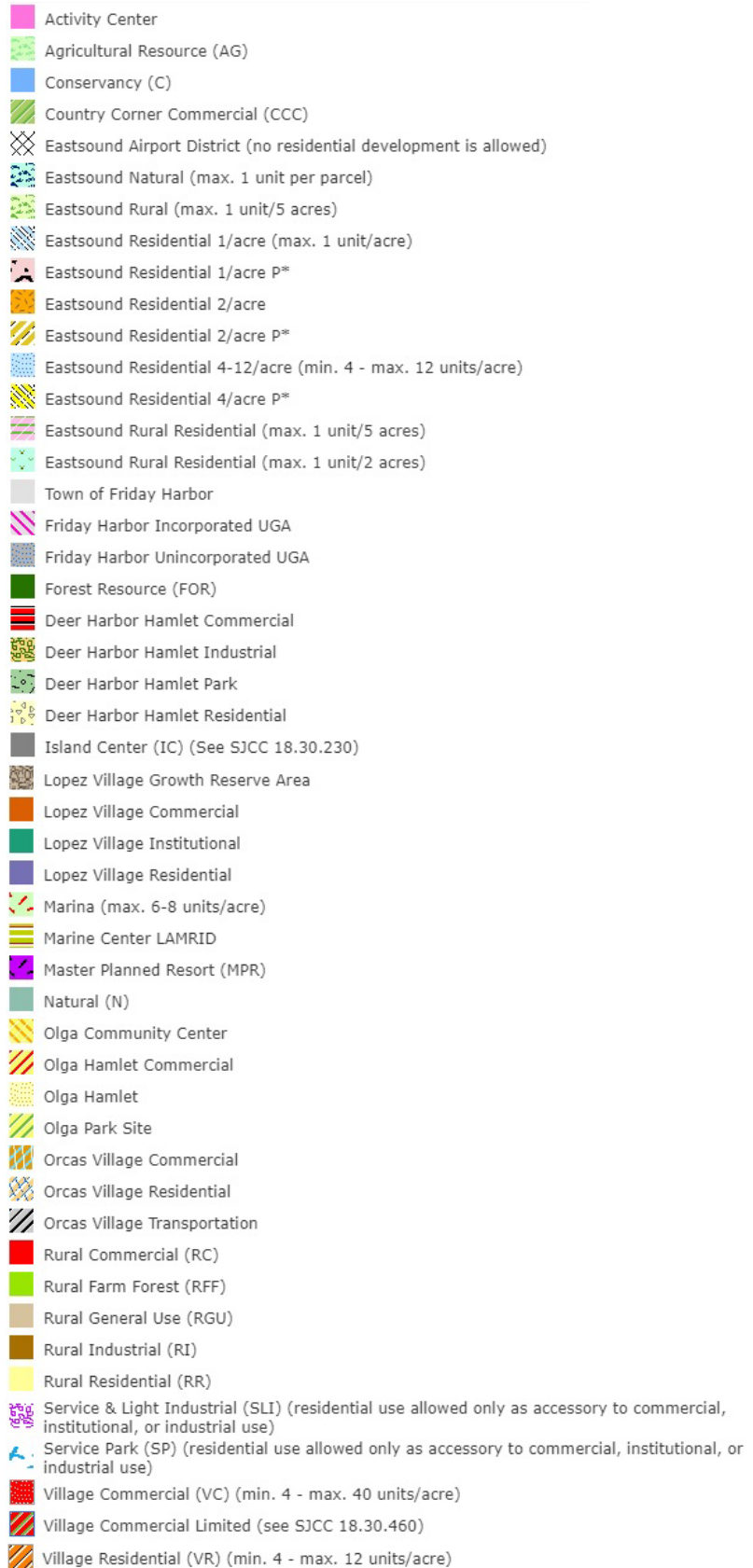


Figure 4-1a
Legend for Figure 4-1

4.1.b.2 Planning Framework

The Comprehensive Plan is prepared and updated within a framework of state and regional guidance. The following provides a brief summary of the Comprehensive Plan and guidance provided by the GMA and CPPs.

4.1.b.3 San Juan County Comprehensive Plan

The Comprehensive Plan is a broad statement of community goals and policies that direct the orderly and coordinated physical development of the County. The Comprehensive Plan serves as a guideline for designating land uses, infrastructure development, and community services, and provides specific guidance for future legislative and administrative actions. The Comprehensive Plan reflects community involvement, technical analysis, and the judgment of decision-makers.

Since adoption, the focus of the Comprehensive Plan has been on preserving and enhancing the rural character of the islands, a healthy land and the marine environment, and a vibrant and creative community. The Comprehensive Plan is organized into the following sections and elements chapters:

Section	Element	Title	Last Updated
A		Introduction	2010
B	1	Governance	2001
B	2	Land Use	2019
B	3	Shoreline Master Program	2017
B	4	Water Resources	2010
B	5	Housing	2009
B	6	Transportation	2016
B	7	Capital Facilities	2009
B	8	Utilities	2006
B	9	Historic and Archeological Preservation	1998
B	10	Economic Development	2014
C		Definitions	1998
D		Administration	2006

The Comprehensive Plan also contains a number of appendices providing details and analysis to support the plan. Of those, the following are being updated:

- Appendix 1, Population Projections and Land Capacity Analysis ([March 2022 update](#))
- Appendix 5, Housing Needs Assessment ([2021 update](#))
- Appendix 6, Transportation ([September 2020 update](#))
- Appendix 7, Capital Facilities Plan ([December 2020 update](#))
- Appendix 8, Utilities Inventory and Existing Conditions ([April 2020 update](#))

Discussion

The Comprehensive Plan is designed to minimize environmental impacts on the natural and built environment that could result from future growth and development. The general County goals promote the overall quality of life, emphasize aesthetics and health, and promote land use compatibility, among other goals. The general County goals also incorporate by reference relevant functional plans into the Comprehensive Plan.

In the Plan Update, amended goals and policies and new goals and policies continue to focus on measures that eliminate or minimize the potential impacts of growth on the natural and built environments. See the discussion in Section 7, *Environmental Issue Papers*, for a review of policies in each of the elements.

4.1.b.4 Washington Growth Management Act

The Washington State Legislature adopted the GMA in 1990 per Revised Code of Washington (RCW) 36.70A. The GMA contains a comprehensive framework for managing growth and coordinating land use with infrastructure. The GMA contains broad planning goals to guide local jurisdictions in determining their vision for the future and in developing plans, regulations, programs, and budgets to implement that vision. The goals discourage sprawling development, encourage development in urban areas with adequate public facilities, encourage economic development throughout the state consistent with comprehensive plans, encourage efficient multimodal transportation systems, provide for the protection of property rights, and require that adequate public facilities and services necessary to support development be available when new development is ready for occupancy. The goals are not ranked in any order but can be balanced by the jurisdiction.

A fundamental requirement of the GMA is early and continuous public participation in the development and amendment of plans and development regulations. Public participation procedures that are described in the procedural rules (Washington Administrative Code [WAC] 365-195-600) include the broad dissemination of proposals and alternatives, opportunity for written comment, public meetings after effective notice, provision for open discussion, communication programs, information services, and consideration of and response to public comments.

A central concept of the GMA is that comprehensive plans must be internally and externally consistent. Internally, each GMA comprehensive plan must demonstrate that the Land Use Element, Capital Facilities Element, and Financing Plan are consistent. If funding is not available to support the proposed land use pattern and maintain adopted level of service standards for public facilities and services, the jurisdiction is required to reassess the land use pattern and/or the level of service standards until balance is reached. Externally, local comprehensive plans are required to be consistent with the comprehensive plans of other jurisdictions with common borders or related regional issues. Standards for transportation level of service should be regionally coordinated.

To ensure consistency with GMA requirements, each county or city that is preparing a comprehensive plan or implementing development regulations is required to submit the proposed plan or regulations to the state for review and comment before final adoption.

Discussion

As proposed, the Plan Update would comply with the goals of the GMA that seek to focus growth in urban areas with adequate services, provide for environmental protection, encourage economic

development, support efficient transportation systems, protect private property rights, and require that adequate public services are available concurrent with new development.

As required by the GMA, the County has conducted a comprehensive public involvement program for this update, described below in Section 4.1.b.7, *Community Engagement*. The proposal would extend the Comprehensive Plan planning horizon to 2036, consistent with GMA requirements. The proposal would also amend Comprehensive Plan policies to incorporate several changes that are recommended and/or required by GMA. As required by GMA, the County will submit the Plan Update to the state for review and comment prior to final adoption.

4.1.b.5 San Juan County Countywide Planning Policies

GMA requires that counties adopt countywide planning policies to provide an agreed-upon framework, within which cities and counties can develop comprehensive plans (RCW 36.70A.210). The purpose of these policies is to express a regional vision and help measure consistency of local plans.

Discussion

San Juan County and its communities have been working collaboratively to update population and employment targets through 2036. The Plan Update provides capacity to accommodate growth under the updated growth targets. Goals and policies in the Plan Update have considered and are consistent with these growth targets. Proposed policy amendments are described in Section 7, *Environmental Issue Papers*.

4.1.b.6 Environmental Review

The purpose of this environmental document is to assist the public and decision-makers in considering the environmental impacts of the Plan Update on the built and natural environments.

SEPA/GMA Integration

WAC 197-11-210 authorizes jurisdictions planning under the GMA to integrate the requirements of the State Environmental Policy Act (SEPA) (RCW 43.21C) and GMA during comprehensive plan updates. The goal is to ensure that environmental analysis under SEPA occurs as an integral part of the planning and decision-making process under GMA. Analysis of environmental impacts during the planning process can result in better-informed planning decisions as well as avoid delays and duplication.

WAC 197-11-228 states that the appropriate scope and level of detail of environmental review should be tailored to the GMA action under consideration; jurisdictions may modify phased review under SEPA as necessary to track the phasing of GMA actions; and the process of integrating SEPA and GMA should begin at the early stages of plan development.

San Juan County has elected to follow an integrated SEPA/GMA process for the Plan Update SEPA document. Integration of the environmental analysis with the planning process informs future decisions in refining the Plan Update.

Non-Project Environmental Analysis

SEPA requires government officials to consider the environmental consequences of actions they are about to take and seek better or less impacting ways to accomplish those proposed actions. The adoption of comprehensive plans or other long-range planning activities is classified by SEPA as a **non-project, or programmatic, action**. A non-project action is defined as an action that is broader than a single site-specific project, and involves decisions on policies, plans, or programs. SEPA establishes that

environmental analysis for a non-project proposal may address potential impacts at a level of detail appropriate to the scope and level of planning for the proposal. This environmental document analyzes potential environmental impacts as appropriate to the general nature of this non-project proposal.

Scope of Analysis

As established in WAC 197-11-235, there is no standard format for an integrated GMA document. The environmental analysis in this document has been organized as a series of issue papers that correspond to the general County-wide elements contained in the proposed Plan Update. While each issue paper corresponds to a Comprehensive Plan Element, issue papers also discuss other elements that may be impacted by the changes proposed to that element.

4.1.b.7 Community Engagement

Public participation is a fundamental goal of the GMA and is central to the Plan Update. Public engagement provides important opportunities for the community to help shape the plan, to learn more about the County, and to build community connections. Recognizing the importance of this goal, WAC 365-196-600 establishes that jurisdictions planning under the GMA must establish procedures for early and continuous public participation in the development and amendment of comprehensive plans and development regulations.

The following summarizes key events and activities that San Juan County has undertaken to promote community engagement in the Plan Update:

- **Vision Workshops.** Starting in fall 2017, the County kicked-off a visioning process with three days of one-on-one orientation interviews, as well as pop-up studios and accompanying evening workshops. The County also sponsored an online survey designed specifically to expand the review of the current vision and vet workshop results, allowing those who may not have attended the studios and workshops to contribute their voices to the process, too.
- **Community Workshops.** The Department of Community Development conducted five community workshops and an online survey in fall 2018. The content of the community workshops and online survey was designed to begin education and conversations about issues that the County Council and Planning Commission identified at the August 6, 2018, County Council and August 17, 2018, Planning Commission meetings.
- **Community Conversations and Pop-up Events.** In fall 2021, the County hosted daytime “pop-up” events on San Juan, Orcas, and Lopez Islands and evening open houses following each daytime event to reignite the community conversation about the Plan Update.
- **Website.** The County’s Plan Update website provides background information and resources, and updates, including the current and past drafts of Plan elements (<https://www.sanjuanco.com/1753/Comp-Plan-Update-Current-Drafts>).

