

**Adam Zack**

---

**From:** Jennifer Barcelos <jennifer@sanjuans.org>  
**Sent:** Thursday, April 18, 2019 3:47 PM  
**To:** Comp Plan Update  
**Cc:** Stephanie Buffum; Erika Shook  
**Subject:** EDE Comments  
**Attachments:** Friends\_of\_the\_San\_Juans\_comments\_Economic\_Dev\_Element.pdf

Dear Department of Community Development,

Please find attached our public comments for the "DRAFT Economic Development Element" of the county's comprehensive plan.

We respectfully submit our comments and would be happy to answer any questions related to our suggestions.

Best wishes,  
Jennifer

Jennifer Barcelos  
Director of Law & Policy  
Staff Attorney  
Friends of the San Juans  
P.O. Box 1344 | Friday Harbor, WA 98250  
Office: (360) 378-2319



April 18, 2019

**Comprehensive Plan Public Comments: Economic Development Element**

Submitted by: Friends of the San Juans  
*Jennifer Barcelos, Staff Attorney*  
[jennifer@sanjuans.org](mailto:jennifer@sanjuans.org)

**10.1.A**

The term “natural capital” is not clearly defined in this document. This term, if used moving forward, should be defined with respect to San Juan County’s unique marine waters, forests, shorelines, wetlands, agricultural lands, and open spaces.

**10.3.A**

The term “man-made” should be changed to “human-caused” or a similar term that is gender-neutral.

**10.3.B.1-4**

There are two comments in this section that are largely repetitive and should be consolidated into either a footnote or into the body of the “Goal 1: Create Living Wage Jobs” section.

**10.3.B.2, 32**

We support the county’s position that San Juan County Code needs to be updated to clarify that marijuana is not an agricultural product. In addition to creating a regulatory framework for marijuana production that does not negatively impact local food and fiber production, we urge the county add protections in this section for natural resources, such as shorelines, wetlands, and forests.

**10.3.B.3, 4 (Policies)**

We support this policy to encourage Washington State Ferries “to improve San Juan Islands ferry service, vessels, and infrastructure...”

**We also urge the county to add:** a statement about encouraging Washington State Ferries to invest in new quieter, hybrid-electric capable ferries for the San Juan Islands route.

### **10.3.B.3, 5 (Policies)**

We support the policies related to improving oil spill prevention and oil spill response capacity.

#### **We suggest the following changes:**

Encourage and improve oil spill prevention, oil spill response preparedness, and oil spill response capacity (equipment, personnel, and volunteers) for oil spills within the county and oil spills elsewhere that threaten the county's natural resources, economy, and the health and welfare of county residents.

### **10.3.B.3, 2 (Actions)**

We support this action, but suggest inclusion of climate adaptation measures, such as:

- i. "Design built infrastructure to incorporate the natural environment to help fulfill its function and over time, reduce its financial and/or environmental costs.

### **10.3.B.3, 18 (Actions)**

While we don't have specific language changes related to this action, it is important to note that the larger issue of barge landing sites is essentially unresolved in the county. FSJ has concerns over wholesale support for expansion of new sites due to the potential impacts on marine habitats and human neighborhoods.

### **10.3.B.3, 24 (Actions)**

We urge the county to support using Lodging Tax Funds for "environmental education and stewardship programs," rather than specifically calling out "restoration programs," given that restoration programs are likely to be too complex and expensive for this funding source but we support the intent of supporting environment actions with this type of funding..

### **10.3.B.4, 3 (Actions)**

#### **We suggest the following changes:**

Encourage local citizens to become involved in disaster preparedness by publicizing the county's vulnerability to transportation and communications interruptions; and its oil spill risk due to our close proximity to commercial vessel traffic, refineries, and terminals.

#### **10.3.B.4, 4 (Actions)**

The following action appears to be based on previous SJC resolutions. For example, [Resolution No. 11-2013 Regarding Legislative Priorities for the 2013-2014 Legislative Session](#)

Improve Oil Spill Prevention, Readiness, and Response

- Work with the Department of Ecology, Tribes, State Representatives, and the Governor to Identify San Juan County as a Staging Area to ensure that the 4- and 6-hour planning standards are resident

Planning standards for the San Juan County Planning Standard Area ([WAC 173-182-370](#)) are included in the State's Oil Spill Contingency Plan regulations for commercial vessels calling on ports in WA State. These requirements and associated funding have, in the past, provided some level of capacity and organizational support for IOSA (Islands Oil Spill Association), which previously also provided oil spill response resources for recreational and derelict vessel oil spills, as well as wildlife response.

In the event of a spill, the USCG would be the federal on-scene coordinator and San Juan County would have a supporting role in Incident Command.

Oil spill response capacity in the county (equipment, personnel, and volunteers) is needed for providing initial and ongoing response support for major oil spills from commercial vessels and/or facilities, as well as the capacity for responding to spills from recreational or derelict vessels.

#### **We suggest the following changes:**

Improve oil spill response capacity by updating WAC 173-182-370 to require the 4- and 6-hour planning standards to be resident.

#### **Suggested additional action:**

Ensure adequate and sustainable funding for IOSA to provide oil spill response capacity (equipment, personnel and volunteers) in San Juan County, including wildlife response capacity, for oil spills in the waters of San Juan County.

#### **10.3.B.4, 14 (Actions)**

**QUESTION:** Have drivers of high rent and land prices not been previously identified by the county? If there are previously-identified drivers, such as **vacation rentals**, we urge the county to list them in this action item.

