



SAN JUAN COUNTY  
DEPARTMENT OF COMMUNITY DEVELOPMENT

135 Rhone Street, PO Box 947, Friday Harbor, WA 98250  
(360) 378-2354 | (360) 378-2116 | FAX (360) 378-3922  
cdp@sanjuanco.com | www.sanjuanco.com

**MEMO**

**DATE:** January 9, 2020

**TO:** San Juan County Council  
San Juan County Planning Commission

**CC:** Mike Thomas, County Manager

**FROM:** Sophia Cassam, Planner I *SC*  
Linda Kuller, AICP, Planning Manager *LK*

**RE:** Third Draft Utilities Inventory  
SJC Comprehensive Plan Appendix 8

**BRIEFINGS:** County Council January 27, 2020  
Planning Commission January 17, 2020

**ATTACHMENTS:** Attachment A: Third Draft Appendix 8: Utilities Inventory  
Attachment B: Public Comments on Second Draft Utilities Inventory

---

**Purpose:** Transmittal of a third draft inventory of utilities for review and comment. The January 3<sup>rd</sup> draft is posted on the Comprehensive Plan Update webpage under the Utilities tab at: <https://www.sanjuanco.com/1306/Comprehensive-Plan-Elements>.

The second draft inventory was released for comment in October 2019. This updated draft addresses comments received from the public, County Council and Planning Commission. Changes from the second draft are shown in red strikeout/underline.

**Summary of Major Changes to the Inventory:**

- Incorporated new information provided by OPALCO, shown in tables and text;
- Updated information on telecommunications services; and
- Added information on private propane utilities

OPALCO provided additional information that will be included in the SJC *Comprehensive Plan (Plan)* Section B, Element 8, Utilities. OPALCO addresses the future of energy in San Juan County, taking into account climate change, new technology, renewable energy and population growth.

**How to Comment:** Public comments are requested on the January 3, 2020, draft by **January 28, 2020**. Please submit your comments to [compplancomments@sanjuanco.com](mailto:compplancomments@sanjuanco.com) subject line: RE: Utilities inventory. Please provide your contact information for the record and identify the page and line number pertaining to the comment. If possible, provide specific alternative language. Comments may also be submitted to the SJC Department of Community Development at PO Box 947 935 Rhone Street, Friday Harbor, 98250, c/o Sophia Cassam, Planner I.

**Background:** Completing this inventory is the first step in preparing the Section B, Element 8, Utilities, 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." WAC 365-196-420 outlines next steps that will be completed in the update of the Utilities Element in Section B.8 of the SJC Comprehensive Plan:

**WAC 365-196-420 Utilities element.**

(1) Requirements. The utilities element shall contain at least the following features: 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.

(2) Recommendations for meeting requirements. Counties and cities should consider the following:

(a) The general location and capacity of existing and proposed utility facilities should be integrated with the land use element. Proposed utilities are those awaiting approval when the comprehensive plan is adopted.

(b) In consultation with serving utilities, counties and cities should prepare an analysis of the capacity needs for various utilities over the planning period, to serve the growth anticipated at the locations and densities proposed within the jurisdiction's planning area. The capacity needs analysis should include consideration of comprehensive utility plans, least-cost plans, load forecasts, and other planning efforts.

(c) The utility element should identify the general location of utility lines and facilities required to furnish anticipated capacity needs for the planning period. This should be developed in consultation with serving utilities as a part of the process of identifying lands useful for public purposes.

(d) Counties and cities should evaluate whether any utilities should be identified and classified as essential public facilities, subject in cases of siting difficulty to the separate siting process established under the comprehensive plan for such facilities.

(e) Counties and cities should evaluate whether any utility facilities within their planning area are subject to county-wide planning policies for siting public facilities of a county-wide or statewide nature.

(f) Counties and cities should include local criteria for siting utilities over the planning period, including:

(i) Consideration of whether a siting proposal is consistent with the locations and densities for growth as designated in the land use element.

(ii) Consideration of any public service obligations of the utility involved.

(iii) Evaluation of whether the siting decision will adversely affect the ability of the utility to provide service throughout its service area.

(iv) Balancing of local design considerations against articulated needs for system-wide uniformity.

(g) Counties and cities should adopt policies that call for:

(i) Joint use of transportation rights of way and utility corridors, where possible.

(ii) Timely and effective notification of interested utilities about road construction, and of maintenance and upgrades of existing roads to facilitate coordination of public and private utility trenching activities.

(iii) Consideration of utility permit applications simultaneously with the project permit application for the project proposal requesting service and, when possible, approval of utility permits when the project permit application for the project to be served is approved.

(iv) Cooperation and collaboration between the county or city and the utility provider to develop vegetation management policies and plans for utility corridors.

(A) Coordination and cooperation between the county or city and the utility provider to educate the public on avoiding preventable utility conflicts through choosing proper vegetation (i.e., "Right Tree, Right Place").

(B) Coordination and cooperation between the county or city and the utility provider to reduce potential critical areas conflicts through the consideration of alternate utility routes, expedited vegetation management permitting, coordinated vegetation management activities, and/or long-term vegetation management plans.

(h) Adjacent counties and cities should coordinate to ensure the consistency of each jurisdiction's utilities element and regional utility plan, and to develop a coordinated process for siting regional utility facilities in a timely manner.



**COMPREHENSIVE PLAN**

**Appendix 8**

**THIRD DRAFT  
UTILITIES INVENTORY  
AND EXISTING CONDITIONS**

**August 4, 2017**

**January 3, 2020**

**PAGE INTENTIONALLY  
LEFT BLANK**

**APPENDIX 8**

**DRAFT  
UTILITIES INVENTORY  
AND EXISTING CONDITIONS**

**TABLE OF CONTENTS**

**8.1 INTRODUCTION.....1**

**8.2 ELECTRICITY**

8.2.1 Existing Conditions .....1

8.2.2 Capacity Needs.....6

8.2.3 Community Solar.....6

**8.3 PROPANE.....6**

**8.4 TELECOMMUNICATIONS**

8.4.1 Data & Telephone - Fiber Optic .....6

8.4.2 Telephone – Voice over Internet Protocol (VoIP) .....7

8.4.3 Wireless – Fixed Wireless Long Term Evolution (LTE).....7

8.4.4 Wireless – Cellular.....7

8.4.5 Telephone – Plain Old Telephone Service (POTS).....8

**8.5 INTERNET & CABLE SERVICES .....8**

**8.6 COMMUNICATION SITES AND FACILITIES.....9**

**LIST OF TABLES**

Table 8.2.1 Capacity of OPALCO Electric Facilities .....3

Table 8.2.2 OPALCO Electricity Service Accounts - 2019.....5

**LIST OF MAPS**

Map 8.2.1 OPALCO Electric Facilities .....3

1 **8.1 INTRODUCTION**

2  
3 The Utilities Inventory and Existing Conditions is an appendix to the San Juan County (SJC) 2020  
4 Comprehensive Plan (Plan) Utilities Element. This document provides an inventory of utility services in San  
5 Juan County, including electricity, telecommunications, internet and cable, and communication sites and  
6 facilities. In San Juan County, private service providers supply utilities to customers. This inventory includes  
7 the providers, general locations and capacities of existing utilities where applicable. Planning for utilities aids  
8 SJC in ensuring adequate services are provided to different areas of the County, particularly as the County  
9 population increases.

10  
11 **8.2 ELECTRICITY**

12  
13 San Juan County relies on electricity generated primarily in the Pacific Northwest and transmitted to the San  
14 Juan Islands by the Bonneville Power Administration (BPA) and Puget Power. The BPA was created by  
15 Congress in 1937 to act as an agent to market power from Bonneville Dam. BPA has been designated to  
16 market power from the 29 additional federal dams located within the Northwest. The BPA does not build or  
17 own dams or power plants, but does operate the nation's largest network of long-distance high-voltage  
18 transmission lines. The BPA electricity is sold to the Orcas Power and Light Company (OPALCO) at BPA's point  
19 of delivery on Lopez Island. OPALCO is the sole electric service provider in San Juan County.

20  
21 OPALCO is a member-owned, private, non-profit Rural Utility Services (RUS) Cooperative that provides local  
22 electric service to its members in San Juan County. OPALCO was formed in 1937 and currently maintains  
23 offices in Eastsound, Friday Harbor, and on Lopez Island with headquarters in Eastsound. OPALCO is an  
24 electric distribution utility distributing power via submarine cables to members on twenty islands. OPALCO  
25 prioritizes ~~four main elements of service: price, reliability, environment/carbon footprint, and resilience.~~  
26 energy delivery that is safe, reliable, affordable, clean, and sustainable.

27  
28 **8.2.1 Existing Conditions**

29  
30 According to OPALCO, existing electric utility facilities in San Juan County have adequate capacity to serve  
31 existing loads. OPALCO maintains a comprehensive system Integrated Resource Plan to expand capacity as  
32 load growth occurs. Table 8.1.1 below, lists the location and capacities, in megawatts (MW) million volt-amps  
33 (MVA) of each substation in OPALCO's transmission network.

34  
35 **Table 8.2.1 Capacity of OPALCO Electric Facilities (2017).**

Substation	Location (Parcel Number)	Capacity (MW)
No. 1 Decatur	152232002	1
No. 2 Lopez	252634004	12
No. 3 Shaw	262844002	3.75
No. 4 Orcas	261022010	12
No. 5 Friday Harbor	351391410	12
No. 7 Roche Harbor	462441001	12
No. 8 Olga	160943003	7.5
No. 9 Thatcher	150414002	1
No. 10 Eastsound	271421004	12
No. 11 FH Grover St.	351391323	12

36 —Source: OPALCO 2017

1

**Table 8.2.1 Capacity of OPALCO Electric Facilities (2019).**

<b><u>Location</u></b>	<b><u>Base Capacity (MVA)</u></b>	<b><u>Max Capacity (MVA)</u></b>
<b><u>Shaw</u></b>	<u>5</u>	<u>5</u>
<b><u>Orcas</u></b>	<u>12</u>	<u>12</u>
<b><u>Eastsound</u></b>	<u>12</u>	<u>20</u>
<b><u>Olga</u></b>	<u>7.5</u>	<u>7.5</u>
<b><u>Lopez</u></b>	<u>12</u>	<u>16</u>
<b><u>Blakely</u></b>	<u>2.5</u>	<u>2.5</u>
<b><u>Decatur</u></b>	<u>2.5</u>	<u>2.5</u>
<b><u>Roche Harbor</u></b>	<u>12</u>	<u>22.4</u>
<b><u>Friday Harbor</u></b>	<u>12</u>	<u>22.4</u>
<b><u>Gravel Pit</u></b>	<u>12</u>	<u>20</u>