SECTION 5. PART B: ENVIRONMENTAL ELEMENTS

As described in Section 4, *Proposal Overview*, the proposed Comprehensive Plan Update is a GMA action and environmental review is being conducted in an integrated SEPA/GMA document. Environmental documentation contained in the Proposal Overview, Parts A and D of this Environmental Checklist, and the issue papers provide the basis for the County's threshold determination. Part B is not required to be completed in an integrated SEPA/GMA document [WAC 197-11-235(3)(b)] and is not included in this document.

SECTION 6. PART D: SUPPLEMENTAL SHEET FOR NON-PROJECT ACTIONS

Additional details and analysis about impacts discussed in this section are provided in Section 7, *Environmental Issue Papers*.

6.1 How would the proposal be likely to increase discharge to water; emissions to air production, storage, or release of toxic or hazardous substances; or production of noise?

As a non-project action, the proposal would not directly impact water, air quality, or noise, or increase releases of hazardous substances. However, project-level development envisioned by the Comprehensive Plan could result in such impacts. Future project-specific development proposals such as road and utility projects or housing development within the County could result in impacts such as accidental spills or construction-related sediment releases to water, emissions to air from vehicles or heating equipment, or noise from construction or other machinery. Impacts from specific projects would be reviewed consistent with the applicable provisions of the San Juan County Code and San Juan County SEPA procedures.

6.1.a Proposed measures to avoid or reduce such increases are:

The Comprehensive Plan provides a policy framework that is intended to protect water, air quality, noise impacts and release of hazardous substances, described below:

Water. Proposed policy guidance in the Water Resources Element carries forward and expands upon the direction established in the 1998 Comprehensive Plan, with guidance related to resource protection for all water types, including groundwater, stormwater, and surface water. The proposed goals and policies add climate change as a consideration for water availability, highlight specific concern around seawater intrusion and instream flows, and encourage education and incentives for best practices through monitoring and water use efficiency measures. Existing critical areas regulations also protect all areas of the County as critical aquifer recharge area; therefore, protection of water resources would continue.

Air. As described in the Land Use and Rural Element, the land use concept established on the Comprehensive Plan Official Maps aims to maintain and improve the quality of air through appropriate control of density. The Transportation Element also provides direction to support all modes of travel, in part to reduce reliance on vehicular travel that generates air emissions. It also includes proposed policies supporting the use of electric vehicles to reduce greenhouse gas (GHG) emissions.

Proposed policy changes focus on reducing air pollution from development by establishing landscaping standards that provide functional environmental benefits such as improved air quality, carbon sequestration, temperature regulation, and stormwater management; and establishing standards that minimize air and water pollution by controlling stormwater runoff and emissions of air pollution.

In the Land Use and Rural Element under Section 2.2.O, Climate Change, proposed policies also seek to reduce GHG emissions by incentivizing green building rating system certifications, reducing natural resource waste, decreasing emissions from transporting building materials, promoting design of developments and infrastructure for disassembly and reuse or recycling, and promoting stewardship activities that result in increased carbon sequestration.

Toxic or Hazardous Substances. Existing goals and policies in the Land Use and Rural Element seek to protect the quality and quantity of groundwater by regulating underground hazardous materials storage tanks, facilities which use or store hazardous materials and wastes, large on-site sewage disposal systems, petroleum pipelines, landfills, and surface mining operations, and establishing performance standards for waste disposal in the Rural General Use, Rural-Farm Forest, and Rural Industrial designation.

Noise. Existing goals and policies in the Transportation Element seek to minimize noise generated by transportation facilities and travel modes associated with them. These goals aim to:

- Foster recognition by pilots and other airport users of their roles in minimizing air traffic safety hazards, noise, and other immediate impacts of airport activities on surrounding land uses. Cooperate with the port districts, and solicit participation from airport operators, owners, users and the general public in anticipating and responding to land use, safety and noise concerns
- Encourage consideration of the effects of noise, light, vibration, and fumes, and the perception of low-flying aircraft
- Consider flight patterns with regard to noise and navigation impacts in granting shoreline permits for docks for seaplane use associated with residential or commercial use

In addition, existing goals and policies in the Land Use and Rural Element seek to establish performance standards for noise in Rural General Use, Rural-Farm Forest, and Rural Industrial land use designations.

6.2 How would the proposal be likely to affect plants, animals, fish, or marine life?

As a non-project action, the proposal would not directly impact plants, animals, fish, or marine life. However, project-level development envisioned by the Comprehensive Plan, such as providing barge landings, or clearing land for housing development, could impact plants, animals, fish, or marine life. Future project specific development proposals within the County that may result in these impacts would be reviewed consistent with the applicable provisions of the San Juan County Code and SEPA procedures.

6.2.a Proposed measures to protect or conserve plants, animals, fish, or marine life are:

Existing critical areas regulations protect and preserve critical marine and terrestrial wildlife habitats and wildlife corridors, including breeding grounds, resting and feeding areas for migratory birds, nursery areas, and habitats of threatened, endangered and sensitive species.

Existing policies in the Watershed Management section of the Land Use and Rural Element also seek to identify critical marine habitats, and encourage reclamation, rehabilitation and enhancement of wetlands, marine and terrestrial wildlife habitat, and vegetated areas necessary to maintain site stability and groundwater recharge.

Proposed policies include encouraging agricultural best management practices to protect wetland functions, fisheries, and wildlife through incentives, education, and promotion of programs such as the Voluntary Stewardship Program.

Within the Resource Lands section, an existing goal is to protect and conserve forest lands while maintaining fish and wildlife habitat. A proposed goal would be added to protect forest lands that provide significant ecosystem services including improving wildlife habitat and connectivity for upland species.

A new policy in the General Rural Goals and Policies Section also seeks to establish standards that protect wildlife habitat in rural lands.

6.3 How would the proposal be likely to deplete energy or natural resources?

As a non-project action, the proposal would not deplete energy or natural resources. However, project-specific development proposals, such as housing, commercial development, or new government facilities within the County may result in increased energy and resource consumption. Construction and operation of buildings uses energy, and construction of buildings and roads consume natural resources such as rock and lumber. Any specific project would be reviewed for consistency with the San Juan County SEPA procedures, Building Code, and requirements of the applicable utility service provider.

6.3.a Proposed measures to protect or conserve energy and natural resources are:

Any new building would have to comply with the state Energy Code, which requires higher efficiency appliances and energy conservation measures. In addition, the Comprehensive Plan includes both existing and proposed policies that will protect and improve conservation of energy and natural resources.

The Land Use and Rural Element seeks to conserve agricultural, forest and mineral resource lands of long-term commercial significance. The element has three primary land use categories, one of which is natural resources. The Mineral Resource section includes new policies to help ensure long-term viability of existing mineral extraction sites. The Natural Resource Conservation section includes existing and proposed goals and policies focused on preserving nonrenewable natural resources and conserving renewable natural resources. A new proposed policy in the Climate Change section seeks to reduce waste of natural resources, and a new policy in Resource Lands seeks to preserve natural resource lands for their social, economic, and environmental benefits. The Energy section of the Land Use and Rural Element includes existing policies that seek to conserve energy and promote energy efficiency. A new policy under Climate Change seeks to incorporate energy-efficiency principles into publicly funded developments.

The Utilities Element includes proposed language about promoting solar projects in the County. Proposed policies in this element promote increasing energy efficiency of buildings and systems.

6.4 How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

As a non-project action, the proposal would not directly impact or affect environmentally sensitive areas or areas designated for government protection. However, project-level development envisioned by the Comprehensive Plan, such housing, commercial development, or road improvements, could impact or affect environmentally sensitive areas or other areas designated for government protection. Future project-specific development proposals within the County that may result in these impacts would be reviewed for consistency with the applicable provisions of the San Juan County Code and SEPA procedures.

6.4.a Proposed measures to protect such resources or to avoid or reduce impacts are:

As stated in Section 6.2.a, existing critical areas and shoreline regulations protect and preserve wetlands, critical marine and terrestrial wildlife habitats and wildlife corridors, including breeding grounds, resting and feeding areas for migratory birds, nursery areas, and habitats of threatened, endangered and sensitive species.

The Land Use and Rural Element includes goals and policies to protect Critical Areas. The General Goals and Policies section includes guidance for the orderly use of the County's land, shorelines, and water areas. A new proposed policy seeks to establish a shoreline environment designation, policies, boundaries, and provisions regarding the identification, siting and design of essential public facilities located in the shoreline jurisdiction. Policies in the Fish and Wildlife Habitat Conservation Areas section seeks to protect and restore habitat for salmon listed as endangered, threatened, or sensitive.

Many existing and proposed goals and policies seek to protect agricultural and forest resource lands, such as controlling density of development on prime farmland, including innovative zoning techniques and accessory uses listed in RCW 36.70A.177.

The Historic and Archaeological Preservation Element retains and clarifies policies to identify, protect, and preserve the historic and cultural resources of San Juan County.

6.5 How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

As a non-project action, the proposal would not directly impact or change land and shoreline uses. The proposed changes do not alter any goals or policies for shorelines, but some changes to the Comprehensive Plan Official Maps would increase the allowable density in a few non-shoreline areas of the County. The proposed increases in allowable density are modest in scale and only apply to a few parcels, most of which are in urban growth areas, or are being added to adjacent urban growth areas. The few parcels that are not in or near urban growth areas are parcels which were found not to comport with stricter forest designations and therefore would be allowed densities consistent with other rural residential areas. Project-level development, including both more intensive development allowed because of changes in designations, as well as other housing or commercial development envisioned by the Comprehensive Plan, could affect land and shoreline use. Future project specific development proposals would be reviewed for consistency with the applicable provisions of the San Juan County Code and SEPA procedures.

6.5.a Proposed measures to avoid or reduce shoreline and land use impacts are:

The San Juan County Unified Development Code (Title 18) regulates the location and character of land and shoreline use under County jurisdiction. Title 18 was developed consistent with the adopted Comprehensive Plan. The proposed Plan Update continues established land use policies for San Juan County, with refinements and adjustments that are not expected to allow any new incompatible uses. In general, the update revises and refines current Comprehensive Plan policy direction to address GMA requirements, reflects changed conditions and evolving policy since adoption of the prior plan, and accommodates population and employment growth through 2036.

The Land Use and Rural Element forms the basis of the County's land use strategy. It establishes the desired character, quality, and patterns of development, and use goals, policies and

Comprehensive Plan Official Maps guide how the County manages growth and development. The Plan reduces development pressures and patterns of sprawl within rural areas mainly by restricting allowable residential density and uses; conserves agricultural, forest and mineral resource lands of long-term commercial significance through development regulations; and preserves and protects open space, scenic and cultural resources through a combination of regulations and incentives.

6.6 How would the proposal be likely to increase demands on transportation or public services and utilities?

As a non-project action, the proposal would not directly increase demands on transportation or public services and utilities. However, population growth and development envisioned by the Comprehensive Plan is expected to increase motorized and non-motorized travel demand in the County. Project-level development may result in an increased demand for public services and utilities. Future project specific development proposals within the county that may result in these impacts would be reviewed consistent with the applicable provisions of the San Juan County Code and SEPA procedures. Transportation demand is also expected to increase because of growing tourism, with or without new projects in the County.

6.6.a Proposed measures to reduce or respond to such demand(s) are:

Existing and amended policies in the Transportation Element support a multi-modal transportation system focused on increasing mobility and improving safety for vehicles, ferries, transit, bike/moped travel, boats, and pedestrians. Although traffic volumes would increase, the updated Transportation Element indicates that all roads and intersections would operate at a level of service (LOS) D or better through 2036, meaning there would be no roads at an unacceptable LOS. Existing policies establish a range of responses should any roadway fall below the LOS D level. Proposed policies related to climate change resilience could increase projects for road maintenance, flood and erosion control, and could include relocation of some facilities. New policies also support measures to reduce GHG emissions.

Proposed goals and policies in the Capital Facilities Element seek to anticipate the need for public facilities through periodic review of service demands.

