

October 24, 2025

San Juan County Department of Community Development,
Planning Commissioners and County Council
135 Rhone St.
Friday Harbor, WA 98250
Submitted via email: compplaincomments@sanjuansco.com

Submitted to:

San Juan County Council, Planning Commission, and Department of Community Development

RE: Comments on the Draft Climate Element – San Juan County Comprehensive Plan Update

Dear Members of the San Juan County Council, Planning Commissioners, and Staff,

Thank you for the opportunity to comment on the Climate Element of San Juan County's Draft Comprehensive Plan update. The County's recognition of climate change as a cross-cutting issue affecting every aspect of community life is deeply appreciated. To strengthen the Climate Element's effectiveness and ensure consistency across Comp Plan policies, Friends respectfully recommends the following revisions and additions:

1. Revisions to the Vulnerability Assessment

The **Climate Vulnerability Assessment** should be edited to more fully reflect local risks and mitigation opportunities:

- Under **Buildings and Energy**, the County should include **increased tree retention** as a key mitigation measure. Retaining trees during development helps reduce flood impacts on structures and lowers energy use for cooling.
- Add a **next step** under **Buildings and Energy** to, at the very least, **encourage** the siting of new buildings—and the relocation of existing structures—outside of flood risk zones to the maximum extent practicable.
- Include a **commitment to study and address seawater intrusion**, which is projected to worsen as drought and sea level rise affect the freshwater/saltwater balance, decreasing freshwater storage capacity in local aquifers.

2. Addition of a New Overarching Policy (Policy 1.5)

Add the following language as a new overarching **Policy 1.5** to embed climate awareness across all Elements of the Comprehensive Plan:

“All goals and policies stated in each Element of the Comprehensive Plan, and all codes and regulations adopted to implement these goals and policies, shall be interpreted and implemented in a manner to give greatest effect to avoid increasing climate change, and to best protect existing and future development and infrastructure from the impacts of climate change.”

This statement is currently located on page 22 in Section A, Introduction and Vision of the October 3, 2025 draft comp plan. As an overarching policy, however, it would establish a clear directive that climate considerations must guide all planning and implementation actions.

4. Revision to Policy 3.3

Revise Policy 3.3

From: “Prioritize and fund a Countywide Forest Health Plan to identify actions that will improve forest and watershed health and carbon sequestration where ecologically appropriate. Preserve and enhance healthy mature forests and forested riparian/wetland/shoreline buffers as carbon sinks to absorb greenhouse gases and bolster local climate resilience to hazards such as extreme heat, wildfire risk, landslide and erosion hazards.”

To: “Prioritize and fund a Countywide Forest Health Plan to identify actions that will improve forest and watershed health and carbon sequestration where ecologically appropriate. Strictly limit the removal of and enhance healthy mature forests and forested riparian/wetland/shoreline buffers and enhance and promote forests in cleared areas as carbon sinks to absorb greenhouse gases and bolster local climate resilience to hazards such as extreme heat, wildfire risk, landslide and erosion hazards.”

This revision acknowledges that protecting existing natural systems is a more effective and less resource-intensive approach than attempting to replace or compensate for lost ecological functions.

5. New Policy Under Goal 4 (Built Environment Resiliency)

Under **Goal 4 – Strengthen the resiliency of San Juan County’s built environment (roads, buildings, pipes, water and sewer infrastructure, etc.)**, add the following policy:

“Policy 4.7. Ensure that new infrastructure is constructed in locations where it is not vulnerable to climate change risks and relocate vulnerable existing infrastructure to safer locations when opportunities arise, such as during repairs and major maintenance projects.”

This revision would give voice to the discussion found in other Comprehensive Plan Update materials that some infrastructure relocation will be necessary, will be aligned with the new

Shoreline Management Act proposed rulemaking, and it will also offer a more cost-effective approach than frequent repairs for damages caused by construction in vulnerable areas.

6. New Policy on Water Supply Resilience

Under **Goal 4**, the County should be more direct about the importance of freshwater in a changing climate by adding:

Policy 4.8. Monitor, assess, and reduce water use where practicable to ensure that existing residents have access to sufficient, potable water.

Given growing risks of drought and saltwater intrusion, this proactive step would support long-term freshwater security for island residents. Additionally, it is a good reminder to the community that freshwater resources are not infinite and will run out. Our behavior as a community and the efforts of the County to have residents act accordingly, should start with comp plan policies.

Conclusion

These recommended edits would make the Climate Element more actionable, internally consistent, and better aligned with San Juan County's goals of community resilience and sustainability. By integrating tree retention, appropriate infrastructure siting, and aquifer protection into clear climate policies across the Comprehensive Plan, the County can take a leadership role in climate-conscious land use planning—enhancing island resilience while also aligning with requirements anticipated under the new Shoreline Management Act rulemaking. Friends urges the County to actively engage in that rulemaking process to advance its own interests and gain valuable insight into effective climate resiliency strategies.

Thank you for your thoughtful work on this important update and for considering these comments.

Respectfully submitted,



Magali Cota

Staff Attorney and Legal Director for Friends of the San Juans