Source: OPALCO 2019

2  
3  
4

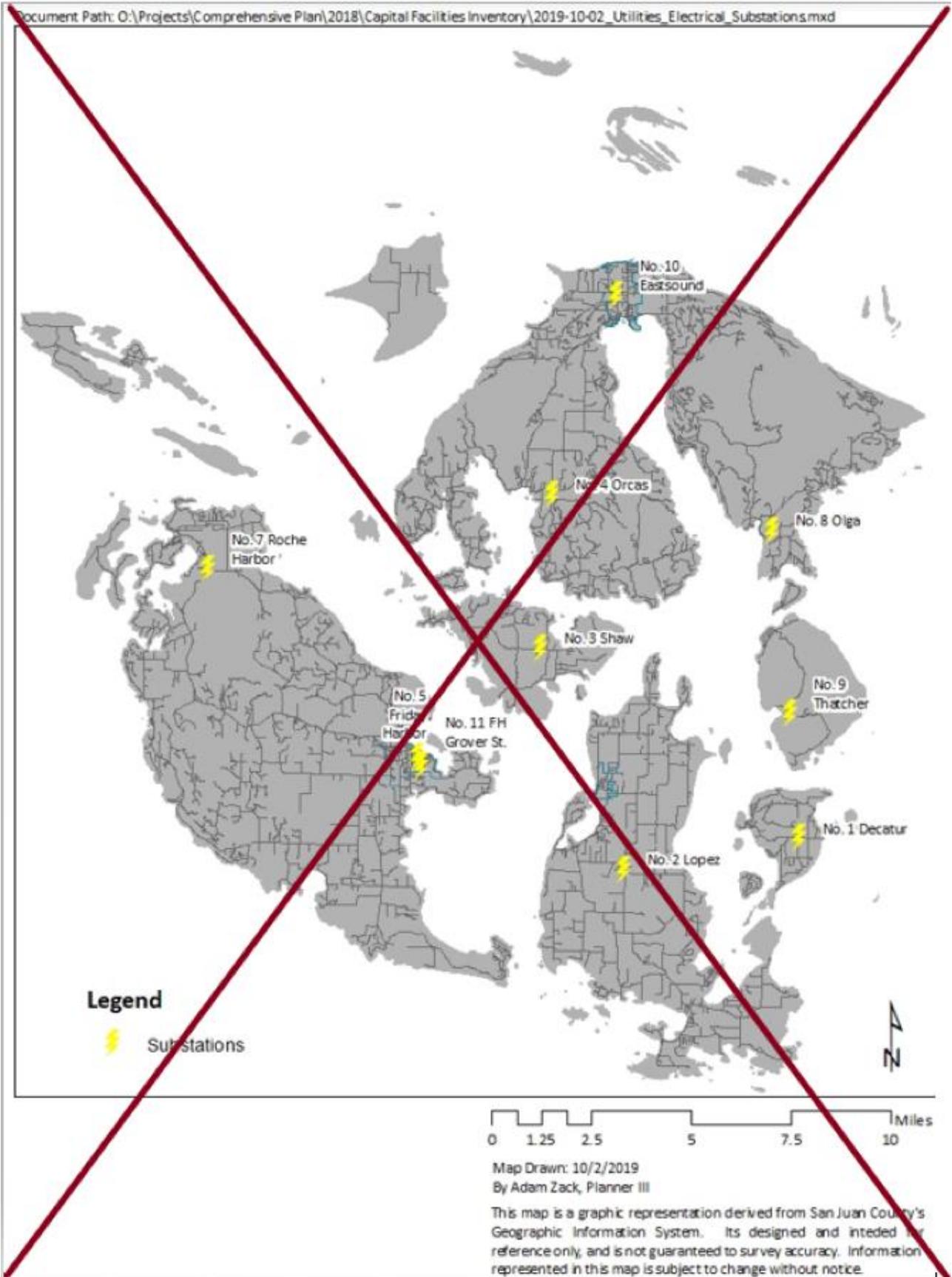
1 Map 1. OPALCO Electrical Facilities (2019).

### OPALCO Islands Served



2  
3  
4  
5  
6  
7  
8  
9

1 **Map 1. OPALCO Electrical Facilities (2019).**



2  
3

1 Table 8.2.2 below, lists the number of service accounts by island for 2017<sup>9</sup>. Additional information on  
 2 OPALCO's service territory can be found in Figure 1 of Section B – Element 8 – Utilities.  
 3

**Table 8.2.2 2017 OPALCO Accounts.**

Island	# of Accounts
San Juan (includes the Town of Friday Harbor)	6,069
Orcas	4,404
Lopez	2,386
Shaw	260
Decatur	254
Blakely	161
Center	131
Henry	88
Crane	50
Brown	47
Pearl	39
Obstruction	36
Spieden	11
Canoe	6
Big Double	3
Charles	2
Reef Point	1
Armitage	1
Bell	1
Fawn	1
<b>Total</b>	<b>13,951</b>

Source: OPALCO 2017

4  
5  
6

**Table 8.2.2 2019 OPALCO Accounts.**

Island	Number of Services
<u>Armitage</u>	<u>1</u>
<u>Bell</u>	<u>1</u>
<u>Big Double</u>	<u>3</u>
<u>Blakely</u>	<u>166</u>
<u>Brown</u>	<u>48</u>
<u>Canoe</u>	<u>6</u>
<u>Center</u>	<u>142</u>
<u>Charles</u>	<u>2</u>
<u>Crane</u>	<u>53</u>
<u>Decatur</u>	<u>279</u>
<u>Fawn</u>	<u>1</u>
<u>Henry</u>	<u>97</u>
<u>Little Double</u>	<u>1</u>
<u>Lopez</u>	<u>2,486</u>
<u>Obstruction</u>	<u>36</u>
<u>Orcas</u>	<u>4,736</u>
<u>Pearl</u>	<u>40</u>
<u>Reef Point</u>	<u>1</u>
<u>San Juan</u>	<u>6,528</u>

<u>Shaw</u>	<u>275</u>
<u>Spieden</u>	<u>11</u>
<u>Total</u>	<u>14,913</u>

Source: OPALCO 2019

## 8.2.2 Capacity Needs

An analysis of capacity development necessary to meet future demand is contained in OPALCO's long-range plan. OPALCO also develops load forecasts and construction projects in their 4-year Construction Work Plan (CWP) in addition to its long-range planning program. OPALCO is currently implementing its 2017-2020 CWP which is reviewed and updated annually as necessary. These capital-planning programs are referenced here for future comprehensive planning purposes.

Detailed analyses have been and will be conducted by OPALCO based on planned land use. Planned construction of electric utility facilities serving local load areas is based on existing and projected load rather than time (years). Utilities determine the need for expanded or new electric utility regional transmission network facilities on the basis of established planning standards that define required system performance under specified conditions including load and generation levels, equipment outages, weather, and equipment ratings. As the electric load within San Juan County grows due to an increase in customers and demand, OPALCO will need to add new electrical facilities to increase the capacity of its distribution system. OPALCO estimates an average annual increase of 0.5 percent for residential accounts and 2.0 percent for commercial accounts. Since 2007, OPALCO has increased its consumer accounts by approximately 10 percent or an increase of over 1,400 customers.

## 8.2.3 Community Solar

OPALCO operates a 500 KW solar array located on 3.6 acres at the Decatur Substation (TPN 152232002000). This is OPALCO's first Community Solar Project—a program where members offset a portion of their energy use and electric bill via credits by buying shares of a solar array OPALCO operates. Decatur Community Solar began operating in July 2018, and is expected to produce approximately 570,000 kWh/year.

## 8.3 PROPANE AND NATURAL GAS

Propane is an important energy source in San Juan County. Natural gas is not available in the County, contributing to the reliance on propane. Propane in San Juan County is provided by private suppliers, including Inter-Island Propane and San Juan Propane. Inter-Island Propane is located in Friday Harbor and on Lopez Island. They currently provide barge service to Orcas, Shaw, and to the outer islands by request. San Juan Propane is located in Friday Harbor, Eastsound, and Island Center on Lopez Island. San Juan County's involvement with propane extends only to land use issues. Safe delivery of propane from ports is a priority.

## 8.4 TELECOMMUNICATIONS (DATA & VOICE)

### 8.4.1 Data & Telephone - Fiber Optic

The availability of fiber optic based services has grown extensively throughout the county in the past decade. This is meeting the growing needs of the electric grid, emergency communications, ~~consumer residential and~~ business broadband and cell phone service. In Mid-2015, deployment of Fiber to the Home and Premise (FTTH & FTTP) began throughout the county. As of October 2019, approximately 50 percent of the County (7,500 addresses) is located within a serviceable distance (500 feet or less) of existing fiber optic facilities. Of those

1 ~~addresses, 1,800 are utilizing fiber optic service. As demand for higher bandwidth and additional~~  
2 ~~improvements are made to public infrastructure, the availability of fiber optic services will continue to grow.~~  
3 ~~Once complete, 60 percent to 70 percent of residential and business locations will have access to a direct fiber~~  
4 ~~connection by 2025.~~ The FTTP system enables homes and businesses to scale their needs up to 1Gbps (1,000  
5 Mbps) upon initial installation with the ability to go to 10Gbps (10,000 Mbps) as required. ~~Fiber is a future~~  
6 ~~proof technology that allows for unlimited potential in terms of data volume and capacity. As of July 2017,~~  
7 ~~over 1,000 locations around the county are serviced with an~~ Fiber is considered a future-proof technology  
8 that allows for massive increases in available bandwidth for generations to come. The average monthly new  
9 connection rate is 30-40 locations. The fiber is spanning 500 plus miles connecting all major islands and to  
10 the mainland with multiple upstream connections in Bellingham and Seattle.  
11

#### 12 **8.4.2 Telephone – Voice over Internet Protocol (VoIP)**

13  
14 With the increase use of data communication services, Voice over Internet Protocol (VoIP) has become the  
15 predominate method for non-wireless based voice communications around the nation, particularly for  
16 businesses. ~~VoIP services are dependent upon reliable internet connectivity to function, as most services~~  
17 ~~offerings are cloud-based.~~ VoIP services are dependent on reliable, low-latency internet connectivity. Unlike  
18 Plain Old Telephone Service (POTS) lines, the Washington Utilities and Transportation Commission (WUTC)  
19 does not regulate VoIP.  
20

21 There are various resellers of VoIP services for residents and businesses in San Jun County. Anyone with a  
22 reliable internet connection can purchase voice services from a variety of national providers. Each of these  
23 providers deliver a wide variety of services and advanced features based upon the consumer requirements.  
24

#### 25 **8.4.3 Wireless – Fixed Wireless Long Term Evolution (LTE)**

26  
27 In addition to deploying FTTH around the County, Fixed Wireless LTE ~~locations have~~ has been deployed. ~~in~~  
28 ~~areas inaccessible to a fiber connection~~ LTE has been deployed to service areas where fiber is unavailable  
29 currently. Fixed Wireless LTE utilizes cellular technology enabling high-speed data and voice connections in  
30 the range of 25Mbps to 150 Mbps. ~~As of July 2017, 1,500 locations were serviced with a future plan to serve~~  
31 ~~up to 4000-5000 locations county wide by 2020. Fixed Wireless service does enabling for the first time true~~  
32 ~~broadband in unserved and under-served areas of the county such as Stuart and Waldron Islands.~~ As of  
33 October 2019, 3,000 locations are served with fixed wireless broadband service. This service is recognized  
34 nationally as one of the top 10 fastest wireless services available to U.S. residents and the highest available  
35 offering in Washington State. Service is provided to 18 non ferry-served islands, some without utility power  
36 service. With increased capacity being added regularly, this service is available to over 4,500 locations in San  
37 Juan County.  
38

#### 39 **8.4.4 Wireless – Cellular**

40  
41 Personal wireless communication facilities are not classified as public utilities or essential services, but are a  
42 commercial service. Nationally, the Federal Communications Commission (FCC) regulates the airwaves and  
43 the personal wireless communications industry and is responsible for issuing construction permits for  
44 transmission facilities and licenses to operate wireless systems. All major national cell phone providers have  
45 a presence in San Juan County from T-Mobile, Verizon, AT&T and Sprint to smaller service providers. Overall  
46 capacity of the network with multiple new frequency bands opening enables for higher throughput and data  
47 rates. It is expected providers will expand their capacity and coverage area over time to accommodate their  
48 respective customer base.  
49

50 Local governments regulate the development of the wireless communications network by specifying where  
51 facilities can locate, applying buffering and setback requirements, etc. Federal case law from regulating

1 facilities covered by the Federal Aviation Administration (FAA) has preempted local governments. The FAA  
2 reviews the location and height of proposed support structures to prevent interference with operations of  
3 airports and flight paths. The FAA regulates proposed towers that exceed 200 feet and smaller structures  
4 located within 20,000 feet of a major airport and 10,000 feet of a general aviation airport. The FAA does not  
5 have the authority to deny an FCC construction permit, but it can cite a proposed support structure as a hazard  
6 to navigation. (See the discussion on Airport facilities in Element II-D Transportation.) In 2014, San Juan  
7 County adopted a joint use wireless ordinance enabling the broader development of wireless infrastructure  
8 for essential public services.  
9

#### 10 **8.4.5 Telephone - Plain Old Telephone Service (POTS)**

11  
12 CenturyLink, based in Monroe, Louisiana, is the primary provider of POTS (Plain Old Telephone Service), to  
13 approximately 10,000 residential and business customers in the county. The number of locations decreases  
14 as consumers discontinue landline service or port their number over to VoIP providers, such as Rock Island  
15 Communications, a subsidiary of OPALCO. In addition, CenturyLink also provides digital subscriber line (DSL)  
16 service; as well as private dedicated services (i.e. Ethernet) which helps meet the needs of telecommunication  
17 customers throughout the county.  
18

