



Friends *of the* San Juans

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TO: San Juan County CDP and Planning Commission

FROM: Tina Whitman, Friends of the San Juans

DATE: March 18, 2020

SUBJECT: Transportation element comments

Friends of the San Juans has reviewed the February 10, 2020 Comprehensive Plan-Transportation Element Briefing and offers the following broad scale comments as well as specific recommended edits for your consideration.

Broad scale comments:

Barge Landings: FSJ is concerned about the proposal to eliminate the Level of Service (LOS) standards in 6.4.C Policies for County Marine Facilities, especially with regard to barge landing sites. CDP has multiple versions of working lists that include over 400 barge landing sites. While it is likely not the intent of SJC that all of those sites become marine transportation facilities, the potential future use of the extensive list of identified barge landing sites would benefit from a more robust public process that balances the need for barge landing sites with their possible environmental, aesthetic, and other impacts (see 6.2.C General Level of Service (LOS) Goal and Policies (page 11) 2.).

Increased vessel traffic and associated facilities: FSJ is also concerned about the strong support given in multiple places within this policy document to the expansion of private ferry service. We question if this policy has broad community support or is consistent with the guiding vision. If such expansions are to be considered (our recommended wordage as opposed to supported), related language on goals and policies must include the evaluation of impacts from increased vessel traffic through our waters, including impacts to SRKW and from the waterfront and shoreline facility expansions that would be required; as well as the identification of appropriate mitigations to support the expansion of vessel traffic.

Climate change mitigation and adaptation: FSJ strongly supports the addition of climate mitigation and adaptation policies in multiple places in this transportation planning document. However, there are a few areas where we recommend additional refinement of text as well as additional articulation of goals. These relate to 1) clarifying that transportation facilities will be facing both flood and erosion hazards in addition to storm surge and, more significantly, 2) recognition of both the threat that coastal infrastructure poses to shoreline habitats, species and processes as well as the significant opportunity for ecosystem and salmon restoration that can be facilitated through the adoption of policies that emphasize consideration of community and environmental resilience, not just the reduction of costs or impacts to infrastructure.

Specific comments:

6.2 GENERAL TRANSPORTATION GOALS AND POLICIES

Pg 5 line 16 FSJ supports the addition of environmentally responsible to 6.2.A.1

Pg 5 line 22 FSJ supports the addition of the complete streets principles in 6.2.A.2

Pg 6 line 5 FSJ questions the removal of 6.2.A.3 (f) as the complete streets language included above appears to be limited to the activity centers and ugas. Non-motorized transportation options for rural areas do not seem to be addressed anywhere else in this document.

Pg 6 line 18 FSJ supports the addition of greenhouse gas emissions reductions to 6.2.A.3.(i)

Pg 6 line 27 FSJ supports the addition of an adaptation planning specific policy in 6.2.A.4. We recommend the following text change:

To establish an adaptation planning process to increase community and environmental resilience to climate change while maintaining or modifying essential services.

Pg 7 line 4 As discussed above under broad scale comments, FSJ recommends the addition of clear policy language regarding addressing the impacts of increased vessel traffic (oil spill, noise for SRKW, etc) and the expansion of shore-based facilities that these would likely require. Suggested edits: Replace identify, develop and implement with consider and also add text on impact assessment.

Consider cross-border transportation routes, in addition to those established by Washington State Ferry Service Ferries, including an analysis of the environmental impacts of associated increases in vessel traffic and shoreline facility construction.

pg 7 line 7 FSJ supports the addition of #8 to address climate change. We suggest the following addition to capture the opportunities provided by adaptation in addition to damage reduction:

Evaluate transportation system vulnerabilities to climate change and define adaptive strategies to reduce damage and maintenance and promote environmental and community resilience.

pg 7 line 12 & 15. FSJ supports the addition of number 10 and #11 and suggest the addition of #12 to this section to include a habitat and coastal systems resiliency goal/objective to this section (6..2.A.13) on climate planning.

#12 Consider opportunities to improve community and environmental resiliency and restore coastal habitats and processes during maintenance or construction of transportation facilities.

6.2.B transportation finance

Pg 11 line 13 FSJ supports the addition of #8 dedicating a portion of lodging tax money to clean transportation initiatives.

Pg 13 line 8 FSJ recommends adding current level of risk in addition to future potential risk associated with hazardous materials spills.

Support strategies that address the current as well as increased risk of major fossil fuels and/or material spills that could occur with increases in transport vessel traffic.

Pg 15 Section 6.4 Marine Transportation Goals and Policies

- FSJ recommends that the county add an objective about environmentally responsible review, development and maintenance of marine facilities to this section.
- FSJ also recommends that the county address differently the extensive list of over 400 barge landing sites. This topic needs additional clarification, public process and detail as these lists are the result of a process from over a decade ago that ended with a recommendation for an environmental impact statement that was never conducted.
- FSJ recommends adding a policy in this section that specifically addresses vessel noise and other impacts of increased vessel traffic such as oil spill.

Pg 15 line 43 FSJ supports community docks on outer islands and recommends the addition of policy that clearly states that one objective of community docks is to reduce the proliferation of private docks.

Pg 15 line 40 # 8. FSJ questions the level of community support for this added policy objective to increase marine traffic to Lopez and Eastsound. We recommend changing increase to considering or evaluating options as well as the addition of objectives for the responsible siting and designing for any associated new facilities and studying the impacts of increased vessel traffic. This is especially important for northern East Sound, where significant, highly sensitive, at-risk archaeological and natural resources (one of four remaining herring spawning grounds in the county, commercial shellfish beds) exist but the waterfront near Lopez Village is also quite challenging in terms of feasibility of siting facilities as well as avoiding impacts.