Proposed goals and policies in the Utilities Element aim to facilitate coordinated, cost-effective provision of services, planning, and construction by utility service providers in a manner consistent with the goals and policies of other elements of the Comprehensive Plan.

6.7 Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

In general, the proposal seeks to protect the environment, so no conflicts with local, state or federal laws for the protection of the environment are anticipated. As described in Section 4, *Proposal Overview*, the County's current Comprehensive Plan is designed to minimize environmental impacts to the natural and built environment that could result from future growth and development that is expected to occur. In the proposed Plan Update, existing goals and policies that are carried forward, amended goals and policies, and new goals and policies continue to focus on measures that eliminate or minimize the potential impacts of growth on the natural and built environment.

SECTION 7. ENVIRONMENTAL ISSUE PAPERS

7.1 Introduction to the Issue Papers

The County is using an integrated and iterative approach to conducting environmental review and amending the Comprehensive Plan. This approach is intended to help identify potential environmental issues early in the public review process, concurrent with considerations of possible policy changes. The issue papers contained in this section review existing and proposed policy changes and expand upon the SEPA Environmental Checklist, Part D, Supplemental Sheet for Non-Project Actions. Each issue paper begins with a summary table that highlights emerging issues and related SEPA implications, followed by a brief discussion of these issues. While each issue paper corresponds to a Comprehensive Plan Element, issue papers also discuss other elements that may be impacted by the changes proposed to that element. The issue papers corresponding to each element are the following, and discussed in detail below:

- Governance
- Land Use and Rural
- Water Resources
- Housing
- Transportation
- Capital Facilities
- Utilities
- Historic and Archaeological Preservation
- Economic Development

7.2 Governance

7.2.a Introduction

The purpose of the Governance Element is to set policies for government conduct, provision of services, and management of public programs. The Governance Element includes one goal and ten policies that guide County government from a high level and support the Comprehensive Plan vision.

Table 7-1 Key Governance Issues

Key Issues	Potential Impacts
Governance	
Governance <i>Do policies provide a framework for public decision-making in San Juan County?</i>	Additional policy guidance seeks to integrate climate change as a consideration in the County's regulatory decision-making. The environmental impact of this policy would likely be positive.

7.2.b Proposed Policies and Potential Impacts

7.2.b.1 Governance

The Governance Element was adopted in 1998. Two changes are proposed. One proposed change is to delete existing Policy 10 because it was never implemented, *“Within three years of the effective date of this Plan, conduct public hearings regarding equitable redistricting, which could lead to a call for an election of a board of freeholders.”* The other proposed change is to create a new Policy 10 about climate change planning, *“Consider climate change resilience and mitigation planning a high priority when amending County goals, policies, and regulations.”*

The deletion of the old Policy 10 is administrative and would not affect the environment. The proposed new policy would encourage the County to consider climate change at a regulatory level, which would likely have positive impacts on the environment. Climate change mitigation planning generally requires measures to reduce greenhouse gas emissions, a benefit to air quality that would not adversely affect other elements. Climate change resilience planning involves avoiding or reducing the potential for environmental risks such as sea level rise, saltwater intrusion, and wildfire. Resilience efforts could involve rebuilding or building new infrastructure but can generally be accomplished without significant impacts to the environment. No significant impacts are anticipated.

7.3 Land Use and Rural

7.3.a Introduction

The proposed changes to the Land Use and Rural Element include revisions to existing policies and goals. All changes were reviewed for this analysis. Many changes are to improve clarity and do not change the substance of the policies. This issue paper assesses the potential impacts from any substantive changes to the Element. It does not list every change line-by-line but summarizes the general themes and changes in the Element.

The draft Land Use and Rural Element is generally consistent with the direction of the 1998 Comprehensive Plan. However, new language was added based on GMA requirements, including the addition of land use categories. Changes include the creation of a separate Rural Lands section, new goal areas for Agriculture and Climate Change, and changes to criteria in the Urban Growth Areas section. Changes were also made to clarify language, to ensure consistency with other planning documents, and to revise the Official Comprehensive Plan Maps where appropriate.

The environmental impacts of projects developed under the policy framework provided by the draft Land Use and Rural Element would be minor. Policy language in the draft Land Use and Rural Element is designed to mitigate potential adverse environmental impacts. The San Juan County Code also includes regulations to control the environmental impacts associated with land use and development. The key issues and potential impacts for land use are summarized in **Table 7-2**.

7.3.b Proposed Policies, Impacts, and Mitigation

7.3.b.1 Land Use

Residential Land Capacity

The GMA requires the County to ensure that the Comprehensive Plan and its implementing development regulations provide enough capacity of land suitable for development to accommodate the projected housing and employment growth (RCW 36.70A.115). The Land Capacity Analysis (LCA) (refer to Comprehensive Plan Appendix 1)⁵ analyzed the amount of capacity provided by the development regulations and Comprehensive Plan designations and densities to accommodate future growth through the year 2036.

San Juan County's 2016 population was 16,314. The 2036 population is projected to increase to 19,423, an increase of 3,109. San Juan and Orcas Islands are projected to experience the most population growth, more than 1,000 residents each. Of the ferry-served islands, Lopez and Shaw are projected to have the least population growth in this period.

The County's average household size is 2.04 people per household. At this rate, the number of households will increase from 7,997 to 9,521 by 2036, an increase of 1,524 households. The Housing Needs Assessment indicates there were 13,859 dwelling units (du) in the County in 2016.⁶ If du continue

⁵ San Juan County, *San Juan County Comprehensive Plan* (December 20, 1998, April 27, 2010), Appendix 1, Population Projections and Land Capacity Analysis (June 9, 2009, revised March 18, 2022), accessed June 2022, www.sanjuanco.com/510/Comprehensive-Plan.

⁶ San Juan County, *San Juan County Comprehensive Plan* (December 20, 1998, April 27, 2010), Appendix 5, Housing Needs Assessment (March 28, 2019, revised January 8, 2021), accessed June 2022, www.sanjuanco.com/510/Comprehensive-Plan.

to grow at an average annual rate of 209 per year (the rate between 1980 and 2016), a total of 18,039 du would be expected by 2036. This is an increase of 4,180 du over 2016 levels.

Table 7-2 Key Land Use and Rural Issues

Key Issues	Potential Impacts
Land Use and Rural	
<p>Residential Land Capacity <i>Is the supply of vacant and redevelopable land sufficient to accommodate the 20-year planned population/housing growth?</i></p>	<p>With the proposed changes, the supply of vacant and redevelopable land is sufficient to accommodate 2036 projections for planned population/housing growth. No significant impacts would occur.</p>
<p>Employment Land Capacity <i>Is the supply of vacant and redevelopable land sufficient to accommodate the 20-year planned employment growth?</i></p>	<p>There is sufficient capacity to accommodate the projected employment growth.</p>
<p>Land Use Compatibility <i>Do planned land uses impact compatibility?</i></p>	<p>Proposed amendments to the Comprehensive Plan Official Maps would not impact land use compatibility. No significant impacts would occur. Policy language in the draft Land Use and Rural Element and existing regulations in the County Code would help to mitigate any minor compatibility impacts associated with growth and development.</p>
<p>Resource Lands <i>Do planned land use patterns support protecting resource lands?</i></p>	<p>The proposed changes to goals and policies further promote the conservation and protection of agricultural resource lands, Forest Resource Land, and Mineral Resource Land. Significant adverse environmental impacts are not anticipated.</p>
<p>Community Character <i>Do planned land use patterns enhance community character?</i></p>	<p>The draft Land Use and Rural Element includes policy language to articulate the broad strategies the County will use to preserve the general character of unincorporated UGAs. No significant adverse environmental impacts are anticipated.</p>
<p>Rural Lands <i>Do the planned land use patterns protect and enhance rural lands?</i></p>	<p>The draft Land Use and Rural Element provides a definition for rural character, and establishes policies that allow rural development in designated rural lands while protecting rural character. No significant adverse environmental impacts are anticipated.</p>
<p>Climate Change <i>How is climate change considered related to land use patterns?</i></p>	<p>The draft Land Use and Rural Element includes climate change goals and policies with a framework to integrate climate change in land use planning. No significant adverse impacts of these policies are anticipated.</p>
<p>Agriculture <i>Do the policies and plan protect agricultural lands and support agriculture?</i></p>	<p>Proposed new goal and policy language focuses on protecting agricultural land and providing for uses that support economically viable agriculture. No significant adverse environmental impacts are anticipated.</p>

Estimated land capacity is the measure used to determine the County’s ability to accommodate its adopted targets. The LCA uses a combination of baseline information, land use assumptions, and growth factors to assign development to land that is undeveloped or is considered likely to redevelop. As part of the Plan Update, the County used an LCA and Housing Needs Assessment to analyze the amount of capacity provided by the development regulations and Comprehensive Plan designations and densities

to accommodate future growth through the year 2036. The LCA indicates that the County's existing land use designations, densities, and regulations provide adequate residential capacity after accounting for market and seasonal home factors. Countywide, there is final capacity for approximately 2,461 new du and an excess final capacity of 937 du countywide (2,461 du – 1,524 new du = 937 du excess capacity). Mixed-use development was considered in three separate scenarios, which showed that even with no development of residential uses in the mixed-use zones, there would still be adequate capacity for housing. The Comprehensive Plan recognizes that affordability of housing for all income levels remains a challenge and includes policies to ensure minimum densities for residential areas in most activity centers in the County as a means of promoting affordable options. The proposed policies would not limit capacity, but rather would expand it slightly; therefore, the Comprehensive Plan would not adversely affect the total housing supply or the distribution of housing availability. Some minor impacts could be expected with individual developments, which would be evaluated through the permitting process.

Employment Land Capacity

According to the LCA, there is sufficient employment capacity to accommodate the projected population growth. The analysis shows that the gross commercial employment capacity projected to be available in 2036 could accommodate between 12,869 and 19,062 jobs. Countywide employment is only projected to increase by 473 new jobs, in proportion with the population.

Land Use Compatibility

The County is proposing several changes to the Comprehensive Plan Official Maps. None of the changes are expected to significantly alter the overall land use pattern in the County or adversely affect land use compatibility. The County reviewed 28 requests for changes to the map and has recommended approval of eight, plus other actions on two additional requests. The County also recommended land use designation changes with residential density increases in two areas in the Eastsound UGA totaling 36 acres. The recommended changes to designations are listed in a memorandum to the San Juan County Planning Commission dated February 3, 2022.⁷ **Table 7-3** lists the recommended changes that are reviewed in this checklist, and **Figure 7-1** shows the location of each proposed change.

Of the ten proposed changes in land use designations, five would increase residential capacity. Of those, one would be a re-designation from a more intensive designation allowing commercial development to a less intensive one; therefore, impacts would likely be less than currently allowed. One would increase the allowable units by just 2 units, and no significant impacts are likely. The third requested change that would increase residential capacity would increase allowable residential density on two parcels in the Eastsound area by a total of 36 units. This increase would not create compatibility issues because adjacent land is similarly zoned and developed, and existing regulations provide setbacks, height limits, and other appropriate standards. Some impacts (such as traffic circulation) would occur, which would be addressed with a subdivision application, and further environmental review would be required.

Among the remaining requests for changes, two would expand the Friday Harbor UGA to encompass Port of Friday Harbor properties that are already zoned for and in some cases developed with urban uses. No direct impacts are expected. Additional environmental review would be required when

⁷ San Juan County, *Memorandum 2036 Comprehensive Plan Update Element B.2 Land Use and Rural, Official Maps Planning Commission Preliminary Recommendations* (February 3, 2022), accessed June 2022, https://www.sanjuanco.com/DocumentCenter/View/25126/2022-02-03_DCD_Memo_PC_Preliminary_LU_Change_List_For_02-11-22_PC.

annexation occurs, and with any larger developments in these areas. The remainder of the requests would adjust designations to match existing property conditions, and the changes would not directly affect the uses or density of uses expected on those properties. Therefore, no direct environmental impacts are expected.