19 CenturyLink provides service to the county via a fiber optic cable network that connects all the major islands  
20 to the mainland. It provides these essential services to meet the needs of telecommuters and those who run  
21 businesses from their homes. Service is currently provided to Blakely, Brown, Center, Crane, Decatur, Henry,  
22 Lopez, Obstruction, Orcas, Pearl, San Juan and Shaw Islands.  
23

24 Geographic isolation and comparatively small resident populations have historically inhibited the extension  
25 of telephone service to some islands within the county, such as Stuart Island.  
26

### 27 **8.5 INTERNET & CABLE SERVICES**

28  
29 Fast, reliable Internet connection is increasingly important to economic development, health and safety, and  
30 daily life in San Juan County. Broadband Internet connection allows residents opportunities to work remotely  
31 and connect with others globally. Medical facilities and emergency services rely heavily on broadband Internet  
32 in order to provide modern, up-to-date care. The Economic Development Element of this Comprehensive  
33 Plan states the goal of “support[ing] development of reliable high-speed (100 Mbps or higher, or the current  
34 standard for urban regions of the U.S., whichever is higher) broadband infrastructure that enables the creation  
35 of jobs and improved educational opportunities for islanders, and increased competitiveness for the county.”  
36 Internet utility infrastructure comes in several forms, including LTE fixed wireless, fiber, and cable.  
37

38 Rock Island Communications provides broadband Internet via LTE fixed wireless and fiber in San Juan County.  
39 Rock Island is a subsidiary of OPALCO, as of 2015. Fiber connectivity is ~~currently limited, but increasing as~~  
40 ~~demand grows growing rapidly, with LTE providing service in areas awaiting fiber deployment.~~ Cable  
41 Television and Internet services have continued to see a significant decrease throughout the county with  
42 CenturyLink, Zito Media and ~~Mt. Baker Cable~~ **POGO Zone** covering parts of Friday Harbor and Orcas Island  
43 **respectively**. This decline has been driven by the consumer move to online streaming services such as Netflix,  
44 Hulu and Amazon as broadband services via fiber and wireless increase, in addition to increased competition  
45 from satellite providers.  
46  
47

1 **8.6 COMMUNICATION SITES AND FACILITIES**

2  
3 Antennae and towers atop Mt. Constitution on Orcas Island are used to provide broadcast communications  
4 and electronic controls. As telecommunications technology and demands continue to change, service  
5 providers must retain the ability to expand existing and build new antennae and towers for operational  
6 purposes.  
7

8 Mt. Constitution Sites, Inc. owns 160 acres of land within Moran State Park and leases communication towers  
9 to approximately 40 users. In all they have five towers with three primary sites ranging from 500', 400', to a  
10 235' tower, located in the northeast corner of this property.  
11

12 East of the 160-acres of private property mentioned above, the U.S. Coast Guard leases a one-acre site from  
13 the Washington State Parks and Recreation Commission (WSPRC) and operates a 100-foot tower with  
14 microwave dishes to monitor small vessels. KVOS leases a one-acre site from the WSPRC at the 2,409 summit  
15 of Mt. Constitution and operates a transmitter facility and a 150-foot tower. Washington State Department  
16 of Transportation (WSDOT) leases a one-acre site from WSPRC southwest of the KVOS site and operates two  
17 70-foot towers. The U.S. Forest Service also leases one acre from WSPRC and operates two 70-foot towers.  
18 The University of Washington also operates a seismographic telemetry station at this site. This site may, at  
19 some point, no longer be sufficient for future forms of, or demand for, personal wireless services. The county  
20 adopted Ordinance 8-1997, which established a subarea plan and requirements for future personal wireless  
21 communication service facilities through Chapter 16.80 of the SJCC.  
22  
23  
24



## Friends of the San Juans

360.378.2319

[www.sanjuans.org](http://www.sanjuans.org)

P.O. Box 1344

Friday Harbor, WA 98250

Date: October 25, 2019

Adam Zack - SJC Department of Community Development  
PO Box 947  
Friday Harbor, WA 98250  
adamz@sanjuanco.com  
cc: compplancomments@sanjuanco.com

**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,

A handwritten signature in black ink, appearing to read "Stephanie Buffum". The signature is fluid and cursive, with the first name being more prominent.

Stephanie Buffum, MURP, MPA  
Executive Director



**COMPREHENSIVE PLAN**

**Appendix 8**

**SECOND DRAFT**  
**UTILITIES INVENTORY**  
**AND EXISTING CONDITIONS**

**~~August 4, 2017~~**

**November 1, 2019**

**PAGE INTENTIONALLY  
LEFT BLANK**

**APPENDIX 8**

**DRAFT  
UTILITIES INVENTORY  
AND EXISTING CONDITIONS**

**TABLE OF CONTENTS**

<b>Section</b>	<b>Page</b>
<b>8.1 INTRODUCTION</b> .....	<b>1</b>
<b>8.2 ELECTRICITY</b>	
8.2.1 Existing Conditions .....	1
8.2.2 Capacity Needs.....	3
8.2.3 <u>Community Solar</u> .....	4
<b>8.3 TELECOMMUNICATIONS</b>	
8.3.1 Data & Telephone - Fiber Optic .....	4
8.3.2 Telephone – Voice over Internet Protocol (VoIP) .....	4
8.3.3 Wireless – Fixed Wireless Long Term Evolution (LTE).....	4
8.3.4 Wireless – Cellular.....	4
8.3.5 Telephone – Plain Old Telephone Service (POTS).....	5
<b>8.4 <u>INTERNET &amp; CABLE SERVICES</u></b> .....	<b>5</b>
<b>8.5 COMMUNICATION SITES AND FACILITIES</b> .....	<b>6</b>

**LIST OF TABLES**

Table 8.2.1 Capacity of OPALCO Electric Facilities .....	1
Table 8.2.2 OPALCO Electricity Service Accounts—2017 .....	3

**LIST OF MAPS**

<u>Map 8.2.1 OPALCO Electric Facilities</u> .....	2
---	---

<NOTE: update table above after changes below are formalized>

1 **8.1 INTRODUCTION**

2  
3 This document provides an inventory of utility services in San Juan County, including electricity,  
4 telecommunications, internet and cable, and communication sites and facilities. In San Juan County, private  
5 service providers supply utilities to customers. This inventory includes the providers, general locations and  
6 capacities of existing utilities where applicable.  
7

8 **8.2 ELECTRICITY**

9  
10 Electricity for the county is provided by Orcas Power and Light Cooperative (OPALCO). That power is sourced  
11 primarily from Northwest hydro power from the mainland. Over the next 20 years OPALCO will be producing  
12 over half of that power locally, to increase local energy resilience and moderate mainland price increases.  
13 That local power will come from a combination of solar, wind and tidal energy sources, mostly utility scale,  
14 with some member generated resources, including rooftop solar. Additionally, with the 2019 WA Clean Energy  
15 Transformation Act (CETA), mainland power capacity will likely be reduced in the coming decade, which will  
16 increase the likelihood of rolling blackouts. To mitigate outages and increase local energy resilience, OPALCO  
17 will be developing a substantial local grid battery resource capacity – both utility scale and member owned.  
18

19 OPALCO is a member-owned, private, non-profit Rural Utility Services (RUS) Cooperative that provides local  
20 electric service to its members in San Juan County. OPALCO was formed in 1937 and currently maintains  
21 offices in Eastsound, Friday Harbor, and on Lopez Island with headquarters in Eastsound. OPALCO is an electric  
22 distribution utility distributing power via submarine cables to members on twenty islands. OPALCO prioritizes  
23 delivery energy that is safe, reliable, affordable, clean, and sustainable.  
24

25 **8.2.1 Existing Conditions**

26  
27 According to OPALCO, existing electric utility facilities in San Juan County have adequate capacity to serve  
28 existing loads. OPALCO maintains a comprehensive Integrated Resource Plan to expand capacity as load  
29 growth occurs. Table 8.1.1 below, lists the location and capacities, in million volt-amps (MVA) of each  
30 substation in OPALCO's transmission network.

Location	Base Capacity (MVA)	Max Capacity (MVA)
Shaw	5	5
Orcas	12	12
Eastsound	12	20
Olga	7.5	7.5
Lopez	12	16
Blakely	2.5	2.5
Decatur	2.5	2.5
Roche Harbor	12	22.4
Friday Harbor	12	22.4
Gravel Pit	12	20

31  
32  
34 **Map 1. OPALCO Electrical Facilities (2019).**

# OPALCO Islands Served



1  
2  
3

Table 8.2.2 below, lists the number of service accounts by island for 2019.

Island	Number of Services
--------	--------------------

Armitage	1
Bell	1
Big Double	3
Blakely	166
Brown	48
Canoe	6
Center	142
Charles	2
Crane	53
Decatur	279
Fawn	1
Henry	97
Little Double	1
Lopez	2,486
Obstruction	36
Orcas	4,736
Pearl	40
Reef Point	1
San Juan	6,528
Shaw	275
Spieden	11

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

Additional information on OPALCO’s service territory can be found in Figure 1 of Section B – Element 8 – Utilities.

**8.2.2 Energy Outlook**

- **Climate impact is warming winters and summers.** At the current rate, winters will be summer-like by the end of the century. Summers will be much warmer. There is a rotation of load from winter-peaking to summer-peaking that will unfold over the coming decades. Heat load will decrease, due to warming winters and steadily growing market share of super-efficient heat pumps replacing less efficient electric resistance heating. Air conditioning load will increase, but, being heat pump based, it is inherently efficient. Snowpack is receding (more rain, less snow fall) leading to a shift of hydro flow away from summer, toward winter. This will especially challenge mainland urban areas that depend on air conditioning to stay cool during more frequent climate changed heat waves. That said, trends in local warming, though moderated by the cool surrounding Salish Sea, will become uncomfortable in summers, especially challenging our vulnerable (larger than the mainland) elder population.
- **Mainland power will become more costly and less reliable** in the coming decade as demand for firm, clean, reliable affordable hydro increases, driven by the decommissioning of coal power plants. Capacity will go down, driving energy prices up. Demand will exceed supply, leading to regional rolling blackouts and demand rate inflation during periods of peak load demand. Increasing local renewable energy resources will be an important part of the solution.

- 1 ■ **There is time to solve the problem, if we start now.** Gradual incremental deployment of cost-effective solutions reduces risk and saves money. *An ounce of prevention is worth a pound of cure.*  
2  
3 Delay would lead to unmanageable risk and rate shock. OPALCO’s near term focus is on building  
4 equity, winning grants, and incentivizing member efficiency, renewable energy and battery storage  
5 programs.
- 6 ■ OPALCO expects that **local renewable energy resources will become competitive with  
7 mainland power** wholesale electric rates around 2025 (grid parity). Solar + storage will be  
8 essential parts of our resource mix. Storage is the “Swiss Army knife” of the grid, helping firm the  
9 increasing contribution of intermittent resources like solar, helping reduce demand charges,  
10 keeping critical infrastructure and town-centers operating during outages, and much more.
- 11 ■ **Direct member investment** will be an essential part of growing our local energy resource mix.  
12 This is an especially important way to accelerate local energy resource deployment, before grid  
13 parity, without impacting rates. OPALCO’s Switch it Up! program will be used to incentivize  
14 direct member investment in over 3 MW of member battery storage, and efficiency measures  
15 including heat pumps, dispatchable water heaters, dispatchable EV chargers, and smart inverters  
16 coupled with rooftop solar.
- 17 ■ **Mainland power will remain an essential part of our resource mix**, albeit less. As we increase  
18 local energy resilience with the addition of local energy resources (member and community solar,  
19 and utility-scale solar, storage, wind and tidal), mainland energy purchases will decline to about  
20 half of total kWh consumption by 2040, depending on post grid parity investment levels. Yet, it  
21 will remain a vital resource for firming intermittent resources, powering us during cold snaps, at  
22 night and in long gray winters when solar production is limited – the ultimate “backup battery.”
- 23 ■ **Load continues to be flat** but will change in the coming decade as more members use electricity  
24 for heating and transportation. EVs are projected to reach cost parity with fossil-fueled cars in  
25 2022. EVs will be a significant driver of load growth and revenue toward the end of the 2020s.  
26 Ferry electrification will add to load in the 2030s. The increasingly transactional grid helps load  
27 and resources become more dispatchable (home battery storage, smart water heaters). This will be  
28 an essential tool in avoiding peak demand charges.
- 29 ■ **We are in the early stages of a highly transactional grid.** OPALCO has an outstanding grid that  
30 has served us well for over 80 years, more reliable than ever. As communication protocols  
31 standardize, we will see increased two-way energy and information flow, members buying and  
32 selling energy, solar + batteries increasing local energy resilience, enabled by OPALCO’s fast  
33 reliable fiber and wireless internet. OPALCO will increasingly serve as a balancing exchange,  
34 keeping voltage stable as members buy and sell energy from each other, with mainland power  
35 serving as a vital source of firm energy when local energy demand exceeds local generation  
36 capacity.
- 37 ■ **Efficiency continues to improve**, helped along by the “internet of things” (IoT) – enabled by the  
38 OPALCO/Rock Island fiber and LTE wireless broadband backbone. The “automated home”  
39 market exceeded \$23 billion in 2018 and is expected to reach \$75 billion by 2025, at an impressive  
40 compound annual growth rate of 18%. This presents encouraging impetus for helping OPALCO  
41 members make their energy use smarter and more efficient, including smart thermostats and  
42 appliances, better grid monitoring, grid control and crew information access. Heat pumps will be

