

Adam Zack

From: joe symons <joesymons@me.com>
Sent: Wednesday, May 16, 2018 9:50 AM
To: Comp Plan Update; DL - Council; Lynda Guernsey
Subject: Testimony and comments regarding the joint PC/CC Hearing on the SJC Vision Statement to be held in Friday Harbor on 18 May 2018

To: SJC Planning Commission and County Council

CC: Erika Shook, DCD

From: Joe Symons, Olga WA

Date: 16 May 2018

Re: Testimony and comments regarding the joint PC/CC Hearing on the SJC Vision Statement to be held in Friday Harbor on 18 May 2018

Thank you all for the enormous amount of time you have already spent in working on the Vision Statement (VS) and, overall, the update to the Comprehensive Plan (CP). My comments reference the current updated version of the Vision Statement as shown online at

https://www.sanjuanco.com/DocumentCenter/View/15126/2018-05-01_DCD_Zack_Vision_Public_Hearing_Draft_Joint_PC_CC_05-18-2018

The work on the Vision Statement (VS) has been thoughtful, persistent, careful, nuanced and attentive to public input. I support the VS as crafted. Yes there are always tweaks, but there comes a point when we must collectively thank everyone for the work, accept the work, and move on to next steps. A whole parcel of comments I and others made in hopes of having them considered and included in the VS were ignored. So it goes. I hope the intent of those comments will be revised and incorporated in the goals, policies and UDC, per Adam's comment during the 16 March 2018 hearing that much public comment was put "in a parking lot" to be considered later.

My concerns extend far beyond the language of the VS. I am concerned about the principles that underlie the county's intentions regarding the update to the Comprehensive Plan (CP). If these principles are unstated, ignored, or marginalized, all the work done so far on the VS and indeed on the CP will be a stunning waste of taxpayer funding and, worse, a far-too-common betrayal of public trust.

As you know, the Washington State Dept of Commerce, responsible for GMA, establishes a checklist for each county to review and submit in preparing to update its CP. SJC must show it has done the work it had self-assigned according to the Commerce Dept. checklist. However, the Commerce Department does not review any of the work done by SJC.

Thus it is up to the county to honor its commitment to the update work, bounded only by its professional judgment, resources available, and fear of being found non-compliant if challenged.

From my observations, DCD is doing an outstanding job given its entirely-inadequate resources available to perform the CP update. The Council is remiss in not providing substantially more resources to advance the work. Not just the "checklist" work, but work that is far more important and here-to-fore, with the exception of a few locals attempting to consistently, politely and firmly remind staff and Council, entirely absent from consideration.

Likewise, the Planning Commission has done an exceptionally attentive job in studying the issues and carefully considering public input. However, the Planning Commission has yet to step outside its limited box to consider these larger issues. Given their dedication and skills, I hope they bust this process open. Someone has to.

Indeed, the Visioning Final Report states: " As has been stated elsewhere in this document and repeated in the process, **there is broad community concern that the promises made in the vision did not find their way fully into adopted policy.** Part of the Planning Commission's role will be to track how the vision aligns with the new comprehensive plan's policies and to recommend revisions to make them consistent." (pg 61)
<emphasis mine>

Consultants are careful in their choice of language. The word "fully" should be removed from the highlighted phrase in order to reflect reality.

What are the principles, what is the "work", that needs illumination?

First, perhaps the most important, is that the VS be truly considered, as it is now described on page one of the introduction to the CP, the "foundation" of the CP, upon which the entire plan (including the UDC) is constructed.

Right now, and for the past 25 years, the VS is window dressing. Since it was originally drafted, the fulltime resident population of the county has grown by a third. The summer seasonal population has soared. There is

nothing in the UDC that puts an eye on, much less a brake on, this market-driven, not plan driven, default process.

There has been no conversation about the CP structure. There's the Introduction, and then the plan elements. There's no "executive summary" in the Introduction which spells out what the impact of the plan will be, if enforced, during the 20 year planning horizon much less what the impact will be at buildout. There is no discussion of the impact of visitors, which are not recognized by GMA as part of the planning process. No mention or discussion of carrying capacity issues. No mention of sustainability or a host of other critical considerations.

The issue before you today is what changes will you make going forward? Will you put in an "executive summary"? Will you show what the current density map and visitor population will be "at buildout"? Will you indicate what the financial, environmental, community and all other impacts will be? Will you illuminate that the current process for development in SJC is not Plan driven, but Market driven, and that the Vision Statement is simply feel-good pablum unsupported by policies and the UDC?