To evaluate potential for increased marine traffic to the Eastsound Urban Growth Area and the Lopez Village Urban Growth Area and evaluation of associated impacts.

6.4.a general policies

Pg 16 lines 13 promotion of new private ferries. FSJ questions the level of community support for this policy and recommends changing encourage to consider as well as the addition of language on the need for studies on the impacts of increased vessel traffic including impacts to southern resident orca as well as on nearshore/waterfront/shoreline habitats as a result of the facilities that would be needed at ports to accommodate these vessels.

Consider the development of privately owned and operated passenger-only ferries that would provide transportation between the County islands and mainland and Canadian destinations and evaluate and mitigate for associated impacts.

Pg 16 line 23 FSJ does not support replacing “consider” with “support.” Retain current language and add clarifying language on evaluating and addressing impacts (see above).

4. Consider the need for alternative modes of marine transportation, such as private marine passenger-only service and barges, and encourage the development of direct connections to mainland intermodal transportation hubs.

Pg 16 line 20 FSJ supports sustainable timber operations and recommends adding language on appropriately siting log dumps.

Support the development of one appropriately located log dump on each island if needed to address the freight mobility 20 needs of the forestry industry, consistent with protection of sensitive marine habitats.

Pg 19 line 1 D. FSJ recommends the addition of shuttle access.

Promote the development of improved pedestrian, bike and shuttle access at terminals to encourage walk-ons.

Pg 19 line 31 FSJ recommends this addition to #9:

Upgrade and modernize our aging fleet of ferries to ensure reliable ferry service and reduce vessel traffic noise impacts and carbon (and other contaminant) pollution impacts with new, quieter, hybrid-electric ferries.

Pg 20 line 38 FSJ recommends this addition to b.:

Evaluate environmental impacts and identify appropriate mitigations for any additional Promote alternative modes of transportation, such as private ferry systems, barges, air transportation, and passenger-only services, which could reduce need for expanded vehicle terminal facilities in the islands-

6.4.C policies for marine facilities

Pg 23 line 30 # 2. FSJ supports the inclusion of a policy on public barge landing sites but recommends text regarding the appropriate siting and design of such facilities.

Support the development of one public barge landing site per island, that is appropriately sited, environmentally responsible, and consistent with the Shoreline Master Plan and where adequate parking space is available.

Pg 24 line 32 FSJ supports the addition of sea level rise consideration but recommends language edits to include both flood and erosion hazards as well as the opportunity to improve ecosystem function.

Consider the impacts of sea level rise, and accompanying flood and erosion hazards, and opportunities to improve resiliency, when evaluating new development and/or maintenance of marine facilities.

6.5 land transportation goals and policies

Pg 26 FSJ supports the addition of new policies (#5 and #7) related to reducing carbon emissions and implementing multi-model transportation options.

Pg 26 line 46 FSJ supports efforts to improve low impact public access at shoreline road ends but not the exploration of undefined 'other' uses. We recommend the following edits:

Consider the inventory of County road ends that abut shorelines, which is included in the 2010 San Juan County Parks, Trails and Natural Areas Plan and Nonmotorized Plan, and evaluate their potential for low impact recreational uses.

Pg 27 line 11 new # 9 FSJ supports the addition of #9 but recommends text to clarify that erosion and flood hazards are known risks associated with sea level rise, along with storm surge. We also recommend that the policy also address the negative impacts of infrastructure such as the loss of intertidal habitat via the coastal squeeze as well as the opportunity for improved resiliency through the consideration of realignment and adaptive designs.

Ensure that County road standards and practices are updated to reflect climate change projections, and that new roads are sited appropriately and protected from sea level rise, increased

flood and erosion hazards, and storm surge and that consideration will be given to identifying and implementing opportunities to improve community and environmental resilience.

Pg 30 line 7 b FSJ recommends the following edits to the private roads standards.

Require private roads to avoid and minimize environmental impacts, protect critical areas and maintain the scenic character of island roads.

Pg 30 6.5.e FSJ recommends the addition of a new policy in the parking section related to promotion of pervious surfaces and other means of reducing stormwater impacts from new parking areas.

Pg 32 line 22 FSJ recommends the language for bike travelways should be much stronger than consider.

Develop and implement the policies, design guidelines, recommendations, and standards for accommodating bicyclists on County trails adopted in the San Juan County Parks, Trails and Natural Areas Plan and the San Juan Islands Scenic Byway Corridor Management Plan.

Pg 33 line 14 FSJ recommends that the county consider adding a new goal related to electrified transportation and reduced fossil fuel usage in new transit alternatives.

Pg 34 line 39 # 2 FSJ recommends that this goal is broadened to reflect the tight interconnection between the economy and the environment in San Juan County. Or, as a lesser preferred alternative add a new goal to this section that is specifically related to environmental sustainability

To coordinate with multiple agencies and jurisdictions to facilitate the efficient transportation of people, goods, and services, in order to strengthen the local and regional environment and economy.

P 36 line 14 # 12 FSJ recommends the addition of environmental sustainability to this goal. Our economy and environment are linked and our community goals are not driven solely by economic desires.

Promote the development of transportation facilities that serve to improve the mobility of goods, services, and people to encourage economic development and environmental sustainability, and implement compatible transportation plans compatible with those of the County and neighboring RTPOs.

Pg 36 line 31 FSJ recommends adding an additional policy #18 as an additional opportunity to address the need to work with WSF and the legislature to address vessel impacts.

Work with the Governor, Legislature and WSF to construct new, quieter, hybrid-electric ferries that would reduce vessel traffic noise impacts and carbon (and other contaminant) pollution impacts and would upgrade and modernize our aging fleet of ferries and ensure reliable ferry service.