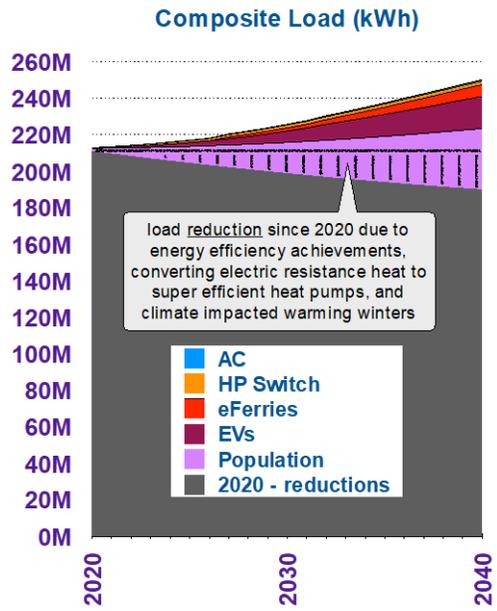
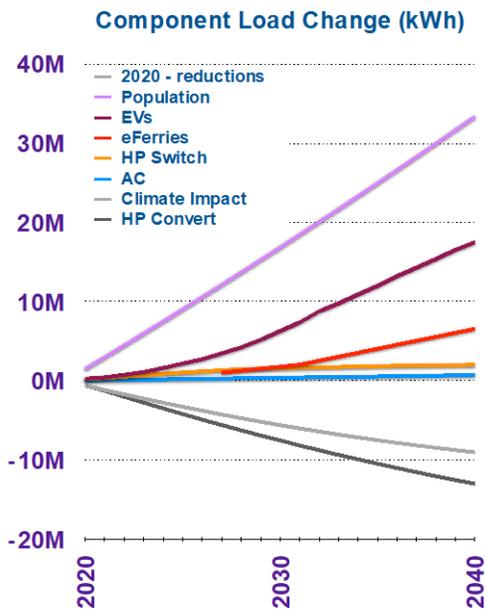
- 1 the largest reducer of load as members convert from resistance heat to super-efficient heat pumps.  
 2 Bundling fiber with smart home systems helps incentivize uptake.  
 3 The table below summarizes the resources to be developed, the purpose of those new resources,  
 4 and the investment source, before and after grid parity (the point at which local power resources  
 5 become lower cost than mainland power).

	Before Grid Parity	After Grid Parity
<b>Resources</b>	Deploy <b>moderate</b> amounts of local renewable energy resources: a combination of solar + storage + demand response, community solar, and utility-scale solar. Incentivize rooftop solar, dispatchable home storage, and demand response units.	<b>Accelerate</b> deployment of local renewable energy resources, as they become affordable, to significantly reduce our dependence on mainland power. Initially solar, eventually tidal energy, likely in the 2030s.
<b>Purpose</b>	Reduce vulnerability to mainland demand charges. Increase local energy resilience, especially for critical services in the county: first responders, town centers, government. Community solar helps members lower the cost of their electricity.	Cushion us against the increasing cost of mainland power. Increase local energy resilience.
<b>Investment Source</b>	Community solar is paid for by subscribers. Utility-scale solar is funded through grants and RESP program. Member storage and demand response is paid for through direct member investment, grants and RESP program.	Direct member investment, Grants, RESP program, and rates as a last resort.

- 6  
7



*population + EVs + eFerries + fuel switching + AC - efficiency - climate reduced heating*



2

3

1  
2 An analysis of capacity development necessary to meet future demand is contained in OPALCO's long-range  
3 plan. OPALCO also develops load forecasts and construction projects in their 4-year Construction Work Plan  
4 (CWP) in addition to its long-range planning program. OPALCO is currently implementing its 2017-2020 CWP  
5 which is reviewed and updated annually as necessary. These capital-planning programs are referenced here  
6 for future comprehensive planning purposes.

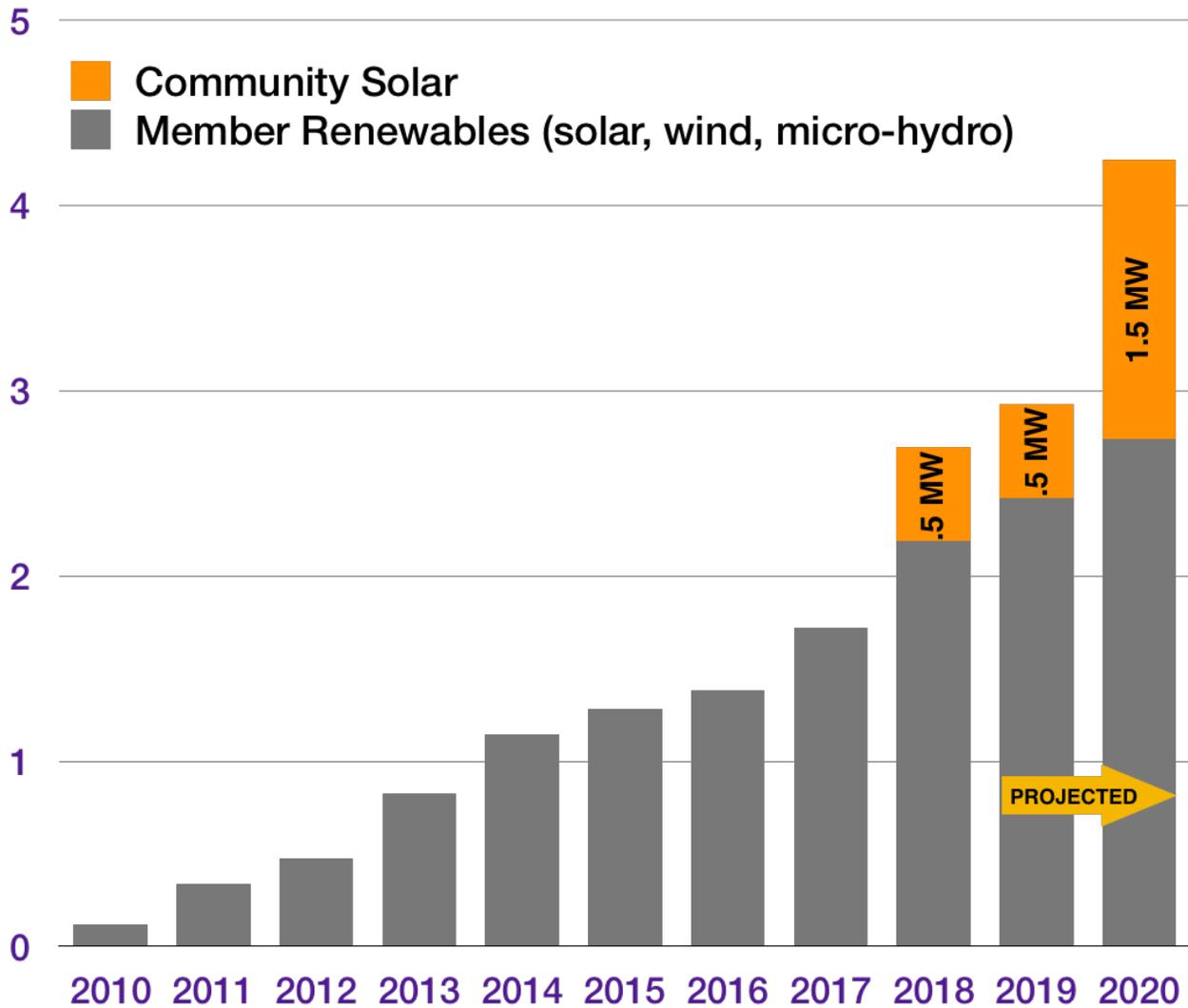
7  
8 Detailed analyses have been and will be conducted by OPALCO based on planned land use. Planned  
9 construction of electric utility facilities serving local load areas is based on existing and projected load rather  
10 than time (years). Utilities determine the need for expanded or new electric utility regional transmission  
11 network facilities on the basis of established planning standards that define required system performance  
12 under specified conditions including load and generation levels, equipment outages, weather, and equipment  
13 ratings. As the electric load within San Juan County grows due to an increase in customers and demand,  
14 OPALCO will need to add new electrical facilities to increase the capacity of its distribution system. OPALCO  
15 estimates an average annual increase of 0.7 percent for residential and commercial accounts. Since 2007,  
16 OPALCO has increased its consumer accounts by approximately 10 percent or an increase of over 1,400  
17 customers.

18  
19 **8.2.4 Local Energy Resources**

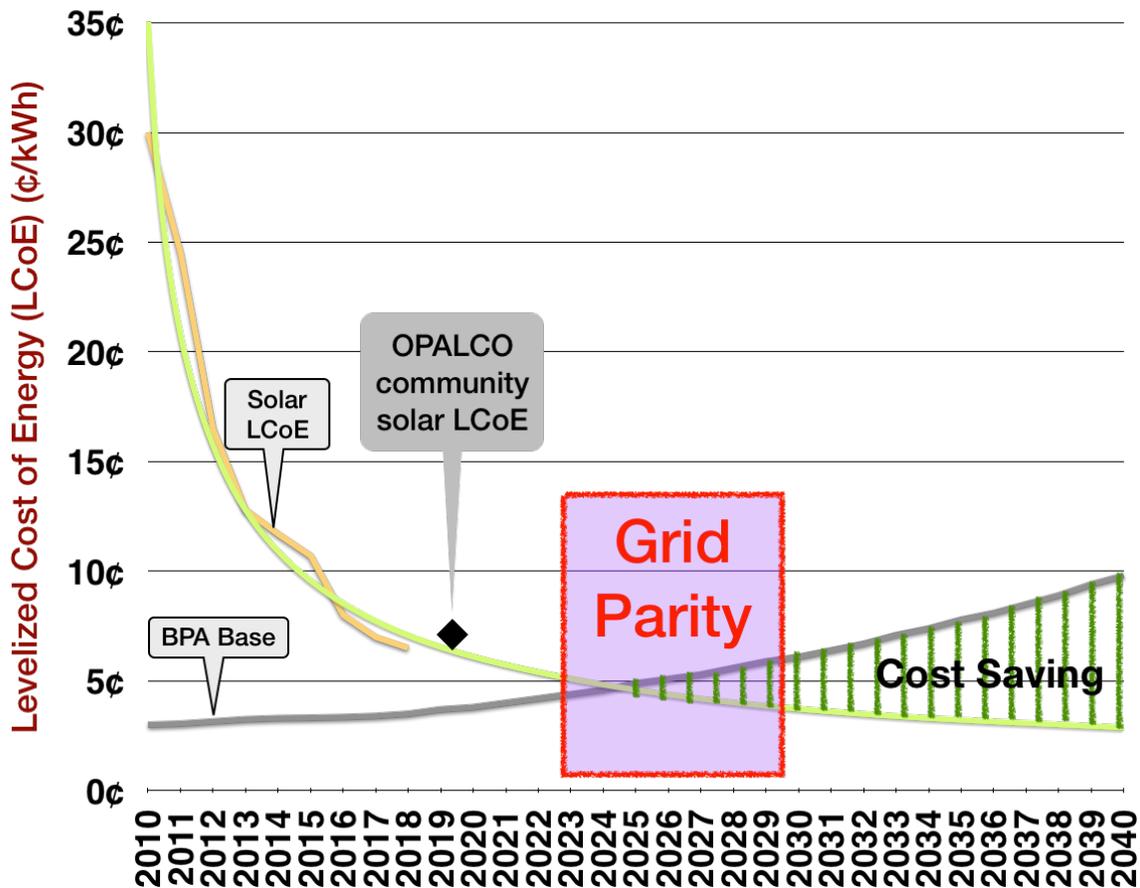
20 OPALCO operates a 500 KW solar array located on 3.6 acres at the Decatur Substation. This is OPALCO's first  
21 Community Solar Project—a program where members offset a portion of their energy use and electric bill via  
22 credits by buying shares of a solar array OPALCO operates. Decatur Community Solar began operating in July  
23 2018, and is expected to produce approximately 570,000 kWh/year.