Table 7-3 Recommended Changes to Official Comprehensive Plans Maps

Map ID #	Request Number	Parcel Number(s)	Request Summary	Recommendation	Potential Impacts
1	18-0007	262222012000	Re-designate the north 2 acres of TPN 262222012000 from Orcas Village Commercial (OVC) to Orcas Village Residential (OVR).	Re-designate the northern 3.5 acres to OVR.	Increases residential capacity but reduces commercial capacity. Residential development would likely be less intensive than commercial; thus, the new designation is not expected to produce greater incompatibilities.
2	18-0018	271144008000, 271144017000	Re-designate two developable parcels inside the Eastsound UGA from ER4P to Village Residential / Institutional (VRI). This increases the maximum density from 4 units per acre to 12 units per acre.	Re-designate parcels to VRI.	Increases residential capacity by 36 units on lots already designated for residential development, to the same density as lots to the south. Additional environmental review could be accomplished for subdivisions to ensure compatibility with adjacent uses.
3	18-0019	260711002000, 260643002000, 260643009000, 260643008000	Re-designate four parcels (30 acres) Forest Resource Land (FOR) (1 du/20 acres) and change them to Rural Farm Forest (RFF) (1 du/5 acres) on Orcas Island.	Re-designate the subject parcels but do not increase the maximum residential density.	Change recognizes that these parcels do not meet Comprehensive Plan criteria for Forest Resource designation. No significant loss of commercial forest land is expected, and allowable residential density would not increase substantially due to small existing parcel size.
4	20-0004	261723001000, 261723002000, 261732001000, 261734001000	Re-designate three parcels from FOR to RFF on Orcas Island.	Re-designate the subject parcels but do not increase the maximum residential density.	No change in land use. Recognizes existing land use on property.

Table 7-3 Recommended Changes to Official Comprehensive Plans Maps

Map ID #	Request Number	Parcel Number(s)	Request Summary	Recommendation	Potential Impacts
5	20-0002	173533001000	Re-designate from FOR to RFF on Orcas Island.	Re-designate this 5-acre parcel and the four similar ones to the south of it from FOR to RFF.	Change recognizes that these parcels do not meet Comprehensive Plan criteria for Forest Resource designation. No significant loss of commercial forest land is expected, and allowable residential density would not increase due to small existing parcel size.
6	n/a	351341005000, 351341006000, 351341008000, 351313004000, 351342001000	Add five parcels totaling 14 acres around Jensen Marina to the Friday Harbor UGA.	Add parcels to the Friday Harbor UGA.	Property includes existing marina parcels and three adjacent single-family-developed parcels. No change in land use or land use intensity is expected from including these in the UGA. Further environmental review would be conducted before annexation.
7	n/a	14 parcels	Add 14 parcels totaling 52.75 acres surrounding the Friday Harbor Airport to the Friday Harbor UGA.	Add parcels to the Friday Harbor UGA.	Property includes land within and adjacent to the Friday Harbor Airport. Some urban uses already exist on these properties, and existing zoning would allow them to intensify. No change in land use or land use intensity is expected from including these in the UGA. Further environmental review would be conducted before annexation.
8	21-0002	352412001000	Change land use designation from Rural Residential (RR) to Rural Industrial (RI) on San Juan Island.	Change land use designation from RR to RI.	No change in land use expected. Recognizes existing land use on property and allows continued operation.
9	22-0001	141855001000, 141880005000	Change land use designation from Rural Residential (RR) to Rural Industrial (RI) on Lopez Island.	Change land use designation from RR to RI.	No change in land use expected. Recognizes existing land use on property and allows continued operation.

Table 7-3 Recommended Changes to Official Comprehensive Plans Maps

Map ID #	Request Number	Parcel Number(s)	Request Summary	Recommendation	Potential Impacts
	19-0005	263322001000	Re-designate parcel from Natural (N) to a rural designation on Shaw Island where school (primary or secondary) is an allowed use.	No change to Official Comprehensive Plan Maps, but change zoning to allow existing schools in rural land use designations.	No change in land use expected. Recognizes existing land use on property.
2	Eastsound Residential Density Increase Candidate Area 1	52 parcels on North Beach Rd and Mt. Baker Rd	Increase density of an approximately 24-acre area from 4 DU/ac to 12 DU/ac, and redesignate the area Village Residential/ Institutional	Increase density from 4 DU/ac to 12 DU/ac, and redesignate the area Village Residential/ Institutional	
10	Eastsound Residential Density Increase Candidate Area 2	271424001000 271424005000 271424006000 271424004000 271424009000 271424007000	Increase density and redesignate the 12-acre area from Eastsound Residential 1 DU/ ac to Eastsound Residential 4 DU/ac.	Increase density and redesignate the area from Eastsound Residential 1 DU/ ac to Eastsound Residential 4 DU/ac.	
11		363244001000 363250021000 363250023000	Designate as Mineral Resource Lands Overlay (MRLO) District. Located on San Juan Island.	Designate parcel 363244001000 MRLO.	No change in land use expected. No change in underlying designation or permitted uses. Recognizes existing land use on property and allows continued use. See discussion of MRLO below.
12	18-0012	450113005000, 450111003000	Designate as Mineral Resource Lands Overlay (MRLO) District. Located on San Juan Island.	Designate MRLO.	No change in land use expected. No change in underlying designation or permitted uses. Recognizes existing land use on property and allows continued use. See discussion of MRLO below.

Table 7-3 Recommended Changes to Official Comprehensive Plans Maps

Map ID #	Request Number	Parcel Number(s)	Request Summary	Recommendation	Potential Impacts
13		260221001000	Designate as Mineral Resource Lands Overlay (MRLO) District. Located on Orcas Island.	Designate MRLO.	No change in land use expected. No change in underlying designation or permitted uses. Recognizes existing land use on property and allows continued use. See discussion of MRLO below.
13		260222001000	Designate as Mineral Resource Lands Overlay (MRLO) District. Located on Orcas Island.	Designate MRLO.	No change in land use expected. No change in underlying designation or permitted uses. Recognizes existing land use on property and allows continued use. See discussion of MRLO below.
14		260223001000	Designate as Mineral Resource Lands Overlay (MRLO) District. Located on Orcas Island.	Designate MRLO.	No change in land use expected. No change in underlying designation or permitted uses. Recognizes existing land use on property and allows continued use. See discussion of MRLO below.
14		272750007000 272750002000	Designate as Mineral Resource Lands Overlay (MRLO) District. Located on Orcas Island.	Designate MRLO.	No change in land use expected. No change in underlying designation or permitted uses. Recognizes existing land use on property and allows continued use. See discussion of MRLO below.

One request to re-designate a property because the existing school on it is considered a non-conforming use is recommended to be declined. As an alternative, the Planning Commission has recommended changing the zoning to allow existing schools in that zone to be considered permitted uses. Because this would simply allow an existing school to continue, it would not result in adverse impacts. Any change in regulations would require additional environmental review, and impacts such as potential expansion of existing schools can be addressed through that process.

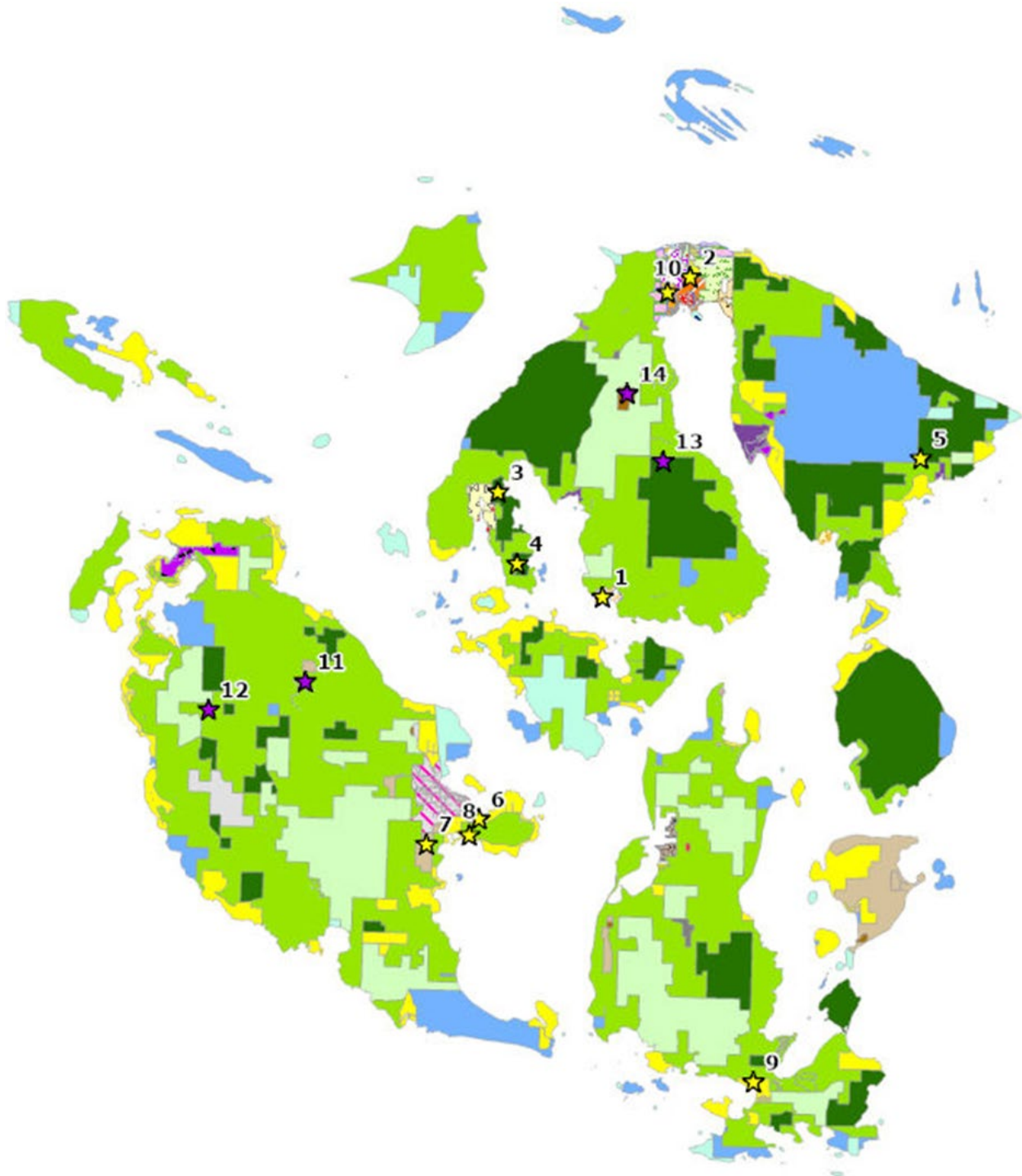


Figure 7-1
Map Showing Recommended Changes to Official Comprehensive Plan Maps



Figure 7-1a
Legend for Figure LU-1

In addition, the County proposes to establish a Mineral Resource Lands Overlay (MRLO) District that would apply to existing non-conforming mineral extraction sites. The sites that the MRLO would apply to are listed in a memorandum to the San Juan County Planning Commission dated July 2, 2021, and are shown in **Table 7-4**.⁸ The MRLO does not change the underlying designation of those parcels, but would recognize the existing operations as legal non-conformities, as a means to protect these important resource properties from nuisance lawsuits based on their nonconforming status.

Table 7-4 Proposed Mineral Resource Land Overlay District Parcels

TPN	Location	Island	Owner
363244001000	65 Gill Ln	San Juan	Egg Lake Quarry LLC
363250021000	Gill Ln	San Juan	Egg Lake Quarry LLC
363250023000	185 Crestview	San Juan	Egg Lake Quarry LLC
450113005000	Trevathan Hollow Rd	San Juan	West Valley Holdings LLC
450111003000	Saanich Rd	San Juan	West Valley Holdings LLC
260221001000	508 Elsie Rd	Orcas	Dolphin Bay Quarry Property LLC
260222001000	436 Quarry Ln	Orcas	Boxeur Corporation
260223001000	Mountain Crest Dr	Orcas	Mountain Crest Quarry LLC
272750007000	Gravel Pit Rd	Orcas	Boxeur Corporation
272750002000	186 Gravel Pit Rd	Orcas	Boxeur Corporation

The MRLO designation is intended to balance compatibility issues with mineral resource operations to ensure that these economically critical resources remain available, while ensuring reasonable practices for limiting environmental impacts. The revised policies also include a new policy to require a reclamation plan for new mining activities. Establishing the MRLO with policies protecting existing mineral extraction in appropriate locations and requiring a reclamation plan with any new facilities would not authorize any expanded operations without further environmental review and permitting; therefore, the MRLO is not expected to cause adverse impacts to the environment.