Your choice is to do serious work on "operationalizing" and "honoring" the VS or acknowledging that it is really not the foundation of the plan. Ignoring the Vision Statement has been, and absent some serious integrity on your part, will continue to be, a hidden narrative. If you aren't going to honor it, then say so directly. Don't withhold the truth. Just because withholding is standard operating procedures for many individuals and organizations, it is unbecoming and unethical.

The "Governance" section of the VS calls for ethical, fair, impartial, responsive leaders that "provide reliable data".

I call on you to meet this standard. Be transparent. If you don't know what the buildout impacts are, allocate resources to find them out. If you (and the public), once exposed and educated to what the look, feel and costs of/to the county will be at buildout, including **all** population components (locals, part time property owners and visitors), find it unacceptable and inconsistent with the VS, then it is your job to craft a process to bring the Plan into alignment, i.e., into consistency, with the Vision Statement.

Given that no one can know precisely what the impacts will be, it is essential that the buildout impacts be given some margins, some buffers, that buy space, time, and options as the county moves toward capacity, to avoid or minimize the law of unintended consequences and very real tendencies toward overshoot. A lifeboat has a rated capacity and design standard, as does an airplane, restaurant, movie theatre, freeway, home, car, computer, ferry, network, road lane width, power line voltage and legal blood alcohol level. Exceed the capacity and the device, idea, system, or **place** will degrade and ultimately fail. An archipelago has a rated capacity; in this case, the rating system is the Vision Statement. It is critical to stay well within its capacity; everyone knows what it feels like when a car, ferry, plane, restaurant, etc. is actually filled to capacity. It feels crowded. The VS does

not have or imply anything to do with crowds. It implies the absence of crowds: "We support a diverse, resilient, and sustainable economy while respecting the natural world. This economy serves the needs of our community, and reflects the rural, residential, quiet, agricultural, marine and isolated nature of the islands." Other words peppered through the VS like "small scale", "natural environment" (mentioned 5 times), "careful stewards", "island culture", clearly speak to capacity maximums that are way below "crowd" levels.

All other principles that need illumination follow from this basic idea: that is, that the Plan, not the market, controls our forward process. We design an endpoint, a reasonable and workable way to get there, and we stick to it.

None of this is on the table now.

The current process by which the update is unfolding has serious inadequacies. As noted, DCD is underfunded. This is remedial. What could be more important than doing it right the first time? Americans have a phrase: "We didn't have time to do it right but we always have time to do it over." Another phrase is "Whoops!" There are others that would not be appropriate to public testimony, although SNAFU and FUBAR circle this territory. How refreshing it would be for SJC to really grab this bull by the horns? To show ourselves, and the country, that *someone can actually do it right!*

DCD, PC and CC are unresponsive to citizen comments. A submitted comment is not even acknowledged as received much less commented on. A citizen has no idea if the county has read it, thought about it, and has some opinion: good, bad, hard, easy, whatever.

Public process is seriously imbalanced. One can write and testify, but there are no opportunities for discussion. There are no kitchen table talks involving citizens and either staff or commissioners. Say what you want and sit down. That's it. Yes there are Council office hours. Under the circumstances where the big questions aren't even raised, this form of citizen input is insufficient and leads to positions advanced by special interests.

The elephant in the living room remains undiscussed and unrecognized in the constantly slipping schedule. How full (this means population of all types and their cumulative impacts) is consistent with the Vision Statement, and if the buildout projections exceed that, what steps will be taken to revise the UDC to ensure the Vision Statement is honored? A look at the official schedule shows that there is no place for this conversation, either as a technical memorandum or in the goals and policies. There is no place shown in the schedule for UDC modifications to ensure they are consistent with goals and policies, yet it is the UDC where the rubber meets the road.

The Vision Statement ends with a commitment:

OUR COMMITMENT: AS FORTUNATE CITIZENS OF THE SAN JUAN ISLANDS, WE COMMIT ourselves individually and communally to a future for ourselves and our children that reflects this vision.

My dictionary defines commit as follows:

pledge or bind (a person or an organization) to a certain course or policy:

- pledge or set aside (resources) for future use:

We are binding ourselves to a certain course, a certain policy. Other variations of the definition speak to set aside resources for future use, which is entirely what the Vision Statement is designed to do: **not to parade, but to achieve.**

You don't even have to start from scratch. The county already has the CCS and Nantucket Studies, funded and completed about 20 years ago and sitting, ignored, somewhere in the county archives.

What is needed is leadership. Start by allocating resources properly, by asking tough questions, defining the legal meaning of the essential terms in the Vision Statement, and by creating and nurturing comprehensive and extended community conversations to resolve those questions and definitions.

carpe diem