



Friends *of the* San Juans

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RE: Public Comment: San Juan County Comprehensive Landuse Plan update for Capital Facilities and Utilities Inventory Element

Thank you for providing this opportunity to comment on the San Juan County Comprehensive Landuse Plan update for Capital Facilities and Utilities Inventory Element.

The Friends of the San Juans (Friends) represents over 2000 members who live, work and recreate in the San Juan Islands. Our mission is to protect and restore the San Juan Islands and the Salish Sea for people and nature. We have been active since 1979, and work with diverse stakeholders, including citizens, tribal and non-tribal governmental agencies, as well as with other non-profit organizations in the transboundary waters of the Salish Sea.

Capital facilities are important because they support the growth envisioned in the County's Comprehensive Plan. Capital facilities for the purposes of this plan correctly include facilities owned by San Juan County and other public entities necessary to support the county's current and forecast population growth. These include, but are not limited to, roads, bridges, sewers, parks, water supply and conveyance systems, stormwater management systems, water and wastewater disposal and treatment systems, schools, fire facilities, and county buildings. This inventory should also include a broad range of local, state and federal public agencies such as state and national parks, Washington State Ferries and our Power Cooperative "OPALCO" that supports county operations and services.

The County can use planning best practices to identify, coordinate and prioritize projects, and be ready to apply for funding. The Capital Facilities Plan can help the county use its limited funding wisely and most efficiently to maximize funding opportunities. Additionally, the CFP amendment is a way for the County to be transparent with its capital improvement planning. The public has an opportunity to be informed of and comment on the county's capital improvement plan.

As required by the Washington State Growth Management Act (GMA), San Juan County must adopt comprehensive plans that identify key elements: 1. inventory of existing capital facilities and their capacities and locations; 2. **forecast future needs for such facilities** based on land use element, 3. the proposed location and capacities of new or expanded facilities; 4. minimum level of services; 5. include a six-year realistic financing plan and clearly identify sources of funding; and 6. re-adjust the comprehensive plan if funding is inadequate.

Three main drivers that make up the need for capital facilities include, operation and maintenance of existing facilities; **deficiencies in existing facilities and new facilities for projected new growth**. Counties required to plan under the GMA are authorized to “impose impact fees on development activity as part of the financing for public facilities...” (RCW 82.02.050(2)). This applies only to capital facilities owned and operated by governmental entities including: public streets and roads; publicly owned parks, open space, and recreation facilities; school facilities; and fire protection facilities.

Omissions and Trends

Since the last update in 2009, many things have changed in San Juan County impacting the cost of community services, energy, climate adaptation, housing, tourism, and the needs of our youth.

The Growth Management Act did not contemplate, nor plan for, the types of disruptions happening in our community such as climate related disruptions including but not limited to sea level rise, forest fire, water use, or over tourism. Nor did it contemplate trends in electrification of power for housing and transportation, vacation rentals or increased fare increases and cost of waste management.

Capital facilities planning needs to contemplate trends for this next comprehensive land-use update that include substantial new areas for our community including, but not limited to:

1. The creation of new facilities for industrial composting (food, cardboard) as well as glass crushing and commercial bio char areas or mobile units;
2. Fuel reduction - Feedstock holding areas for materials;
3. Youth - Increased homeless youth, needs of youth and school districts to provide services (e.g. housing, mental health, food, and foster care);
4. Incorporate sea level rise and salt water intrusion into all public facilities such as sewer district, schools, ports, planning.
5. Electric battery storage areas;
6. Alternative power source infrastructure (tidal, wave, solar, micro hydro).

Omission: forecast future needs for facilities

On Page 10 On ADD trends in Affordable Housing

Needs and funding trends for affordable housing, include funding to improve the affordability of both new and existing housing through investments in energy conservation and/or efficiency, and renewable energy generation. Require that UGA expansions include a permanent affordability requirement for at least 50% of the units created.

Page 46. Section 7.3.6 Proposed New Sections

ADD SECTION on other public land managers

Because of the national and international significance of the San Juan Islands, this plan should leverage the inclusion of our state and federal partners to help pay for additional facilities (bathrooms, transit, signage, waste reduction, fuel reduction, and cost sharing for all of these elements) through the inclusion of these facilities in the Capital Facilities Plan

State and Federal Land Managers in the San Juan County

- San Juan Island National Historic Parks.
- San Juan Islands National Wildlife Refuge and related light houses.
- San Juan Islands National Monument administered by the Bureau of Land Management
- Washington State Ferries Terminals
- Washington State Parks

Include these agencies in Capital facilities planning and cost share projects related to tourism planning, transportation, housing and water, waste water.

In Section 7.3.10 on page 82 ADD Health and Social Services section for Youth

Youth services and needs are not reflected in our CFP.

San Juan County Juvenile Services and public schools provide services to youth who are living in unstable housing each year. Many 'homeless' youth are students residing with a family member, friends, and are likely 'couch surfing,' or are in foster or "host" family care. Trend in Youth Services need to be included in this analysis. During the school year, families of students who are experiencing difficulty financially can sign up for the National School Lunch Program, which provides free or reduced lunch. The school also gives students weekend food packages.

Sources for constructing trends and needs in a new section titled, "Youth Services" include but are not limited to: All San Juan County public school superintendents, student housing questionnaires, school district trends for homeless youth, San Juan County Juvenile courts, and family resource centers on Orcas, San Juan and Lopez Islands.

These program statistics and trends should be captured in trends needs for youth transitional housing which except for a handful of foster or host homes is sorely lacking in San Juan County. We need to plan for transitional youth facilities in San Juan County.

On Page 11 ADD Trends in Waste Management

This plan should include a projections for refuse and recycled materials cost to increase for transportation and burial. This plan should include projections for industrial compost facilities on ferry served island.

On Page 75 ADD trends in Transportation and Marine Facilities

- Encouraging best practices for fleet management including electric and or hybrid fleet cars, electric charging stations at public facilities for cars and ferries.
- Include electric charging stations at docks, and county parking areas
- Plan for impacts of sea level rise and accompanying erosion when undertaking new construction or conducting repairs and maintenance of docks and associated parking areas.
- transit providers are providing expanded low /zero emissions transportation services that support the needs of local residents and visitors.

ADD NEW policies

1. Site all new capital facilities in places that are not at risk from potential sea level rise or extreme weather conditions.
2. Use the latest science to identify potential sea level rise, flood zones, and
3. other characteristics when identifying locations for capital facilities infrastructure.
4. Install low /zero emissions and energy -efficient energy systems in any new capital facilities.
5. All new County buildings should be LEED certified at the Gold or Platinum level.
6. Monitoring water quality and clean all drainage ferry parking areas in San Juan County.
7. Ensure that all plans consider climate change projections and anticipated impacts such as saltwater intrusion and precipitation change, and incorporate adaptation measures to increase climate resilience and ensure adequate fresh, clean water in the long term planning.
8. Paying for Capital Facilities
 - a. Ensure that costs of county-owned capital facilities are within the county's funding capacity, and equitably distributed between users and the county in general.
 - b. Promote efficient and joint use of facilities with neighboring governments
 - c. and private citizens through such measures as interlocal agreements and negotiated use of privately and publicly owned lands or facilities (such as open space, stormwater facilities or government buildings).
 - d. Explore regional funding strategies and agreements between the County, Town of Friday Harbor and Port Districts for financing of capital facilities costs.
 - e. Users pay for capital facilities, except when it is clearly in the public interest not to do so.

Sincerely,



Stephanie Buffum, MURP, MPA
Executive Director