The Land Use and Rural Element includes a new proposed UGA Policy 2.3.(3) with criteria for designating new lands as unincorporated UGAs. The existing Element does not include policies for designating new areas as UGAs or the expansion of existing UGAs. The designation criteria establish standards for making decisions when the County considers changing the UGA boundaries or receives an application for expansion of a UGA. The criteria ensure logical boundaries and protection of agricultural, forest, and mineral lands from urban encroachment. The County Code requires that any change to the Comprehensive Plan Official Maps be consistent with the goals and policies of the Comprehensive Plan. The proposed criteria will therefore help to ensure compatibility and will not have adverse environmental impacts.

⁸ San Juan County, *Memorandum San Juan County Comprehensive Plan Element B.2 Land Use and Rural Mineral Resource Lands Overlay* (July 2, 2021), accessed June 2022, <https://www.sanjuanco.com/DocumentCenter/View/23413/July-2-2021-Staff-Memo-re-Mineral-Resource-Land-Overlay-for-Planning-Commission-July-16-2021>.

The draft Land Use and Rural Element includes goals and policies that support compatible development and includes specific guidance for residential, commercial, and industrial compatibility. Existing regulations in the County Code also provide for compatibility between adjacent land uses, and for mitigating the traffic and noise impacts of new development. This policy and regulatory framework will help to mitigate any land use compatibility issues that arise as the County grows.

Resource Lands

The Land Use and Rural Element seeks to recognize and protect agricultural, forest, and mineral resource lands, including the social and environmental benefits, which are conducive to the use of such lands for long-term commercial production.

The proposed goal and policy changes in Policy 2.4.3.(a) further promote the conservation and protection of agricultural resource lands; in Policy 2.4.3.(b) refine criteria for Forest Resource Land designation and expand protection of Forest Resource Land to include ecosystem services beyond commercial significance; and in Policy 2.4.3.(c) expand MRLO District designation criteria as well as provide requirements for new mining activities. The environmental impacts of these policies will depend on how they are implemented but would likely result in environmental benefits and additional conservation. Significant adverse environmental impacts are not anticipated because these policies promote improved stewardship and protection of resource lands.

Community Character

The Land Use and Rural Element establishes the desired character, quality, and patterns of development and promotes compatible development that honors the natural and rural character of San Juan County, while also providing for compact growth in designated UGAs. Rural character is described below under *Rural Lands*. The proposed policy changes in Policy 3 of section 2.3. establish the criteria for designating new lands as UGAs that are designed to protect resource lands from urban encroachment. The addition of a new goal in section 2.3, Goal 2 clarifies the County's intent to preserve community character in unincorporated growth areas, which also supports the County's rural character and identity. Supporting policy language of the new Goal 2 seeks to establish guidelines for development in UGAs to preserve community character, as well as to establish street design, lighting, dimensional standards, infrastructure to support walking and bicycling, standards that minimize air and water pollution, and standards for other uses that minimize impacts on other surrounding land uses and the natural environment. Neither of these changes in section 2.3 would harm community character. The environmental impacts of these policies will depend on how they are implemented but would likely result in environmental benefits by clarifying and adding protection for community character. Significant adverse environmental impacts are not anticipated.

Rural Lands

Most of the County's land are designated as rural lands on the Comprehensive Plan Official Maps. The primary objective of the Rural Lands section of the Land Use and Rural Element is preservation of the County's rural character and land use patterns from sprawl. The draft Rural Lands section in the Plan Update is new per GMA requirement RCW 36.70A.070(5). This new Element outlines GMA Rural Element Requirements, provides a definition for rural character, and establishes policies that allow rural development in designated rural lands while protecting rural character. The Comprehensive Plan also adds a new goal in section 2.5.1 to protect rural character while allowing a mix of uses that support the ability of residents to live and work in rural lands. The Rural Lands Element now includes the policies for limited areas of more intense rural development that exist in the current Comprehensive Plan; however,

those policies have not substantially changed. The environmental impacts of the Rural Lands policies will depend on how they are implemented but would likely result in environmental benefits because the policies are directed at preserving rural character including natural resources, wildlife habitat, and aesthetics, while allowing for activity centers and rural industries in specific locations where they are compatible with other rural uses. Significant adverse environmental impacts are not anticipated.

Climate Change

Three new climate change goals and subsequent policies were added to the Land Use and Rural Element in section 2.2. San Juan County government has acknowledged the urgency of responding to the climate crisis in Resolution 20-2020. Climate change is pertinent to all Comprehensive Plan elements. Rather than creating a separate Element for climate change, climate change has been incorporated throughout the Plan Update because it applies to everything. By integrating climate change in each of the Elements, climate change can be applied directly to County regulations and programs through goals and policies specifically targeted at the ten planning areas. The new goals and policies for climate change in the Land Use and Rural Element seek to commit resources for a climate change impact study, create innovative development regulations and programs to reduce the carbon footprint of new development, and maintain and enhance natural and nature-based systems in the built environment that provide valuable services that support climate adaptation, mitigation, and resilience. The impacts of these policies will depend on how they are implemented, but will likely be environmentally beneficial and may reduce greenhouse gas emissions and help San Juan County avoid or reduce some of the potential adverse impacts that will result from climate change.

Agriculture

The Land Use and Rural Element includes a new draft Agriculture section in 2.2.N., with a proposed goal and related policies designed to protect existing agricultural land and promote diverse agricultural activities that enhance stewardship and economic viability, while maintaining the rural character of San Juan County. The lands affected by these policies are already in agricultural use, and the policies promote best management practices for land stewardship; therefore, these policies will likely result in environmental benefits, and significant adverse environmental impacts are not anticipated. Policies to promote innovative agricultural accessory uses could increase tourism, establish biomass recycling, and seasonal housing for farm workers. These could result in the conversion of small areas of agricultural lands to non-agricultural use but could be limited through implementing legislation to allow such uses.

7.4 Water Resources

7.4.a Introduction

The County is proposing to repeal and replace the existing 2010 Water Resources Element with the draft Water Resources Element. The Water Resources Element provides an overview of freshwater in San Juan County, including sources and systems, ground and surface water protection measures, stormwater management, and natural resource stewardship. This element establishes goals and policies for managing water resources through measurement, monitoring, and protection strategies.

Table 7-5 Key Water Resources Issues

Key Issues	Potential Impacts
Water Resources	
<p>Water Resources <i>Do policies protect San Juan County's water resources?</i></p>	<p>Existing and amended goal and policy guidance seeks to protect the County's water sources, ground and surface water, storm and surface water, and natural resources. The environmental impacts of these policies would likely be positive. Although the number of policies has been greatly reduced, the overall effect of the policies should remain comprehensive and provide equal or greater protection to water resources.</p>

7.4.b Proposed Policies and Potential Impacts

7.4.b.1 Water Resources

The proposed policies and amendments in the Water Resources Element carry forward and expand upon the direction established in the 1998 Comprehensive Plan. The proposed section consolidates several goals and policies, so that the number of Goals was reduced from 16 to 11, and the number of policies reduced from 54 to 14. A few adopted policies would be moved to goals, as well. Though consolidated, the proposed policies retain similar protection for water resources, with less redundancy.

Goals and policies provide guidance related to resource protection for all water types, including surface and stormwater, groundwater, and marine receiving waters. The proposed goals and policies add climate change as a consideration for water availability, highlight specific concern around seawater intrusion and instream flows, and encourage education and incentives for best practices through monitoring and water use efficiency measures. These new policies would not adversely affect water resources and would likely have a beneficial effect on water resources, habitat, and sustainability of land uses in the County. A policy has also been added to adopt new policies regarding rainwater catchment. Any new policies on catchment would require their own environmental review before adoption.

The proposed policies eliminate goals that specifically address protection of water for agricultural uses as development occurs. These goals are replaced with policies that address protection of all beneficial uses of water from impairment by development. While the primary responsibility for protecting water rights rests with the state, the new policies ensure that the County considers whether development permitted by the County adversely affects water supply for agriculture as well as other uses. Existing critical areas regulations also protect all areas of the County as critical aquifer resources; therefore, protection of water resources would continue.

7.5 Housing

7.5.a Introduction

The existing Housing Element was adopted in 2009 and contains dated information which will be repealed and replaced by the new draft Element. The aim of the Housing Element is to meet the projected population’s housing needs during 2036 planning period and beyond. The Housing Element includes goals and policies that will guide County development regulations and programs from a high level. The data and analysis informing the new draft Housing Element was drawn from the Housing Needs Assessment (refer to Comprehensive Plan Appendix 5).⁹

Table 7-6 Key Housing Issues

Key Issues	Potential Impacts
Housing	
<p>Housing Affordability <i>Do policies support and encourage the provision of housing for a variety of household incomes, including low income?</i></p>	<p>Existing and proposed policies support the creation of more affordable options, with an emphasis on year-round residents, employees in essential services, and people experiencing homelessness.</p>
<p>Housing Diversity <i>Do policies support a range of housing types that meet the community’s needs?</i> <i>Do policies address changing housing needs associated with an aging population and the problem of homelessness?</i></p>	<p>No major changes to the housing mix are proposed. Existing and proposed policies seek to expand the range of housing types the County should consider to meet housing needs. This includes recognition that younger people have trouble finding housing that is affordable within the limits of their income, while the population of older and retired people continues to grow. Options such as RV parks and small home parks would be considered to address low-income affordability and homelessness, but no specific plan is offered to allow these types of housing.</p>

7.5.b Proposed Policies and Potential Impacts

7.5.b.1 Housing

The aim of the Housing Element is to meet the projected population’s housing needs during the 2036 planning period and beyond. The Housing Element includes goals and policies that guide County development regulations and programs from a high level. In 2018, the County and community developed new language for the Comprehensive Plan Vision regarding housing. The data and analysis informing the new draft Housing Element were drawn from the Housing Needs Assessment (HNA) (refer to Comprehensive Plan Appendix 5).¹⁰ The HNA revealed the critical housing issues that the Comprehensive Plan should address through the goals and policies of the Housing Element, which shape County regulations and programs.

⁹ San Juan County, *San Juan County Comprehensive Plan* (December 20, 1998, April 27, 2010), Appendix 5, Housing Needs Assessment (March 28, 2019, revised January 8, 2021), accessed June 2022, www.sanjuanco.com/510/Comprehensive-Plan.

¹⁰ San Juan County, *San Juan County Comprehensive Plan* (December 20, 1998, April 27, 2010), Appendix 5, Housing Needs Assessment (March 28, 2019, revised January 8, 2021), accessed June 2022, www.sanjuanco.com/510/Comprehensive-Plan.

Proposed policy revisions and amendments include directives to:

- Continue to monitor the effects of short-term vacation rentals on the community and housing stock.
- Consider options for the inclusion of small home parks and RV parks for long-term housing needs.
- Review housing capacity and production in the UGAs on an ongoing basis.
- Amend the San Juan County Unified Development Code and Building Code to better allow for the development of Tiny Houses and Tiny House communities, as defined by RCW 35.21.686(4)(a).
- Consider revisions to the Land Development Code and Building Code to maximize the livable square footage on parcels for housing.
- Ensure that in addition to the County, developers have a long-term stewardship plan for monitoring the resale of small-scale rural residential clusters.
- Encourage public sector employers and essential service providers to provide affordable housing options for their employees utilizing lands currently owned and operated by those entities.
- Explore and implement ways to better utilize Accessory Dwelling Units as long-term affordable housing.
- Review Urban Growth Areas on an ongoing basis.
- Support efforts to develop farmworker housing (Goal 1, Policies 3 and 4; Goal 5, Policy 5; and Goal 6, Policy 7).
- Promote resilience to climate change as well as reductions to greenhouse gas emissions from new and existing housing (Goal 5 and associated policies).

Overall, these policies aim to provide sufficient housing for the population in a sustainable, affordable, and equitable manner. Amendments to the Unified Development Code or Building Code (such as revisions to maximize living space or accommodate Tiny House communities) could result in more intensive development being allowed in certain locations, with attendant impacts on roads, public services, and other elements of the environment. Any amendments would include additional environmental review at the time they are developed. The impact of the policies will depend on how they are implemented, but the policies are unlikely to have an adverse impact because the changes considered are small in scale and their impacts can be limited through implementing legislation and permit review.