24  
25 The chart below shows local renewable energy capacity by year with projected capacity for 2019  
26 and 2020.

# Local Renewables Capacity (MW)

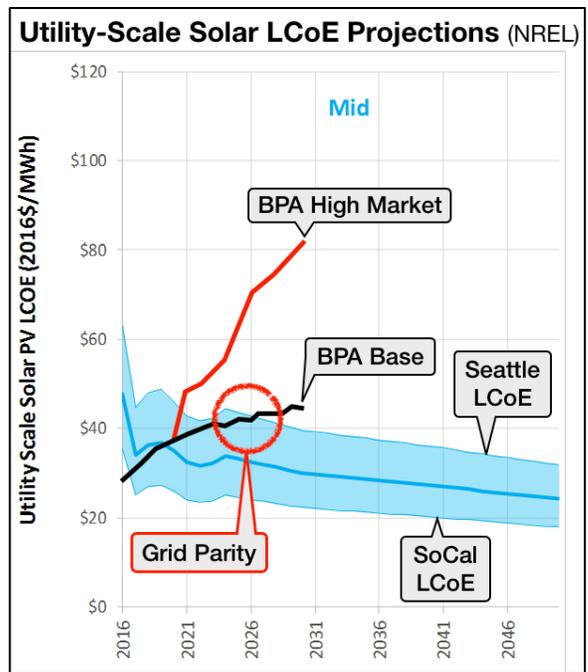


1  
2  
3 Renewable energy resource costs have been falling, while mainland pricing has been slowly rising.  
4 The point at which they cross is called **Grid Parity**. In other words, Grid Parity is the point at  
5 which an emerging technology becomes economically viable. At that point, the emerging  
6 technology has increasing cost savings compared to the legacy technology (see slide below).



1  
 2 Once a resource is at grid parity or better, it can be added into the energy portfolio to replace or  
 3 moderate the cost of legacy energy sources.

4  
 5 The chart at right shows mid-level pricing (for the  
 6 local solar equipment), through 2050. The upper  
 7 bound of the blue range is Northwest (Seattle) price  
 8 point. OPALCO has overlaid the northwest  
 9 mainland base and high market forecast. Having just  
 10 completed a 500 kW community solar array, the  
 11 pricing is more representative of larger arrays,  
 12 with their efficiencies of scale. And mainland pricing  
 13 has been running a bit above base. Given that, OPALCO  
 14 projects that utility-scale solar pricing will cross  
 15 mainland pricing around 2025 (grid parity).



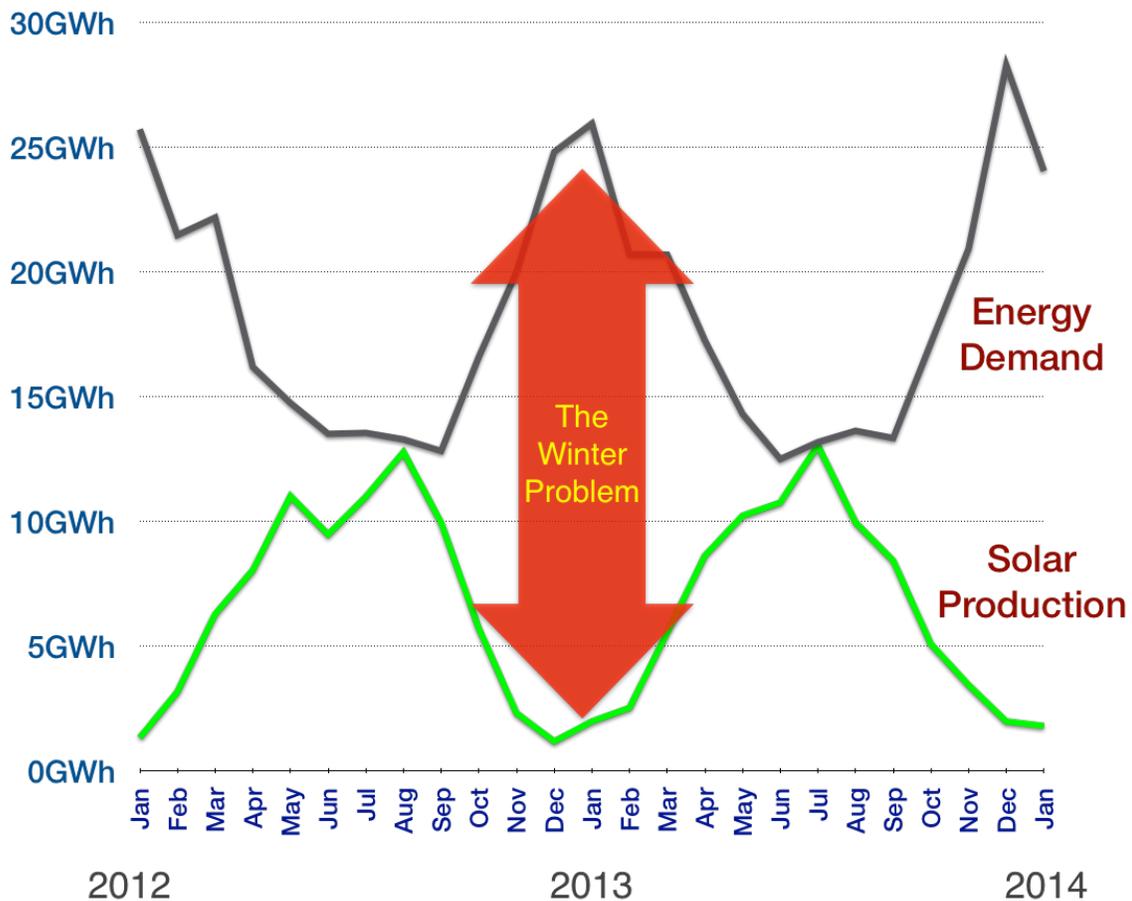
16 CETA injects additional uncertainty that can impact  
 17 the LCoE calculus, changing the path the cost of  
 18 mainland power will follow – base, or high market.  
 19 For example, CETA may require purchase of  
 20 Renewable Energy Credits (RECs), increase  
 21 administrative process to track and meet emerging

1 new clean energy requirements, and penalties for non-compliance to as yet undefined rules. This  
2 may prematurely increase the cost of mainland power.

### 3 The Winter Problem

4 San Juan County solar in summer is quite good, but in winter, output drops to one-fifth of summer  
5 output. This is known as “the winter problem.” The best year-round resource for our island region  
6 is tidal energy, but it is an emerging technology, and OPALCO doesn’t expect it to be affordable  
7 until the 2030s.

8 OPALCO rooftop solar members use the grid as their battery, generating energy in the summer,  
9 selling excess to the grid, using net metering, and buying it back in the winter when solar output  
10 is minimal. The chart below offers an example of the winter problem. Assuming each home had  
11 good sun, and had a 7.5 kW array, solar would only meet about 38% of the county electric load,  
12 due to limitations of sun in the Northwest. In winter, load doubles, but solar decreases by 80%.  
13 But, with climate change. Winters are warming and summers are too. There will be reduced need  
14 for winter heat and increased need for summer air conditioning. Snowpack is decreasing, which  
15 means less hydro flow in summer, which could mean lower hydro production and higher hydro  
16 costs in summer when big cities have increased air conditioning load. Solar can help fill the gap  
17 from reduced summer hydro. And, increasing local renewable energy such as solar, wind and tidal  
18 helps increase local energy and economic resilience.



19  
20

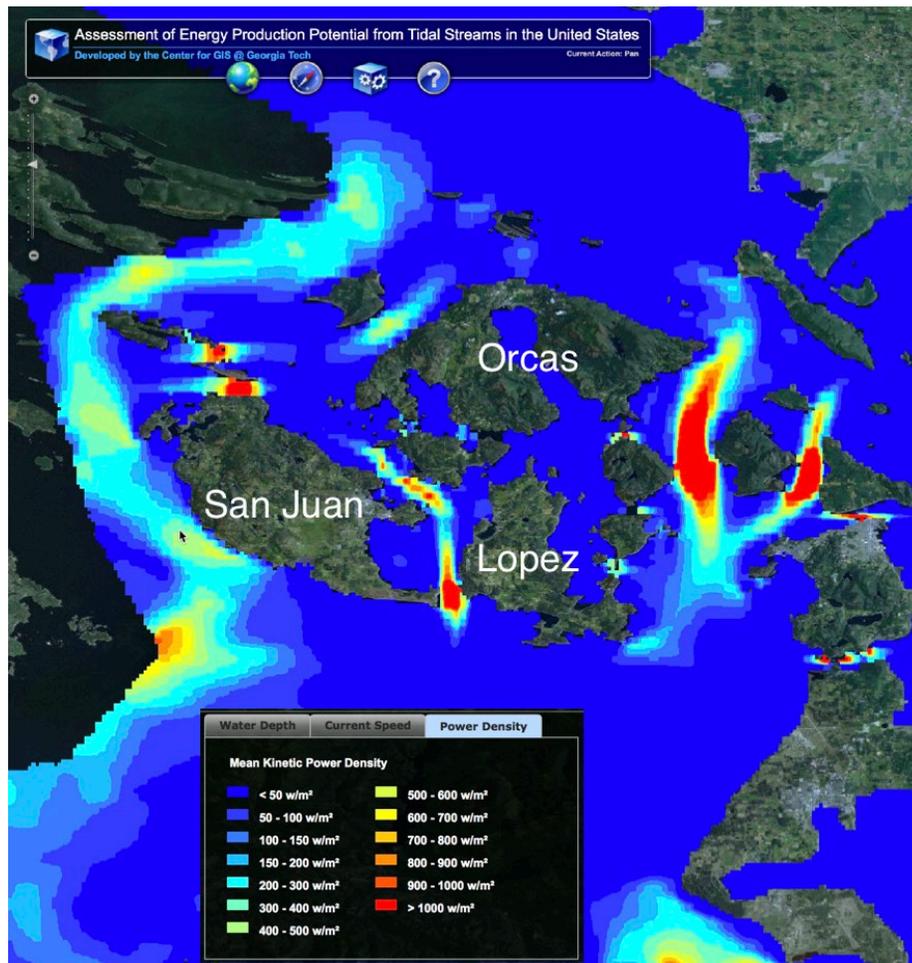
# 1 Tidal Energy

2 Tidal energy potential in San Juan County is enormous.

3 It has several features suited to our island area:

- 4 ■ In the US, just as sun is better in southern states, tidal energy is best in the northern latitudes, where
- 5 tidal flows along coastal waters move massive amounts of water back and forth about four times
- 6 each day. The chart below shows areas of strong tidal flow in red.
- 7 ■ It is predictable energy. This predictability makes the management of tidal energy much simpler
- 8 than the highly intermittent nature of solar and wind energy.
- 9 ■ Tidal energy is year-round energy, with minimal seasonality. It can help fill the solar winter gap.

10 That said, just because a resource is being used elsewhere doesn't mean that the community will  
11 support it in our territory. OPALCO has a long track record of care for our environment. Any  
12 development of tidal resources needs to be done with community support, and engagement with  
13 stakeholders, including those most involved with our sensitive marine environments such as the  
14 Friends of the San Juans and SeaDoc Society.