### **10.3.B.4, 1-19 (Specific Projects)**

**QUESTION:** We are unclear about the statement “For projects to be eligible for funding, they must be designed to increase capacity and not address a deficiency, unless that deficiency is a direct impediment to economic development.” Please provide clarity about this statement in the revised EDE draft.

### **10.4.A (Overview)**

We urge the county to remove the second paragraph in this section, which begins with “*Old-timers remember when...*” This paragraph does not, we believe, provide helpful or meaningful clarity to the key economic opportunities and challenges facing the San Juan County community.

If this paragraph is left in the document, the term “Old-timers” should be changed to “long-term residents” or a similar term that is not as likely to cause offense and confusion.

### **10.4 Transportation Components Lines 22-24**

Regarding the mention of the county’s current decision to not join a local RTPPO: this is a forward-thinking visioning document and the county may very well choose to join a RTPPO in the future. We’d suggest changing the final sentence on line 24 to reflect this possibility.

### **10.4 Transportation Components Lines 7 and 8:**

As part of the San Juan Archipelago, San Juan County has a total area of 621 square miles, of which 174 square miles are land and 447 square miles are marine waters. (See: [http://www.newworldencyclopedia.org/entry/San\\_Juan\\_Archipelago](http://www.newworldencyclopedia.org/entry/San_Juan_Archipelago))

**Note:** the “San Juan Islands” are islands in the U.S. in multiple WA State counties. “San Juan County” and “San Juan Islands” are not interchangeable.

### **Lines 31 - 38:**

The following section is revised to include the *2015 VTRA (Vessel Traffic Risk Assessment)* and clarifies that the ERTV is an oil spill prevention asset.

The county is surrounded by marine waters with high volumes of both recreational and commercial vessel traffic that is cooperatively managed by US and Canadian Vessel Traffic Services. (See: [https://www.pacificarea.uscg.mil/Portals/8/District\\_13/sectpugetsound/VTSpugetsound/2018\\_VTSPS\\_UserMan.pdf](https://www.pacificarea.uscg.mil/Portals/8/District_13/sectpugetsound/VTSpugetsound/2018_VTSPS_UserMan.pdf), The VTRA [Vessel Traffic Risk Assessment] 2015 Final Report)

Updating the VTRA 2010 finds that within the study area (the Salish Sea up to the 49<sup>th</sup> parallel), the majority of the potential oil spill risk, by volume, from actual 2015 commercial vessel traffic, is in Rosario Strait and connecting waterways on the eastern side of San Juan County; that the greatest increase in oil spill risk, by volume, from proposed and permitted new and expanding terminal projects occurs on the northwest and western side of San Juan County, where Southern Resident Killer Whales and other species congregate.

San Juan County is surrounded by areas with significant—and potentially increasing—oil spill risk, whose consequences in turn would clearly be significant.

**Oil spill prevention has been determined as the highest environmental priority for the county**, as ranked by the Local Integrating Organization. Negative economic and environmental impacts from an oil spill could be catastrophic.

Several strategies for protection have been identified, including:

1. an increase in oil spill prevention measures by stationing an emergency response towing vessel (ERTV) in San Juan County, and
2. supporting the increased protection of marine water quality, habitat and local species from vessel traffic impacts.

#### **10.4 Transportation Components** **Page 22, Lines 1-2**

Please provide clarity on the phrase “creates an equivalence that can be capitalized on.”

#### **10.4 Infrastructure Components** **Page 22, Line 12**

We believe that the first full sentence, beginning on line 12 should read “**Outside** the designated urban growth areas” and not “**Inside** the designated urban growth areas...”

#### **10.4.B Major Industries**

**Accommodations/Dining/Tourism**  
**Page 24, Line 21**

Because of regulatory effectiveness issues and limitations of the county's authority, we suggest changing "Policies should enable county powers to protect wildlife and ecological systems within the county..." to "The county will work within the bounds of state and federal law to implement code that ensures protection of wildlife and ecological systems within the county."

Please also consider adding in a statement in this section about the benefit to the county of supporting our "scenic byways."

**10.4.B Major Industries**  
**Marine Resources**  
**Page 24, Line 38-43**

Please add in a statement about the economic element of shoreline protection, research, and restoration. This work brings jobs and money into the county.

**10.4.D Data & Charts**  
**Current Industries**  
**Page 34, Lines 4-9**

Please summarize the findings here of the "*Economic Analysis of Resource Lands*" report in this section and include the report in this element's appendix:  
[https://www.sanjuanco.com/DocumentCenter/View/14432/2018-1-2\\_Natural\\_Resource\\_Lands\\_Analysis-](https://www.sanjuanco.com/DocumentCenter/View/14432/2018-1-2_Natural_Resource_Lands_Analysis-)

**10.4.E Community Survey**  
**Page 39, Lines 13-15**

Friends of the San Juans **strongly agrees** with the majority of survey respondents in the preference to prioritize tourism infrastructure over tourism marketing.

Please include the full "San Juan Islands Visitor Study" in the appendix to this element of the comprehensive plan: <https://www.sanjuanco.com/1391/San-Juan-Islands-Visitor-Study>

**Additional Feedback**

We ask the county to clarify in this comprehensive plan element, whether or not **vacation rentals** are *commercial* in nature and/or *urban* in nature. Given the large

impact that vacation rentals have on both access to affordable housing and economic development, we advocate for vacation rentals being treated as commercial entities under the county comprehensive plan (and thus being discussed explicitly within this Economic Development element as well as in the Housing and Land Use elements of the Comprehensive Plan).