7.6 Transportation

7.6.a Introduction

In general, the policies proposed in the draft Transportation Element for the Plan Update are consistent with the current adopted policy. Changes are proposed to clarify and refine language, to ensure consistency with other County and regional planning documents, and to address emerging issues. The policies include language to ensure that implementation will include mitigation for potential adverse environmental impacts. The environmental impacts of projects developed under the policy framework provided by the draft transportation element would likely not be significant. The San Juan County Code also includes regulations to control environmental impacts associated with transportation projects.

In 2018, the County reviewed and revised level of service (LOS) standards to reflect more appropriate traffic flow numbers.¹¹ Roadway capacity is measured based daily traffic volume (Annual Average Daily Traffic [AADT]). LOS thresholds were scaled based on the highest volume of daily traffic measured during the summer, 5,300 AADT on Roche Harbor Road, which was set as LOS C. The maximum acceptable threshold for traffic volume remains LOS D, but the criterion would be set at AADT <7,900, as compared to the current LOS D criterion of AADT <4,380. If a roadway has an LOS D or better, it is considered to have adequate capacity. The new standard is considered more accurate because it is based on recent traffic count data. By setting LOS D criterion at a higher vehicle volume, road segments or intersections will carry larger traffic volumes before they are considered for improvements. The result is that road improvements such as widening, adding lanes, or adding controls to intersections, are less likely to be required. This reduces the likelihood of impacts to the natural environment that could occur with those projects, but also allows higher traffic volumes to occur before improvements are considered.

In addition to the changes in LOS criteria, the following changes in policies were noted:

- Addition of Complete Streets policies
- Clarification of multimodal policies, including prioritizing bike facilities from ferry docks, and improved safety on bike routes
- Addition of resilience planning considerations, especially considerations related to climate change (such as sea level rise and managed retreat)
- Support for electrification of transportation
- Elimination of the policy supporting additional international ports of entry (airport) on Lopez and Orcas
- Support for the Washington State Ferries (WSF) 2040 Long Range Plan (LRP) in lieu of policies about ferry level of service
- Support for one public barge site on each island with County roads, provided that they are sited and constructed in accord with shoreline regulations and have parking availability, along with clarification of priorities for such facilities (but no change in order of priority)
- Clarification of bicycle safety policies and establishment of motorized bicycle safety policies

¹¹ San Juan County, *San Juan County Comprehensive Plan* (December 20, 1998, April 27, 2010), Appendix 6, Transportation (October 10, 2016, revised February 10, 2020, June 30, 2020, and September 14, 2020), accessed June 2022, www.sanjuanco.com/510/Comprehensive-Plan.

Table 7-7 Key Transportation Issues

Key Issues	Potential Impacts
Transportation	
<p>Consistency with Other Plans, Maintaining Levels of Service <i>Does the Element provide for projected growth consistent with other aspects of the Comp Plan and other County plans?</i></p>	<p>Updates to the Transportation Element include updated analysis of projected traffic volumes consistent with other elements of the Comp Plan, and policies to ensure that projects are consistent with other San Juan County plans, the WSF LRP, and the Coordinated Human Services Transportation Plan (CHSTP). Consistency with other plans and policies while maintaining levels of service helps minimize environmental impacts associated with traffic growth. Coordination with other plans would not directly result in any impacts.</p>
<p>Safety and Mobility <i>How are safety and mobility considered for all modes of transportation?</i></p>	<p>Proposed policy updates support increasing mobility and improving safety for non-motorized modes, barge freight, ferries, transit, bike/moped travel, boats. The change in LOS D criterion could limit the number of future projects to improve roadway mobility and safety. This could result in fewer impacts to the natural environment, but would mean that travelers could experience higher volumes and possibly higher congestion than under the current AADT criterion for LOS D. The replacement of County LOS standards for ferries with support for the WSF LRP would not materially affect which projects will be built, because those are primarily in WSF control. Changes to barge policies clarify existing policies and would minimize potential impacts on the natural environment. Overall, mobility would increase and safety would improve. No significant impacts are anticipated.</p>
<p>Operations, Maintenance, and Management <i>Does the Element address effective use of existing facilities?</i></p>	<p>The change to the criterion for an LOS D rating means that road improvements may occur at fewer locations. This would place greater emphasis on maintenance of existing transportation facilities, but affects only a small number of roads. The new policies also support the 2040 WSF Long Range Plan (LRP) vision, which includes a strategy to maintain reliable service through 2040 by preserving existing vessels. Overall, more emphasis on preservation of existing infrastructure would minimize potential adverse impacts on the natural environment, but could result in impacts to the built environment, such as mobility and safety, if volumes increase.</p>
<p>Sustainability <i>Does the Transportation Element consider the natural environment and human health concerns related to transportation?</i></p>	<p>The proposed policies support environmental sustainability, which would result in a more resilient community and resource-conserving community practices. New policies could increase projects for road maintenance, flood and erosion control, and could include relocation of some facilities. New policies also support measures to reduce GHG emissions, but these are generally not expected to result in adverse impacts, except that they could increase demand for electricity. Noxious weed policy changes reflect adopted Code and current practice and therefore are not expected cause adverse effects.</p>
<p>Equity <i>Does the Transportation Element provide for equitable access to all modes of transportation, and consider disadvantaged or vulnerable communities?</i></p>	<p>Proposed policy updates incorporate by reference the CHSTP, which was adopted in 2015 to address equity in transportation planning. The policy change is in recognition of an ongoing program and therefore no impacts are expected. Proposed Complete Streets policies also contribute to equitable mobility, and would entail smaller street improvement projects in limited areas where the Complete Streets program is implemented. No significant impacts are anticipated.</p>

7.6.b Proposed Policies, Impacts, and Mitigation

7.6.b.1 Consistency with Other Plans, Maintaining Level of Service

The updated Transportation Element retains policies ensuring consistency with other plans, including San Juan County plans and other regional plans. In many instances, details were removed from the Transportation Element and replaced with references to other in-place plans with relevant policies.

Referenced plans include the Six-Year Transportation Improvement Plan (TIP) and the Annual Construction Programs, biennial traffic counts and level of service (LOS) assessments, annual Complete Streets assessment, traffic collision assessment, and concurrency evaluations for proposed developments. New policies also address the 2018 San Juan County Human Services Transportation Plan (HSTP) update and the Marine Facility Annual Report and 6-Year TIP. The County also added draft goals related to Complete Streets, in accordance with Ordinance 24-2018, which is discussed further below.

The draft Transportation Element further states that the update is based on the San Juan County Parks, Trails and Natural Areas Plan and Nonmotorized Plan (PTNA-NM), which was developed to meet the multimodal transportation and recreational needs of the community, and on the revised policies in the San Juan County code related to structure setbacks from road rights-of-way. In addition, policies regarding new international ports of entry were removed from the Transportation Element, and the policies now refer to airport master plans for Friday Harbor, Lopez, and Orcas for identifying and prioritizing air transportation improvements and funding. Similarly, the plan removed County LOS standards for ferry facilities and replaced those with policies supporting the WSF LRP.

Updated language includes a new draft goal (6.2.C Goal 2) to ensure transportation impacts at the project and system levels are mitigated concurrently with the project in accordance with San Juan County standards. Transportation Element compliance with other plans and policies whose visions are to minimize adverse impacts on the environment and manage growth will result in overall minimization of environmental impacts and consistency for planning and growth throughout the County. No significant impacts are expected.

The draft Transportation Element update removes certain detailed information about LOS and retains a standard of LOS D or better for County roads, and refers to Comprehensive Plan Appendix 6 for the definition of LOS D.¹² All County roadways are operating at LOS D or better and are expected continue to operate at acceptable traffic volume levels for the next 20 years based on estimated traffic growth. Policies regarding intersections with unacceptable LOS are unchanged.

As a whole, the proposed changes to the Transportation Element provide for greater consistency with related plans and add language that would protect natural resources when a planned project does occur. As such, environmental impacts are expected to be similar to or less than would have occurred under existing policies.

7.6.b.2 Safety and Mobility

The proposed draft adds a new goal to the Transportation Element related to a Complete Streets program (6.2.A Goal 2), which encourages walking, bicycling, and use of public transportation; improving safety by designing roads to accommodate all users; and providing safe alternatives to single occupancy

¹² San Juan County, *San Juan County Comprehensive Plan* (December 20, 1998, April 27, 2010), Appendix 6, Transportation (October 10, 2016, revised February 10, 2020, June 30, 2020, and September 14, 2020), accessed June 2022, www.sanjuanco.com/510/Comprehensive-Plan.

driving. This policy is expected to result in projects such as sidewalk extensions, bike lanes, signage, and other improvements. These projects are likely to be small in scale, primarily use existing right-of-way, and have limited impacts.

A draft policy (6.4.B Policy 9) establishes support for the WSF LRP vision, which depends on a coordinated set of investments in WSF's fleet, terminal infrastructure, workforce, and technology, including a focus on strategic service enhancements that encourage bicycle and walk-on passengers. New WSF plans include expanding the ferry reservation system to include Lopez and Shaw, bike lanes from ferry landings for connectivity and safety, and encouraging bike safe roadway and trail designs to provide for safe separation of vehicles.

Although the Transportation Element would remove a policy (6.4.B Policy 17) related to support for public and private transit and other multi-modal transportation system opportunities that promote non-vehicular ferry trips and reduce the need for terminal parking, the plan retains policies supporting multi-modal or active transportation. The proposed Transportation Element would also remove a policy (6.4.B Policy 12 b. (2)) related to a future passenger terminal at Bellingham, although the County continues to support of alternative modes of transportation, including passenger-only ferries.

The Transportation Element states that the County shall adopt bike/moped safety programs and make them part of the PTNA-NM. The County shall also support the electrification of all transportation modes (including electric bikes), to include providing recharge stations at key County destinations (6.2.A Policies 10 and 11). These policies support mobility and safety. Impacts from these programs would be minor, but could include some new impervious surfaces, narrowing of vehicle lanes to accommodate bikes, and similar small-scale impacts to public rights-of-way.

Proposed changes to the Transportation Element include clarifications to Marine Transportation policies in Sections 6.4.A and 6.4.C regarding development of barge landings, indicating a focus on islands with County roads, support development of one public barge landing site per island, and place a preference on using existing facilities over building few ones. These clarifications recognize current practice, and limit the number of new facilities to be considered, thus also limiting impacts.

The update adds proposed language stating that the Transportation Element is based on the PTNA-NM, which was developed to meet the multimodal transportation and recreational needs of the community. The PTNA-NM establishes the community's criteria for prioritizing nonmotorized projects, contains a trails classification system, identifies trail corridors for development, and identifies nonmotorized facility funding mechanisms and local financing options. The PTNA-NM also lists marine facilities and shore access sites within public right-of-way that can be used to provide access to motorized vessels or hand-carry boats and recreation.

Although the new LOS D AADT level defined in Comprehensive Plan Appendix 6 may result in higher volumes on certain roads before improvements are made, the Transportation Element update states that the County will continue to coordinate with the Town, Ports, and WSF to provide roadway continuity with marine and air transportation services, which will support countywide mobility. In

addition, Appendix 6 shows that even under the current criterion for LOS D, few roads would be rated at that LOS by 2036.¹³

Support for the WSF LRP in lieu of existing policies regarding ferry facility LOS means that the County is deferring to that plan, which has had its own environmental review process. Several improvements proposed for ferries to the San Juan Islands will support safety and mobility, such as: expansion of vehicle holding at Lopez in 2025–2027; construction of overhead loading and second slip at Friday Harbor (planned for 2025–2027); adding service hours; increasing vessel capacity and the number of vessels in future years; developing an emergency response plan. These projects would be built by WSDOT, and most would require permits from the County and would have their own environmental review. The change in policy is not expected to have adverse environmental effects, and the WSF LRP is expected to improve mobility over time.

7.6.b.3 Operations, Maintenance, and Management

The proposed change to the LOS D AADT criterion could reduce the number of new or expanded road facilities. The higher AADT criterion recognizes that existing roads can carry larger volumes while still providing for adequate traffic flow. This change is likely to result in a greater emphasis on maintenance of existing roadways over building new facilities. The shift is likely not a large one, however, since most roadways in the County would be at LOS D or better even with the existing criterion.