15  
16  
17

# 1 Biomass Energy

2 There are positive developments and interest in the county toward biomass and biochar carbon  
3 sequestration and Combined Heat and Power (CHP) production. The Orcas exchange and  
4 Conservation District are exploring grants and emerging biogasification technology to process  
5 woody biomass. This can have the beneficial side effects of:

- 6 ■ **Reduced fire risk** in a climate impacted world. Increased proactive stewardship of county forests,  
7 removing wood fall and woody biomass “fuel” from forest floors, and using it to generate energy.
- 8 ■ **Energy production**, perhaps purchased by the co-op through a Power Purchase Agreement (PPA).

9 The chart below offers an example of how biomass compares with solar.



## Example Outputs

- 200kW electric, 326kW thermal
- 5,000 operating hrs per yr (or more)
- Approx. 2.6M total kWh per year
  - 1M kWh generated electricity
  - 1.6M kWh “negawatts” – thermal energy displacing electric resistance heating
- Approx. 1,300 tons/yr (at 35% mc)

## For Reference

- 504 kW Community Solar array
- Approx. 570,000 total kWh per year

10  
11 San Juan County biologist and forestry guru Tom Schroeder, researches and writes extensively on  
12 County forests. As many have observed, and Tom notes:

13 *Trees in our local forests grow more slowly, are much shorter at every age, and*  
14 *experience challenging conditions that derive from peculiarities of local geology*  
15 *and climate.*

16 *Low timber productivity in San Juan County means that, even at culmination, the*  
17 *rate of volume growth is low. Culmination - the age at maximum timber growth - is*  
18 *also relatively delayed compared to more productive areas. In this county's forests*  
19 *culmination is at 100-120 years, whereas in forests on "good" land of grade II*  
20 *culmination is at about 50 years. For sustainability, age at culmination should be*  
21 *matched to rotation of timber harvesting, so it follows that **San Juan's forests are***

1 *being harvested 2 to 3 times too rapidly (turning over every 45 years vs 100-120*  
2 *years).*

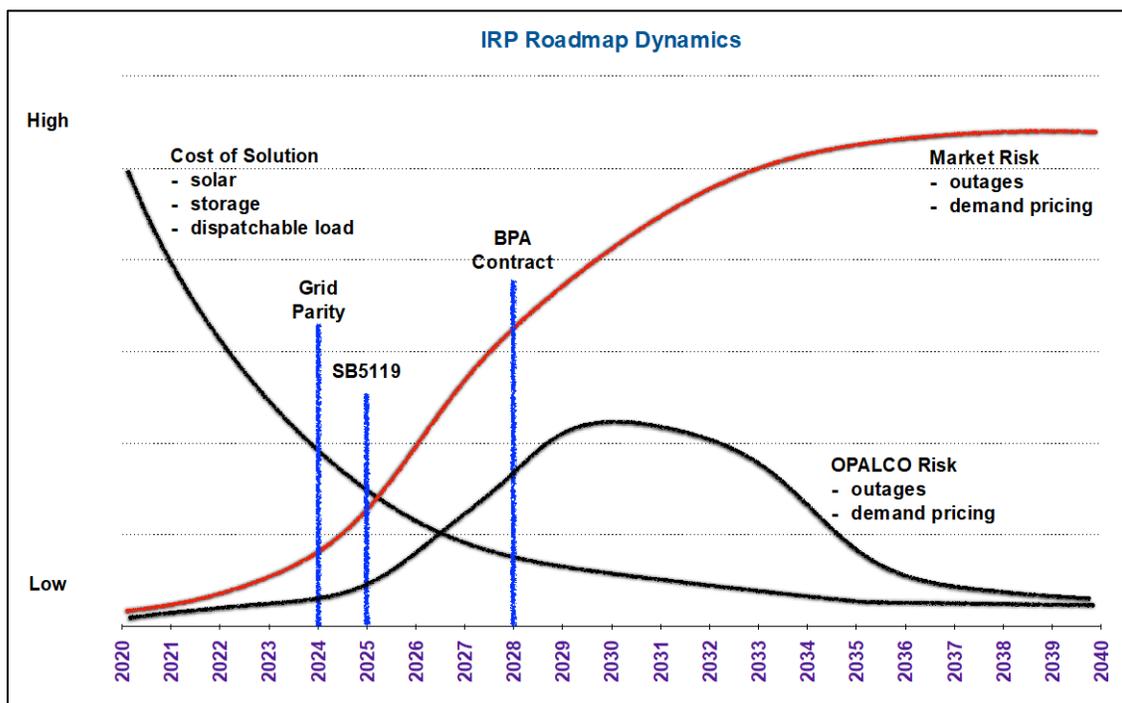
3 One estimate suggests that only about 320 to 500 of the total 70,000 acres of County forest could  
4 be harvested annually in a sustainable fashion. In the Pacific Northwest, hybrid poplar grown for  
5 saw-log production is estimated to yield up to 12 dry tons per acre of chips for energy production  
6 at the time of harvest (Stanton et al. 2002). So, 320-500 acres x 12 ODT (one dry ton) = 3,840 to  
7 6,000 tons/yr of burnable biomass. It takes from 5,600 to 8,600 ODT to generate 1 MW of power.  
8 So, about 1MW, or 5,600 tons of woody mass/yr. At best, this gives about 8,760MWh, or 4.4% of  
9 our annual 200,000 MWh demand, and more likely only 3% if you assume a 70-80% capacity  
10 factor.

11 And at the end of the day, you are releasing all that carbon, comparable to coal, into the  
12 atmosphere. Just as it has been said that much of the remaining oil and coal should be left in the  
13 ground, when it comes to burning wood, to paraphrase, “leave it on the ground” for a slower  
14 release of carbon, and nutritive benefit of the soil.

15 That said, though biomass emits carbon when burned for energy, and is considered by many a  
16 problematic source of renewable energy, biogassification systems are becoming increasingly  
17 efficient, and carbon neutral holding promise as a potential source for local energy production and  
18 fire risk mitigation.

## 19 Resource Roadmap

20 OPALCO’s resource roadmap unfolds over a very dynamic decade ahead, with grid parity  
21 expected around 2024, CETA legislation decommissioning coal plants by 2025, and negotiation  
22 of a new BPA contract by 2028. The chart below shows how trends in **local renewable energy**  
23 **resource cost**, and **mainland power reliability and cost risk** play out against these important  
24 markers.



25

1 Initially, OPALCO’s risk is lower than market risk, thanks to the contract guarantees for BPA  
 2 power. But OPALCO and BPA co-exist in a complex shared transmission system, making it  
 3 difficult to know how buffered we will be from CETA effects. As we increase our local generation  
 4 resource portfolio, especially in winter-strong tidal capacity, we expect to see that risk reduce.  
 5 Given the above dynamics, the table below summarizes a recommended roadmap for OPALCO  
 6 resource development, in four-year Capital Work Plan (CWP) increments.  
 7  
 8 Each of the following Themes, Benefits, and Actions tie back to our Mission and Strategic  
 9 Directives – safe, clean, cost-effective, reliable and sustainable energy, with a commitment to the  
 10 use of renewable resources and carbon reduction.

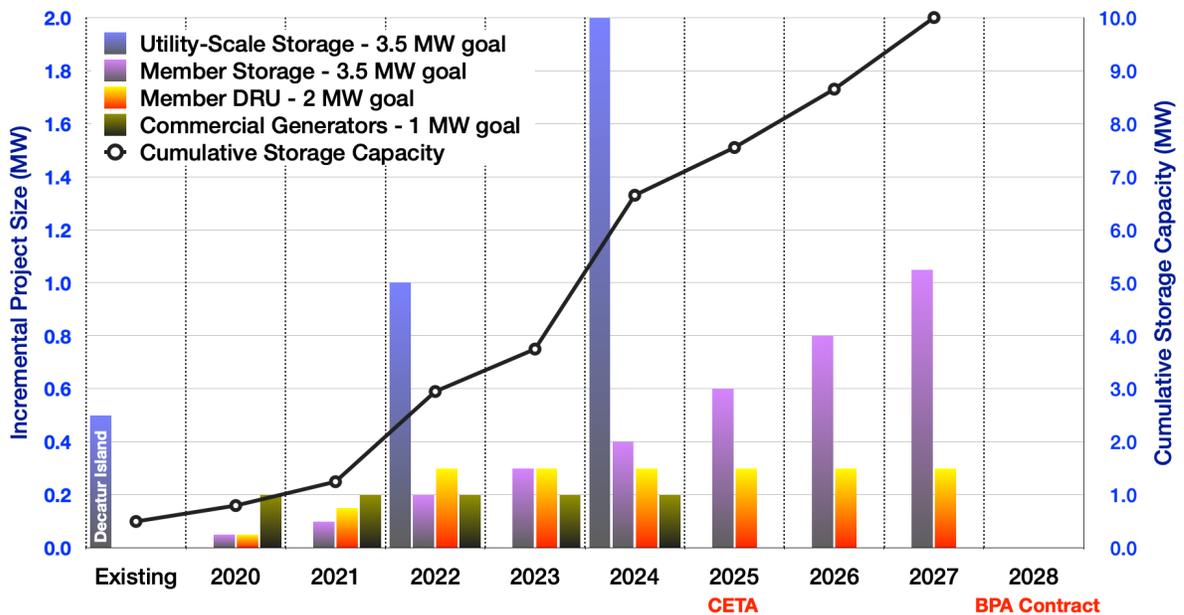
Schedule	Theme and Benefits	Actions
<b>2020 – 2024</b>  <b>CWP 1</b>	<b>Before Grid Parity + CETA Preparation</b> Increase local energy resilience at minimum cost to members through community solar subscriptions, grants and RESP funds. This helps increase local energy resilience, especially for critical services in the County: first responders, town centers, government. Community solar helps members lower the cost of their electricity Continue beneficial electrification programs.	Deploy as much community solar as members want (at least 1 MW) – funded by subscribers. Create incentives and OBF program for 3 MW dispatchable home storage - funded by grants and RESP funds. Create incentives and OBF program for 2 MW dispatchable load (water heaters) for home and business - funded by grants and RESP funds. Create incentives for dispatchable commercial member generation for peak demand mitigation. Cooperate with partners on grant-funded tidal projects that help assess potential solutions. Continue grid modernization projects (see Grid chapter below).
<b>2024 – 2028</b>  <b>CWP 2</b>	<b>At utility-scale solar Grid Parity and CETA</b> Increase local energy resilience by ramping up utility-scale solar. Cushion against the increasing cost of mainland power. <u>Rate inflation should start to flatten.</u> Continue beneficial electrification programs. More revenue helps moderate rate increases.	Deploy all cost-effective local energy resources, including solar, storage and dispatchable load solutions, funded by grants, RESP and rates. Continue grid modernization projects (see Grid chapter below). Continue tidal power collaborations, through grant funded projects.
<b>2028 - 2032</b>  <b>CWP 3</b>	<b>New BPA Contract</b> Continue deploying local energy solutions. Optimize mix of local generation with BPA as firming and gap filling. Continue beneficial electrification programs.	Continue deploying all cost-effective local energy resources, including solar, storage and dispatchable load solutions, funded by grants, RESP and rates. Continue grid modernization projects (see Grid chapter below). As tidal approaches grid parity, prepare for deployment when cost effective.

Schedule	Theme and Benefits	Actions
2032 – 2036 <b>CWP 4</b>	<b>Ramp up Tidal Power at Grid Parity</b> Switch from solar to tidal investment to strengthen winter generation resource portfolio. Further reducing dependence on mainland power and pricing. Continue beneficial electrification programs.	Funded through grants, RESP program, rates.
2036 – 2040 <b>CWP 5</b>	<b>Build Equity</b> In preparation for forthcoming submarine cable replacement projects. Continue beneficial electrification programs.	Grants, RESP program, rates.

1 **Storage Project Roadmap**

2 The roadmap below lays out a mix of dispatchable storage resources between now and 2028, with  
 3 a goal of having 10 MW of capacity by 2028. Storage helps with demand cost control, outage  
 4 mitigation, intermittent resource smoothing, and other valuable functions.