Existing and proposed policies stress a preference for using existing marine facilities rather than constructing new facilities. The shift from County LOS policies for ferries to support for the WSF LRP encourage the use of existing facilities to the extent feasible and prudent, while recognizing that some minor expansion is desirable. The policy does not directly authorize expanded facilities, and any such expansions would be reviewed to ensure compliance with County environmental regulations SEPA policies. Therefore, no significant impacts are expected.

7.6.b.4 Sustainability

Existing policies promote the development of transportation facilities that are environmentally sustainable. New policies clarify and expand on that theme, with added focus on climate change. A new goal (Section 6.2.A Goal 4) calls for an adaptation strategy for resilience to climate change (such as sea level rise, storm surge, and flooding), and several policies reinforce and expand on that goal (6.2.B Policy 9; 6.4.B Policies 9d and 17; 6.5.A Policy 10). Adaptation to climate change would help ensure longevity of the transportation facilities, but could also require projects such as road relocation, erosion control measures, and raising the elevation of some facilities, all of which could have environmental consequences such as clearing of forested areas or modification of shoreline processes. Individual projects would be evaluated to minimize impacts, but it should also be noted that the consequences of not taking such actions could be greater than these projects would have. A greater focus on community resiliency and adaptation regarding climate change impacts should minimize potential adverse impacts on the natural environment and the built environment in the future. With appropriate planning and adherence to County regulations, impacts are not expected to be significant.

Several policies also aim to reduce GHG emissions that contribute to climate change, such as through support for transit, non-motorized travel, and electrification of vehicles and vessels (6.2.A Goal 3.l and

¹³ San Juan County, *San Juan County Comprehensive Plan* (December 20, 1998, April 27, 2010), Appendix 6, Transportation (October 10, 2016, revised February 10, 2020, June 30, 2020, and September 14, 2020), accessed June 2022, www.sanjuanco.com/510/Comprehensive-Plan.

Policies 10 and 11; 6.4.B Policies 9.a and 16) These efforts would not have adverse effects on the environment, except to the extent that they would increase the demands on the electrical transmission system. Policies in other sections of the Comprehensive Plan address the need for coordination with the County's electrical utility provider and encourage expansion of energy generation and storage in the County. With appropriate coordination to provide infrastructure, significant adverse impacts are not expected.

Existing policy regarding noxious weed and pest control was to not use herbicides or pesticides. The proposed policy (6.5.B Policy 3.c) is to use "integrated management," which is an approach based on environmentally responsible practices. This shift is not expected to have adverse impacts because it reflects current practice as required by SJCC 18.60.090.

Policies to promote sustainability should reduce community GHG emissions, avoid some impacts to transportation infrastructure from climate change, and maintain a healthy environment, and are expected to cause only minor impacts associated with some projects and programs.

7.6.b.5 Equity

While the existing policies support social service transit options serving vulnerable populations, the proposed Transportation Element integrates the San Juan County Coordinated Human Services Transportation Plan (CHST) by reference (6.5.G Policies 2 and 7). This change helps to ensure equitable access and is not expected to have adverse impacts on the environment because this plan was adopted in 2015. The policy change therefore simply recognizes existing practices and programs. In addition, the proposed Complete Streets policies, in accordance with Ordinance 24-2018, support equity and vulnerable populations by promoting healthy communities by designing walking villages and encouraging walking, bicycling, and use of public transportation; and by improving safety by designing roads to accommodate all users. Impacts associated with Complete Streets are discussed under Safety and Mobility, and are expected to be minor.

7.7 Capital Facilities

7.7.a Introduction

The purpose of the Capital Facilities Element is to set County goals and policies for maintaining and improving the quality of capital facilities and services. Goals and policies should be consistent with those for land use and development in the other elements of the Comprehensive Plan. The Capital Facilities Element is a mandatory component of a comprehensive plan prepared in accordance with specific requirements are set forth in the GMA (RCW 36.70A.070).

The draft proposed element would replace the adopted element from 2009. Most proposed changes include updates to outdated information and formatting changes to improve consistency with other elements of the Comprehensive Plan. A new draft goal and new draft policies are discussed below.

Table 7-8 Key Capital Facilities Issues

Key Issues	Potential Impacts
Capital Facilities	
<p>Infrastructure Lifespan and Changing Conditions</p> <p><i>Does the Comprehensive Plan consider the potential impacts of changing conditions on infrastructure lifespan?</i></p>	<p>The proposed Capital Facilities Element supports resilient capital facilities and consideration of the potential impacts of future climate conditions. These policies would have a positive impact on the lifespan of infrastructure by ensuring that climate change factors are considered in operation and maintenance and as such would likely limit environmental impacts that could occur because of infrastructure failure, such as a reduction in available service, or reduced capacity to respond to emergencies.</p>

7.7.b Proposed Policies and Potential Impacts

7.7.b.1 Capital Facilities

Policies identifying each Essential Public Facility were removed because they are included in the Land Use and Rural Element. The level of service (LOS) equations and standard tables previously existed in various parts of the goals and policies in the 2009 element and were moved to Comprehensive Plan Appendix 7, as an attachment so that they are easy to find in one location.¹⁴ The CFP includes the LOS inventories and assessments of and identifies current deficiencies in existing facilities and services that will need to be expanded to serve new growth. These changes are not anticipated to have any impacts.

The draft Capital Facilities Element includes new policy language to address issues that have become more prominent since the last Comprehensive Plan Update, such as the potential impacts of changing conditions like climate change and technological change.

A new draft Policy 8 is proposed in 7.3, Community Sewage Treatment Facilities, *“Encourage service providers to offer commercial composting, or other biomass value-added processing methods that can*

¹⁴ San Juan County, *San Juan County Comprehensive Plan* (December 20, 1998, April 27, 2010), Appendix 7, Capital Facilities and Services (June 2009, revised May 6, 2022), accessed June 2022, www.sanjuan.co/510/Comprehensive-Plan.

recycle nutrients for use in local agricultural production.” This policy promotes sustainable processes for generating renewable resources.

The addition of a new draft Goal 2 in 7.4, Infrastructure and Fleet Equipment, *“Operate and maintain infrastructure and fleet equipment that have reduced environmental impact and that are resilient to climate change”* and supporting draft four policies seek to integrate climate change considerations into County government services. The proposed draft policies promote switching to electric vehicles for new fleet purchases, using electric alternatives over two-stroke engine equipment, providing recharge stations, and instituting a policy of managed retreat for public infrastructure away from climate-impacted locations. The addition of these draft policies would promote energy efficiency, reduce greenhouse gas emissions, and provide other benefits that reduce environmental impacts of County facilities, equipment, and infrastructure. Managed retreat, such as moving facilities or utilities that are likely to be damaged by sea level rise, can affect other properties and resources, such as through displacement of other uses, removal of trees or other habitat features, or noise generation. Any specific project would require additional environmental review to review impacts and provide appropriate mitigation.

Overall, impacts from the proposed changes in the Capital Facilities Element would be positive. No significant adverse impacts are anticipated because, although many projects are proposed, any impacts that would occur would be assessed and mitigated in the design and permitting process.

7.8 Utilities

7.8.a Introduction

The Utilities Element is a mandatory component of a Comprehensive Plan prepared in accordance with the WA Growth Management Act (GMA). RCW 36.70A.070(4) requires “a utilities element consisting of the general location, proposed location, and capacity of all existing and proposed utilities, including, but not limited to, electrical lines, telecommunication lines, and natural gas lines.”

The Utilities Element contains background information, goals, and policies for electricity, propane, telecommunications, internet, and cable services. Because there are no natural gas services in the County, this element discusses propane, a gas utility common throughout the islands, instead. The County last updated the Utilities Element in 2005. Comprehensive Plan Appendix 8 includes required information on the locations and capacities of utility facilities.¹⁵

Table 7-9 Key Utilities Issues

Key Issues	Potential Impacts
Utilities	
Utilities <i>Does the Comprehensive Plan consider the impacts of utilities on preserving rural character?</i>	Existing and proposed policies support minimizing impacts to the rural character, shorelines, and natural environment of the County. No significant impacts are anticipated.
Utilities <i>Does the Comprehensive Plan promote energy efficiency and reduction of environmental impacts?</i>	Existing and proposed policies seek to reduce carbon emissions by increasing reliance on electricity if it comes from clean, renewable sources, and is used as efficiently as possible. New proposed language regarding energy efficiency is included (8.5.B. Goal 6, Policy 6). Policies are added to support continued propane use, a relatively clean-burning fossil fuel. Overall, no significant impacts are anticipated.

7.8.b Proposed Policies and Potential Impacts

7.8.b.1 Utilities

The draft Utilities Element contains an expanded introduction with suggestions from Orcas Power and Light Cooperative (OPALCO) to update old information in the Utilities Element as well as the Utilities Inventory, including draft language about promoting solar projects in the County and a table of electric vehicle charging stations. These proposed changes seek to provide the most-current information and do not suggest any new changes to the goals or policies; therefore, no adverse impacts are anticipated.

Generally, proposed amendments to existing goals and policies address updates to the Utilities Inventory. New draft language in Goal 3 Policy 2 states, “Continue to allow utility exemptions from critical area requirements for the installation and construction of utility lines and equipment, provided the conditions of exemption are met and documented.” Exemptions are allowed in critical areas only where the impacts would be minor, are generally unavoidable, and can be mitigated if best practices are

¹⁵ San Juan County, *San Juan County Comprehensive Plan* (December 20, 1998, April 27, 2010), Appendix 8, Utilities Inventory and Existing Conditions (August 4, 2017, revised April 3, 2020), accessed June 2022, www.sanjuanco.com/510/Comprehensive-Plan.

followed. Any specific project would be reviewed to ensure that these conditions are met. No significant impacts are expected.

The draft updated Goal 4 repurposes goals that existed in the old Goal 3 and adds Policy 3 requiring landscaping to buffer adjacent uses for new utility installations. These policies protect rural character and the natural environment, and no significant impacts are anticipated.

The draft Utilities Element also contains significant proposed updates to the Electricity section. Goal 6 adds language that seeks to minimize environmental impacts. Draft additions to supporting policies aim to promote solar energy, reduce greenhouse gas emissions, support distribution of electricity for cleaner transportation, encourage electric vehicle chargers throughout the County, increase energy efficiency of buildings and systems on the islands, and ensure that solar installations are sited and designed to minimize impacts on agricultural land. These proposed changes would improve protection of rural character and natural resources, and no significant adverse impacts are anticipated.

A proposed new section, Propane, adds a new Goal 9 that recognizes propane as a heating source widely used in the County, and policies to identify appropriate siting for bulk fuel storage, support use of historic barge landings for transporting bulk fuels, and develop safe transportation and circulation routes for transport of propane. While propane is derived from fossil fuels and combustion produces carbon dioxide, a greenhouse gas, it is a relatively clean-burning fuel compared to heating oil or other fossil fuels used for heating. Any project to establish a bulk storage site would require additional environmental review to review impacts and provide appropriate mitigation. Other policies would limit potential impacts. No significant impacts are anticipated.

While Goal 5 Policy 1 *“View environmental protection and a quality environment as one product of, and not a constraint on, good utility service ...”* is proposed to be removed, the emphasis on environmental protection and reducing environmental impacts are included throughout proposed changes to the Element. Goal 7 has a new proposed Policy 6 *“Provide opportunities within land use designations for the development and use of renewable energy resources which are compatible with natural environment and rural character.”* No significant impacts are anticipated.

7.9 Historic and Archaeological Preservation

7.9.a Introduction

The purpose of the Historic and Archaeological Preservation Element is to establish policies to identify, protect, and preserve the historic and cultural resources of San Juan County. The policies in this Element can be used to support development code changes and County programs. Although this Element is not a required part of the Comprehensive Plan, San Juan County has opted to include it because the County values protecting the historic and archaeological sites that remain to this day.

Table 7-10 Key Historic and Archaeological Preservation Issues

Key Issues	Potential Impacts
Historic and Archaeological Preservation	
<i>Do policies support effective historic preservation in San Juan County?</i>	Policy language in the draft Historic and Archaeological Preservation Element seeks to protect and preserve historic, cultural, and archaeological resources in San Juan County. No significant negative impacts of these policies are anticipated.

7.9.b Proposed Policies and Potential Impacts Mitigation

7.9.b.1 Historic and Archaeological Preservation

New proposed policies support additional protection of historic resources, including clarifying the criteria that currently exempt the segregation of parcels from platting requirements if they have significant historic or archaeological resources (9.2.2.a), as well as a policy regarding permit application review and coordination with entities (9.2.4), providing early cultural resources review for applicants, and requiring reporting standards and professional qualifications cultural resource reports.

Existing policies related to working with historical societies to prepare a historic preservation plan (9.2.2) and the creation of a Historic Review Board (9.2.5) are proposed to be eliminated. Although the County no longer intends to create a plan or Review Board, the County will continue to work with entities having expertise in historic and cultural resources, as it has in the past, including with state and tribal experts, historical societies. Because the policy to create a plan or Review Board was never implemented, no change would result from elimination of these policies.

The draft amendments and revisions would not reduce the existing SEPA review requirements for future projects to consider the potential impacts on archaeological and historic resources. Because the changes would not reduce the review of future projects, and those projects will still be reviewed for their potential impacts, no significant adverse impacts are anticipated.

7.10 Economic Development

7.10.a Introduction

The Economic Development Element (EDE) sets goals and policies, objectives, and actions to attain economic growth and vitality consistent with the distinctive quality of life in the County. This EDE is intended to integrate with and govern the economic aspects of the other elements of the Comprehensive Plan.

The proposed EDE replaces the existing EDE adopted in 2014. The proposed EDE replaces the previous version with a restructured outline that retains and updates two of the goals and replaces the other two with new goals. Policies in all sections have been updated, as have the “actions” listed for each goal. In the 2014 EDE, Goal 3 focused on encouraging tourism, and Goal 4 on strengthening traditional industries. In the proposed EDE, these two goals have been replaced, as discussed below. However, many policies under these two existing goals are integrated into other policies in the proposed EDE.

Overall, the proposed goal, policies, and actions include more specific language specifically focused on natural resource protection and mitigating adverse environmental impacts. The environmental impacts of projects developed under the policy framework provided by the draft Economic development Element (EDE) would likely be minor. Policy language in the draft EDE is designed to ensure that potential adverse environmental impacts are addressed as actions under the plan element are developed. The San Juan County Code also includes development regulations that will address environmental impacts associated with economic development. No significant impacts are anticipated from the proposed EDE because no major actions are proposed. Any projects would be subject to County regulations protecting the environment, and any legislative changes or specific projects that would develop from the plan would require additional environmental review.

This issue paper assesses the potential impacts from any substantive changes to the EDE. It does not list every change line-by-line but summarizes the general themes and changes in the Element. The key issues and potential impacts for the EDE are summarized in **Table 7-11**.

Table 7-11 Key Economic Development Issues

Key Issues	Potential Impacts
Economic Development	
<p>Economic Diversity and Vitality <i>Do the proposed economic development policies and actions promote desired economic diversity and vitality?</i></p>	<p>Overall, the proposed policies and actions are likely to have a positive effect by encouraging locally focused long-term growth while promoting sustainable practices to protect and preserve natural assets. The impacts of these policies are likely be positive, because these actions would reduce the need for workers to travel for better paying jobs.</p>
<p>Supporting Local Workforce <i>Do the proposed economic development policies and actions promote sourcing jobs and labor locally?</i></p>	<p>The impacts of nurturing a local workforce are likely to be positive, because these actions would reduce the need for residents and workers to travel.</p>

Table 7-11 Key Economic Development Issues

Key Issues	Potential Impacts
<p>Infrastructure and Community Assets <i>Do the proposed economic development policies and actions promote improvement to infrastructure and community assets in harmony with the County’s natural resources?</i></p>	<p>The environmental impacts of these policies will depend on how they are implemented but would likely result in environmental benefits by promoting protection and preservation of environmental resources while maintaining infrastructure and community assets. No significant impacts are anticipated, although individual projects, such as energy generation and storage, providing barge access, or employing pervious paving systems, may have environmental impacts that would need to be addressed in the design and permitting process.</p>
<p>Economic Resilience <i>Do the proposed economic development policies and actions seek to enhance economic resilience to natural and economic disruptions?</i></p>	<p>The proposed EDE frames environmental issues, such as food security, the negative effects of climate change, and more as core components of economic resilience, which are likely to have a positive effect. No significant impacts are anticipated, although individual projects to ensure resilience, such as energy generation and storage, or affordable clustered or multifamily developments, may have environmental impacts that would need to be addressed in the design and permitting process.</p>

7.10.b Proposed Policies and Potential Impacts

7.10.b.1 Economic Diversity and Vitality

Goal 1 in the existing EDE focuses on creating living wage jobs. The proposed EDE retains this goal and proposes policies and actions that largely continue the existing policy direction and could include considering changes to development regulations to “maximize business opportunities while protecting natural capital.” The EDE seeks to establish and maintain a sound, stable, year-round, and locally based diversified economy that creates living wage jobs in community and environmentally friendly industries consistent with rural character. The proposed goal, policies, and actions in Section 10.3.B Goal 1 builds on the existing Goal 1, with proposed policies and actions that add a focus on healthcare (Section 10.3.B, Goal 1, Policy 6), sustainable and environmentally friendly construction methods (Section 10.3.B, Goal 1, Action 11), and agriculture (Section 10.3.B, Goal 1, Policy 7). Compared to the 2014 EDE, the proposed Goal 1 also adds a more robust definition of “living-wage jobs,” and adds emphasis on preserving rural character.

Overall, the proposed policies and actions are likely to have a positive effect by encouraging locally focused long-term growth while promoting sustainable practices to protect and preserve natural assets. No significant adverse impacts are anticipated.

7.10.b.2 Supporting Local Workforce

In the proposed EDE, the new Goal 2 is to improve the resident workforce to support and attract diverse businesses (in harmony with the County’s natural resources), perform work otherwise done by labor and skills sourced from outside the county, supplement an aging talent pool and service unmet needs for county residents. Proposed policies, and actions under Goal 2 (Section 10.3B) supplement those under Goal 1 and focus on training and employing the local population. New proposed policies focus on sustainable practices and low-environmental impact businesses (Section 10.3.B, Goal 2, Action 3), as well promoting jobs in agriculture (Section 10.3.B, Goal 2, Actions 6–7).

The environmental impacts of nurturing a local workforce are likely be positive, reducing travel and its associated impacts with little or no increased impact, therefore significant adverse impacts are not anticipated.

7.10.b.3 Infrastructure and Community Assets

In the 2014 EDE, Goal 2 was to improve infrastructure, while in the proposed EDE, this is Goal 3 (Section 10.3.B, Goal 3). The proposed EDE infrastructure policies focus on similar issues, but add greater emphasis to growing energy resources, and protecting natural resources such as for ecosystem services and for their cultural values to residents and tourists.

New proposed policies and actions in Section 10.3B Goal 3 support alternative energy and energy storage capability (Section 10.3B, Goal 3, Policy 5), recognize the ecosystem services performed by healthy soil as fundamental and essential county assets and support regenerative stewardship activities (Section 10.3B, Goal 3, Policy 9), recognize the critical necessity of the preservation and restoration of fragile and essential ecological assets as economic assets (Section 10.3B, Goal 3, Policy 10), encouraging habitat restoration in appropriate places using native plants wherever possible (Section 10.3B, Goal 3, Action 17), and enact degrees of regulatory preference for those businesses that take affirmative steps to reduce their environmental impact, with specific preference for the quietest means of marine and overland propulsion (Section 10.3B, Goal 3, Action 10). There is also an emphasis on treating the County's natural capital as essential infrastructure, much of which is owned or regulated by the County, the state of Washington or the federal government. As a whole, these new policies are likely to lead to more environmental protection.

Potential adverse impacts from actions proposed in the EDE are as follows:

1. (Section 10.3B, Goal 3, Action 7) "Improve waterfront infrastructure and access, particularly barge landing access throughout the county, by working with the ports and other entities to renovate existing barge landings or create new landing sites if found necessary and if consistent with preservation of the environment (e.g., shorelines, marine habitats) and human neighborhoods." As noted in this proposed action creating new landing sites could have potential adverse impacts to shoreline/marine habitat, but to be consistent with this policy, new sites would have to be consistent with overall efforts, such as the Shoreline Management Program, to preserve shoreline habitat.
2. (Section 10.3B, Goal 3, Action 5) "Use permeable asphalt or concrete as top layer paving or deeper, to allow drainage from roadways (which themselves act as collectors and stormwater conduits in the denser areas) to penetrate into base soil to slow storm drain rate of flow and allow breakdown of soaps, detergents, agricultural, petrochemical and other toxics to dilute and decompose before reaching drinking water and the Salish Sea. By expressly including the portions of county roads and barge sites so constructed or treated as municipal stormwater control facilities, provide for financial contribution by the existing storm water utility to defray the cost of such work." Projects involving paving can have adverse impacts, and permeable paving can reduce some impacts by allowing runoff to penetrate to the soil. Individual projects would include environmental review, and issues such as runoff water quality and quantity would need to be addressed.
3. Any actions that promote building new infrastructure, such as transportation, water supply, energy, or communications, could have an adverse impact depending on where they are built. Projects could displace current uses, affect scenic quality, or increase demands on services. No specific major projects are proposed, and none are anticipated.

The environmental impacts of these policies will depend on how they are implemented but would likely result in environmental benefits by promoting protection and preservation of environmental resources while maintaining infrastructure and community assets. Significant adverse environmental impacts are not anticipated.

7.10.b.4 Economic Resilience

Another new goal in the proposed EDE is Goal 4 to enhance economic resilience (Section 10.3.B, Goal 4). In contrast to the existing Goal 4 which emphasized traditional industries including agriculture, fishing, and forestry, this emphasizes diversifying the economy, reducing fossil fuel dependence, and otherwise preparing for climate change, potential hazards, or natural disasters. The proposed EDE strives to enhance economic resilience to natural and economic disruptions, both rapid (natural disasters, drought, recessions, etc.) and long-term (climate change, resource limitation, long-term economic or industry shifts, changing property values). New proposed goals, policies and actions in Section 10.3B Goal 4 include encouraging reduction and/or substitution of fossil fuel consumption (Section 10.3B, Goal 4, Action 4), increasing local food production and promoting land stewardship and food security as core components of economic resilience (Section 10.3B, Goal 4, Action 6), encouraging and improve spill prevention, spill response preparedness, and spill response capacity (Section 10.3B, Goal 4, Action 7), and encouraging community and governmental awareness, preparedness, and action regarding negative impacts from climate change (Section 10.3B, Goal 4, Action 8).

Potential adverse impacts are as follows:

1. (Section 10.3B, Goal 4, Action 6) “Adjust land use regulations to encourage low and middle income clustered and multifamily housing developments that share and so reduce utility costs, sited and designed to be consistent with the available natural resources, infrastructure and rural character.” Denser development can affect visual character, traffic, and utilities, among other elements of the environment. Legislation to change zoning and individual projects would be evaluated to ensure the consistency with available natural resources, infrastructure and rural character, therefore no significant impacts are anticipated.
2. (Section 10.3B, Goal 4, Action 9) “Enact appropriate land use regulations to encourage distributed energy generation and cooperate with OPALCO and to encourage the use of electric energy from local providers as an economically favorable alternative to fossil fuels.” New energy facilities could have adverse aesthetic impacts and could affect rural character in some locations.
3. (Section 10.3B, Goal 4, Action 14) “Enact regulatory incentives for energy efficient housing and commercial construction such as but not limited to permitting taller multi-floor terraced sod-roofed construction that maximizes natural light to its environs while increasing the productive volume over a smaller footprint.” Taller buildings could have impacts to aesthetics and rural character. Legislation to change zoning and individual projects would be evaluated for potential impacts and mitigation can be incorporated to avoid significant impacts.

The proposed amendments strive to frame environmental issues, such as food security, the negative effects of climate change, and more as core components of economic resilience, which are likely to have a positive effect. No adverse impacts are anticipated.

SECTION 8. PART C: SIGNATURE PAGE

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: David Williams

Name of Signee: David Williams

Position and Agency/Organization: Director, San Juan County Community Development

Date Submitted: 6/29/2022

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