**Dispatchable Storage Capacity Project Roadmap**

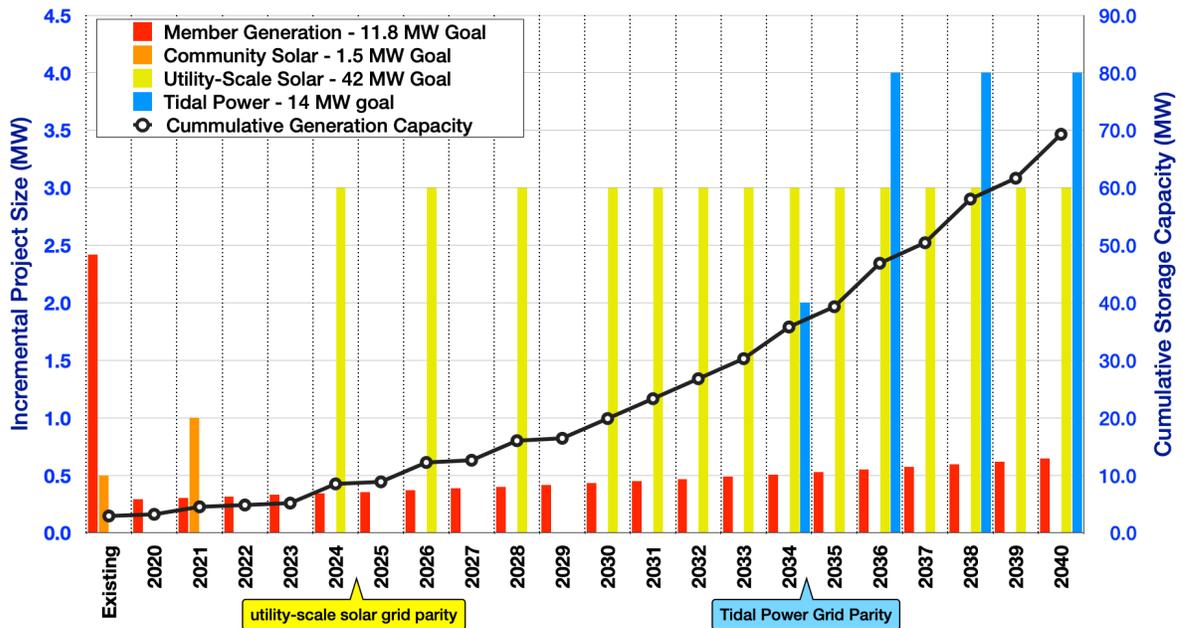


5  
6  
7

# 1 Local Renewable Generation Project Roadmap

2 The roadmap below lays out a mix of local renewable energy resources between now and 2040,  
 3 with a goal of building capacity at a steady rate once utility-scale solar hits grid parity. In the  
 4 example below, OPALCO is adding 3 MW of solar every other year, in the 2020s, and every year  
 5 in the 2030s. Once tidal cost hits grid parity, OPALCO starts with 2 MW of tidal for the first  
 6 project, ramping to 3 MW every other year, which, in this example takes us to 2040. As mentioned  
 7 above, local renewable energy resources help moderate the rising cost of mainland energy and  
 8 improve local energy resilience. With climate impact accelerating, it is possible that deployment  
 9 of local renewables might accelerate, if grant funding rises, allowing OPALCO to build more for  
 10 less.

## Local Generation Capacity Project Roadmap



11

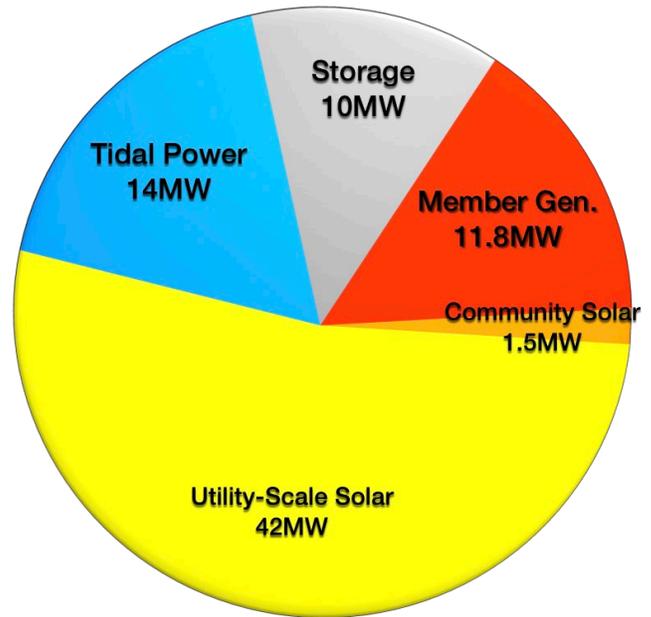
12

## 2040 Local Resource Capacity

1 The chart at right shows the resulting local  
2 resource capacity mix in 2040. It's worth  
3 remembering that as we ramp up local generation,  
4 the load on the mainland cables is reduced,  
5 extending the life of the transmission and  
6 submarine cables through congestion relief and  
7 asset deferral. That improves the cost benefit  
8 equation.

### 9 Winter, Summer, Night, Day

10 This emerging mix of local renewable energy,  
11 each resource with its own seasonal and daily  
12 productions patterns, has some remarkable  
13 implications for when we draw on mainland  
14 power. OPALCO is in the early stages of modeling  
15 this, but here are a few preliminary implications to  
16 consider:



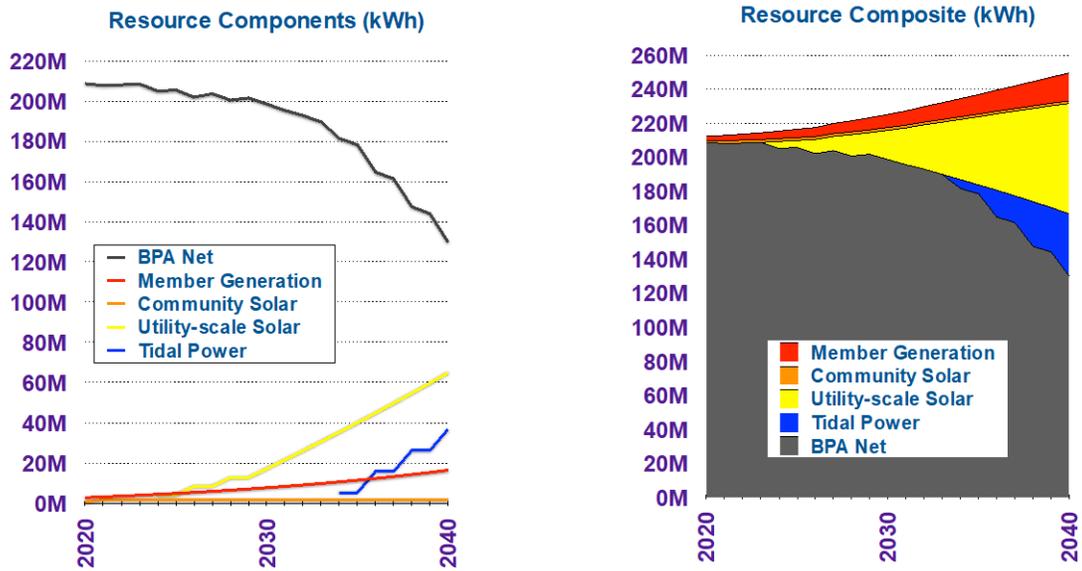
- 17 ■ 14 MW of tidal power yields 4 MW of power  
18 (30% Capacity Factor). That is day and night, winter and summer.
- 19 ■ 55 MW of local solar (member + community + utility), yields 8 MW of power (15% Capacity  
20 Factor). That is daytime only in summer. In winter solar is daytime only, and 20% of summer –  
21 1.6 MW.
- 22 ■ Summer load in 2040 is forecast to typically be 17 MW. So, summer daytime load will be mostly  
23 met by local generation. Summer nights tidal is still generating, but we will need more mainland  
24 power. In summer, mainland power daytime rates may be expensive due to climate heating,  
25 increased demand for air conditioning, and reduced hydro flow due to reduced snowpack.
- 26 ■ Winter load in 2040 is forecast to typically be 23 MW. So, winter daytime load will be mostly met  
27 by mainland generation. Daytime will have about 1.6 MW of solar on the occasional sunny day.  
28 Day and night will have about 4 MW of tidal. That gives us about 5.6 MW of local energy, leaving  
29 about 17 MW need from the mainland. In winter, mainland power daytime, and especially  
30 nighttime rates may be less expensive than summer, with warming winters, reduced heat load, and  
31 a shift in hydro from summer to winter as snow decreases, and winter rains increase, increasing  
32 winter hydro flow.

33 Given the roadmap above, the chart below shows the energy production over time as we ramp up  
34 the local energy resource mix. The left chart breaks out the component energy resources in the  
35 mix. The right chart shows the combination of the components.

36

## BPA + Local Generation Energy Forecast

*BPA + Member Generation (solar, wind, micro-hydro) + Community Solar + Utility-scale Solar + Tidal*



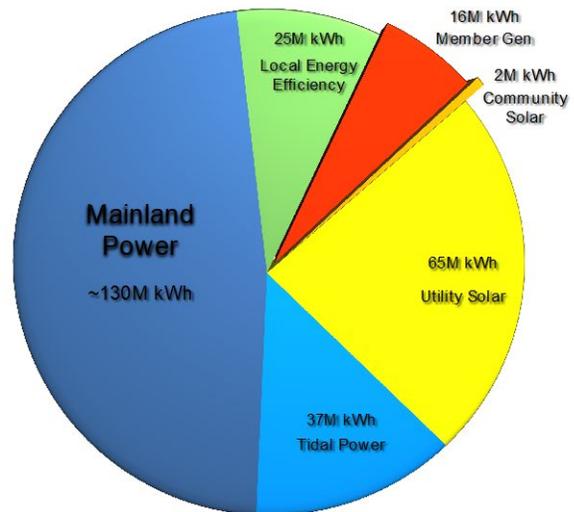
- 1
- 2 The chart below shows the energy production mix for 2040 compared to 2020. It is worth noting
- 3 that 52% of the energy is still coming from the mainland in this example. The 2040 resource mix
- 4 requires a steady aggressive resource development commitment. There are a number of challenges
- 5 behind this, including securing and permitting adequate siting for local solar, tidal, wind and other
- 6 resources.

### Energy Resource Mix

**2020 Energy Mix**



**2040 Energy Mix**



- 7
- 8 OPALC will be exploring low and high cases in their Long Range Plan, in 2020. There are two
- 9 drivers they want to explore as we model high and low business cases.

- 1 ■ **CETA** drives investment in storage to mitigate demand and outages – a form of insurance. How  
2 much storage do we want to roll out to mitigate CETA exposure? And there are beneficial side-  
3 effects of have that storage for the many use cases storage offers?
- 4 ■ **EVs** load increases revenue using existing infrastructure – no new capital needed to handle the  
5 increasing load. That new revenue helps moderate rates. EV market share has been accelerating.  
6 Will it continue, especially given the current political climate in Washington, DC aimed at slowing  
7 climate action, clean energy incentives, etc?
- 8

## 1 Right of Way (ROW) and Essential Public Facilities

2 With climate impact, there is rising risk of extreme wind and fire, as evidenced by recent wildfires  
3 in California. It is increasingly important to maintain clear right of way around utility high voltage  
4 electric distribution and transmission systems. Much of San Juan County is heavily forested, with  
5 electric aerial cables threading their way through those forests. With increased fire risk and tree fall in  
6 heavy winds, it is therefore important to ensure adequate clearance between electric facilities and  
7 nearby vegetation. The county needs to maintain their roadside rights of way for joint franchise  
8 use, to ensure easy safe access by public utilities and assistance in clearance to overhead high  
9 voltage lines.

10 With mainland power capacity likely to be reduced in coming decades, leading to potentially  
11 increasingly unreliable mainland electric service, development of substantial local energy  
12 resources is essential. The NW Power and Conservation Council estimates there is a 30-50 percent  
13 chance of a major outage in the next 10 years.

14 The problem is two-fold: The mainland is reducing capacity, and there is no plan or funding to  
15 replace that capacity. The table below summarizes the actions that are underway that will impact  
16 regional power capacity, and the impact/reaction that reduction will have. Reduced mainland  
17 capacity will necessitate development of local energy resources to mitigate mainland challenges.  
18 This is discussed in the Energy Resources section below.

Action	Reaction
<ul style="list-style-type: none"><li>• Increased hunger for climate friendly hydro, especially in California</li><li>• CETA</li><li>• Decommissioning coal/nuke plants</li><li>• Potential dam removal</li></ul>	<ul style="list-style-type: none"><li>• <b>Reducing Capacity</b></li><li>• <b>Demand Charge increases</b></li><li>• <b>Energy cost increases</b></li><li>• <b>Brownouts</b></li><li>• <b>Rolling Blackouts</b></li></ul>

19  
20 Reduced capacity and the attendant impact will lead to increased costs for OPALCO and their  
21 members. There are two kinds of cost:

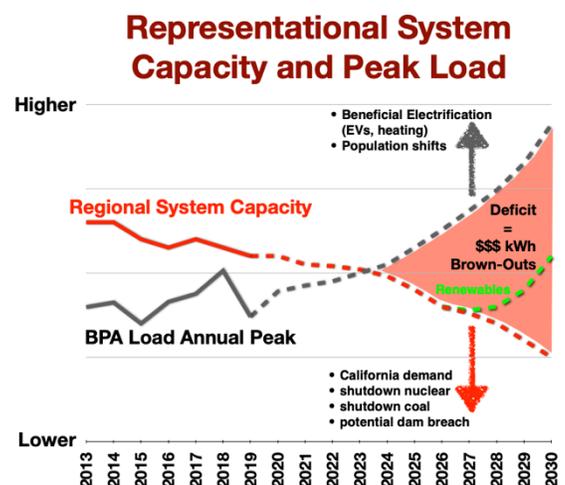
22 ■ **Direct** Cost of Power – energy cost and demand charges

23 ■ **Indirect** Cost of Outages

24 The potential impact of capacity shortages on cost of  
25 power are shown at right, representationally. The  
26 regional capacity is falling, while load is increasing  
27 and accelerating as beneficial electrification hits its  
28 stride in the mid-2020s.

29 The development of new local and regional  
30 renewables can mitigate outages, but it will take time  
31 to implement an adequate capacity to balance  
32 losses.

33 Which brings us to the indirect costs. As the potential  
34 for outages and brownouts increase, there is an  
35 associated interruption cost. Using the Department



1 of Energy Interruption Cost Estimator (ICE) to calculate the cost, the table below summarizes the  
 2 results for residential and commercial members in the OPALCO service area. The column at right  
 3 shows the value of improving reliability by 30%, for a total of about \$38 million over a 25 year  
 4 improvement asset life.

Members	Meters	Typical Outage Event Cost	Value of 30% Reliability Improvements
Residential	13,200	\$217,957	\$1,030,287
Commercial	1,900	\$6,381,580	\$37,326,937
<b>Total</b>	15,100	\$6,599,538	\$38,357,224
<b>Notes</b>	Typical February outage event: <b>SAIFI = 1.74</b> <b>SAIDI = 358</b>		Project start: 2020 Inflation: 2% Asset Life: 25 yrs Discount Rate: 6% <b>SAIFI = 1.4</b> <b>SAIDI = 240</b>

5 As OPALCO responds to the emerging risk of capacity shortfalls, they are attempting to thread  
 6 the needle by scaling investments to mitigate increasing risk associated with inaction. Rolling  
 7 blackouts will have a galvanizing effect on members, helping them realize the seriousness of the  
 8 problem. But we risk losing the trust of the public. The more we can anticipate the outage risk,  
 9 communicate the urgency of the problem, and make the investments to mitigate risk, the less the  
 10 impact on the co-op and members. Development of multi-megawatts of these essential local  
 11 resources such as solar and tidal will present significant siting challenges. It is estimated that solar  
 12 alone would require hundreds of acres alone. These new local electric facilities are Essential Public  
 13 Facilities that protect the local economy, reducing risk and economic loss during outages and  
 14 natural disasters.

15  
 16  
 17  
 18  
 19  
 20  
 21  
 22

23 **8.3 TELECOMMUNICATIONS (DATA & VOICE)**

24  
 25 **8.3.1 Data & Telephone - Fiber Optic**

26  
 27 The availability of fiber optic based services has grown extensively throughout the county in the past decade.  
 28 This is meeting the growing needs of the electric grid, emergency communications, residential and business  
 29 broadband and cell phone service. In Mid-2015, deployment of Fiber to the Home and Premise (FTTH & FTTP)  
 30 began throughout the county. As of Oct 2019, approximately 50% of the county (7,500 addresses) is within a  
 31 serviceable distance (500') of existing fiber optic facilities. Of those addresses, 1,800 are utilizing fiber optic  
 32 service. As demand for higher bandwidth and additional improvements are made to public infrastructure, the  
 33 availability of fiber optic services will continue to grow. FTTP enables homes and businesses to scale their

1 needs up to 1Gbps (1,000 Mbps) upon initial installation with the ability to go to 10Gbps (10,000 Mbps) as  
2 required. Fiber is considered a future-proof technology that allows for massive increases in available  
3 bandwidth for generations to come. The average monthly new connection rate is 30-40 locations. The fiber  
4 is spanning 500 plus miles connecting all major islands and to the mainland with multiple upstream  
5 connections in Bellingham and Seattle.  
6

### 7 **8.3.2 Telephone – Voice over Internet Protocol (VoIP)**

8

9 With the increase use of data communication services, Voice over Internet Protocol (VoIP) has become the  
10 predominate method for non-wireless based voice communications around the nation, particularly for  
11 businesses. VoIP services are dependent on reliable, low-latency internet connectivity. Unlike Plain Old  
12 Telephone Service (POTS) lines, the Washington Utilities and Transportation Commission (WUTC) does not  
13 regulate VoIP.  
14

15 There are various resellers of VoIP services for residents and businesses in San Jun County. Anyone with a  
16 reliable internet connection can purchase voice services from a variety of national providers. Each of these  
17 providers deliver a wide variety of services and advanced features based upon the consumer requirements.  
18

### 19 **8.3.3 Wireless – Fixed Wireless Long Term Evolution (LTE)**

20

21 In addition to deploying FTTH around the county, LTE locations have been deployed to service areas where  
22 fiber is unavailable currently. Fixed Wireless LTE utilizes cellular technology enabling high-speed data and  
23 voice connections in the range of 25Mbps to 150 Mbps. As of Oct 2019, 3,000 locations were serviced with  
24 fixed wireless broadband service recognized nationally as one of the top 10 fastest wireless services available  
25 to U.S. residents and the highest available offering in Washington State. This includes service to 18 non ferry-  
26 served islands, some without utility power service. With increased capacity being added regularly, this service  
27 is available to over 4,500 locations in San Juan County..  
28

### 29 **8.3.4 Wireless – Cellular**

30

31 Personal wireless communication facilities are not classified as public utilities or essential services, but are a  
32 commercial service. Nationally, the Federal Communications Commission (FCC) regulates the airwaves and  
33 the personal wireless communications industry and is responsible for issuing construction permits for  
34 transmission facilities and licenses to operate wireless systems. All major national cell phone providers have  
35 a presence in San Juan County from T-Mobile, Verizon, AT&T and Sprint to smaller service providers. Overall  
36 capacity of the network with multiple new frequency bands opening enables for higher throughput and data  
37 rates. It is expected providers will expand their capacity and coverage area over time to accommodate their  
38 respective customer base.  
39

40 Local governments regulate the development of the wireless communications network by specifying where  
41 facilities can locate, applying buffering and setback requirements, etc. Federal case law from regulating  
42 facilities covered by the Federal Aviation Administration (FAA) has preempted local governments. The FAA  
43 reviews the location and height of proposed support structures to prevent interference with operations of  
44 airports and flight paths. The FAA regulates proposed towers that exceed 200 feet and smaller structures  
45 located within 20,000 feet of a major airport and 10,000 feet of a general aviation airport. The FAA does not  
46 have the authority to deny an FCC construction permit, but it can cite a proposed support structure as a hazard  
47 to navigation. (See the discussion on Airport facilities in Element II-D Transportation.) In 2014, San Juan  
48 County adopted a joint use wireless ordinance enabling the broader development of wireless infrastructure  
49 for essential public services.  
50

### 51 **8.3.5 Telephone - Plain Old Telephone Service (POTS)**

1  
2 CenturyLink, based in Monroe, Louisiana, is the primary provider of POTS (Plain Old Telephone Service), to  
3 approximately 10,000 residential and business customers in the county. The number of locations decreases  
4 as consumers discontinue landline service or port their number over to VoIP providers such as Rock Island  
5 Communications, a subsidiary of OPALCO. In addition, CenturyLink also provides digital subscriber line (DSL)  
6 service; as well as private dedicated services (i.e. Ethernet) which helps meet the needs of telecommunication  
7 customers throughout the county.

8  
9 CenturyLink provides service to the county via a fiber optic cable network that connects all the major islands  
10 to the mainland. It provides these essential services to meet the needs of telecommuters and those who run  
11 businesses from their homes. Service is currently provided to Blakely, Brown, Center, Crane, Decatur, Henry,  
12 Lopez, Obstruction, Orcas, Pearl, San Juan and Shaw Islands.

13  
14 Geographic isolation and comparatively small resident populations have historically inhibited the extension  
15 of telephone service to some islands within the county, such as Stuart Island.

#### 16 17 **8.4 INTERNET & CABLE SERVICES**

18 Fast, reliable Internet connection is increasingly important to economic development, health and safety, and  
19 daily life in San Juan County. Broadband Internet connection allows residents opportunities to work remotely  
20 and connect with others globally. Medical facilities and emergency services rely heavily on broadband Internet  
21 in order to provide modern, up-to-date care. The Economic Development Element of this Comprehensive  
22 Plan states the goal of “support[ing] development of reliable high-speed (100 Mbps or higher, or the current  
23 standard for urban regions of the U.S., whichever is higher) broadband infrastructure that enables the creation  
24 of jobs and improved educational opportunities for islanders, and increased competitiveness for the county.”  
25 Internet utility infrastructure comes in several forms, including LTE fixed wireless, fiber, and cable.

26 Rock Island Communications provides broadband Internet via LTE fixed wireless and fiber in San Juan County.  
27 Rock Island is a subsidiary of OPALCO, as of 2015. Fiber connectivity is growing rapidly, with LTE providing  
28 service in areas awaiting fiber deployment. Cable Television and Internet services have continued to see a  
29 significant decrease throughout the county with CenturyLink, Zito Media and POGO Zone which operates the  
30 old cable tv facilities covering parts of Friday Harbor and Orcas Island. This decline has been driven by the  
31 consumer move to online streaming services such as Netflix, Hulu and Amazon as broadband services via fiber  
32 and wireless increase, in addition to increased competition from satellite providers.

#### 33 34 35 36 **8.5 COMMUNICATION SITES AND FACILITIES**

37  
38 Antennae and towers atop Mt. Constitution on Orcas Island are used to provide broadcast communications  
39 and electronic controls. As telecommunications technology and demands continue to change, service  
40 providers must retain the ability to expand existing and build new antennae and towers for operational  
41 purposes.

42  
43 Mt. Constitution Sites, Inc. owns 160 acres of land within Moran State Park and leases communication towers  
44 to approximately 40 users. In all they have five towers with three primary sites ranging from 500', 400', to a  
45 235' tower, located in the northeast corner of this property.

46  
47 East of the 160-acres of private property mentioned above, the U.S. Coast Guard leases a one-acre site from  
48 the Washington State Parks and Recreation Commission (WSPRC) and operates a 100-foot tower with  
49 microwave dishes to monitor small vessels. KVOS leases a one-acre site from the WSPRC at the 2,409 summit

1 of Mt. Constitution and operates a transmitter facility and a 150-foot tower. Washington State Department  
2 of Transportation (WSDOT) leases a one-acre site from WSPRC southwest of the KVOS site and operates two  
3 70-foot towers. The U.S. Forest Service also leases one acre from WSPRC and operates two 70-foot towers.  
4 The University of Washington also operates a seismographic telemetry station at this site. This site may, at  
5 some point, no longer be sufficient for future forms of, or demand for, personal wireless services. The county  
6 adopted Ordinance 8-1997, which established a subarea plan and requirements for future personal wireless  
7 communication service facilities through Chapter 16.80 of the SJCC.

8  
9 **[INSERT MAP OF TOWERS HERE—COMING FROM GIS]**  
10 <OPALCO recommends limiting location of utility assets, to minimize vulnerability from  
11 domestic and foreign terrorism. Energy and communication infrastructure is expected to be  
12 a prime target of attack>  
13