

Friends of the San Juans

Protect this Place

May 12, 2025

Sophia Cassam, Planner III
San Juan County Department of Community Development
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Dear Ms. Cassam:

Thank you for the opportunity to submit these comments on the May 1, 2025, draft of the San Juan County Comprehensive Plan (Comp Plan) update on behalf of Friends of the San Juans (Friends). After reviewing the aggregated goals and policies for all Comp Plan elements, we appreciate the adjustments that the County has made to the individual element drafts to address our concerns and recommendations. The 2025 update continues to promote the positive values that our community shares around protecting our rich natural surroundings and rural character while ensuring that residents enjoy meaningful employment opportunities, affordable housing, and a variety of safe and healthy transportation choices. While the reality on the ground does not match these community values in many instances, the Comp Plan Vision, Goals, and Policies could help us bridge that gap if faithfully implemented.

Against this backdrop, we reiterate the recommendations below that were not incorporated into the current draft of the Comp Plan update. These recommendations would assist the Comp Plan in meeting its overall vision for healthy ecosystems, responsibly managed resources, and the preservation of our rural character.

- **Eastsound Urban Growth Area (UGA).** Friends continues to appreciate that the Comp Plan update would promote new housing in the Eastsound UGA to address the existing and projected deficit of low and medium-income housing there. This approach is consistent with the policy to establish land use patterns that reduce demand for transportation and infrastructure (Policy LU 14.6). However, it is important to understand development patterns in Eastsound and address how disincentives such as parking requirements, utility hookup fees, and site-by-site sidewalk construction, are affecting actual construction of denser housing.

We recommend that the County prioritize steps to address this in the following order:

- (1) decrease barriers to higher density development in Eastsound, for example parking requirements, utility hookup fees, and site-by-site sidewalk construction and consider use of incentives such as expedited permit processing for small home sizes as well as pre-approved engineering plans;
- (2) increase density within Eastsound; and
- (3) if additional land is needed, *after meaningfully pursuing options 1 and 2 above*, expand the UGA.

- **Blanket land use permit exemption for agricultural buildings. Policy LU 13.4.** We recommend against the proposal to establish a blanket exemption from land use permitting for non-residential agricultural buildings. This would prevent reviews that could help inform landowners of the impacts of clearing and grading and building those structures and their appurtenant access drives on stormwater, critical areas, and soils.
- **Omission of farmworker housing from density calculations. Policies LU 13.11, H 5.5.** As we've discussed, we support measures to increase food security like sustainable production of local foods. However, we recommend against a blanket exclusion of farmworker housing from density calculations. Instead, we recommend that the County establish an alternative density for farmworker housing more consistent with rural farm forest densities. This could help ensure that farmworker housing does not overload the capacity of local resources like water availability and septic capacity (particularly during the summer season, when precipitation wanes and groundwater levels drop) and also avoid relegating farm employees to lower housing standards than deserved.
- **Include Best Available Science (BAS) in designating and protecting critical areas. Policy LU 34.5.** The Comp Plan doesn't currently propose to base its critical areas protections on BAS. We propose that it do so by deleting the text as follows in Policy LU 34.5: "In conformance with the GMA in designating and protecting critical areas establish regulations that protect critical areas, based on ~~consideration of~~ the best available science."
- **Regulations for compatible agricultural uses in wetlands and their buffers. Policy LU 38.6.** While we support any efforts by the County to limit the impacts of agriculture on wetlands and their buffers, which largely has been lacking since it entered into the Voluntary Stewardship Program, we are not aware of Best Available Science that shows that agricultural uses can be rendered compatible with wetlands and their buffers. We recommend that this policy is removed unless Best Available Science is provided that supports the possibility of farming in wetlands and their buffers can be done in a way that doesn't impact them.
- **Non-agricultural, high-density dwelling units on agricultural lands. Policy H 7.8.** We recommend deleting the proposed policy H 7.8, which would authorize the construction of six dwelling units on agricultural resource land of any size without adequate protection for agricultural soils or even dedication of all housing to agricultural uses and subject to an unspecified long-term affordability requirement.

- **Active transportation. Element 6.** We reiterate our recommendation that the Comp Plan incorporate meaningful language intended to increase safety for non-automobile users of our transportation network, a need highlighted by recent collisions between vehicles and pedestrians. This would also create better separation between incompatible users of our roadways, such as large construction and landscaping trucks and groups of active users like cyclists and pedestrians on our roads. These policies would read as follows:
 - **New Policy.** Design and construct paths for active transportation that are separated from roads wherever possible, achieved by eliminating shoulders for the road surface if necessary to achieve this within the road right-of-way.
 - **New Policy.** Annually monitor the length of new complete streets corridors that have been built in the prior 12 months.
- **Level of Service for "active transportation." Transportation Policy 9.h.** The Comp Plan has adjusted the active transportation level of service ("LOS") metric from its earlier version so that it would now establish as the mid-level LOS "Shoulder present OR low volume, low speed shared use roadway with higher levels of traffic stress." This metric should be revised for specificity and accuracy for actual active users of our transportation infrastructure. The following would achieve this:
 - "Minimum 5-foot-wide S-shoulder present in each direction of travel OR low volume, low speed shared use roadway with speeds up to 35 mph and shoulders a minimum of 4 feet higher levels of traffic stress."
- **Protecting habitats and environments. Policy U 5.2.** To ensure that impacts to habitats and environments are addressed, we recommend that Policy U 5.2 be revised as follows: "Condition the approval of new utility facilities to observe the mitigation sequence for addressing ~~avoid or mitigate any significant~~ adverse impacts.
- **Addressing impacts of new utility facilities. Policy U 4.5 and Policy U 73.** For consistency with the mitigation sequence, we recommend adding "avoid" and "compensate" for addressing impacts of new utility facilities, as follows:
 - Policy U 4.5. New utility generation facilities, transmission facilities, substations and submarine transmission cable terminal facilities should be located and sited to avoid, minimize, and compensate for adverse impacts to the County's shorelines and rural character.
 - Policy U 7.3. Locate and site new upland power transmission facilities, substations, and submarine transmission cable terminal facilities to avoid, minimize, and compensate for adverse impacts to the rural character, shorelines, and natural environment of the County.

B. Misstatements That Warrant Correction.

The following statements in the Comp Plan should be corrected to reflect the reality on the ground:

- **that Beaverton Valley Road has 4-foot shoulders.** (page 29 of Appendix 6). A simple visual inspection of Beaverton Valley Road reveals that, while there are a few portions with small shoulder, very little reaches 4 feet in width and most of the road has far narrower shoulders.
- **that 60-foot-wide Rights-of-Way are not usually wide enough to accommodate more than two lanes with drainage elements.** (pages 29-30 of Appendix 6). The Appendix asserts that the County's 60-foot rights-of-way aren't wide enough to accommodate more than 2 lanes and drainage elements, but this statement conflicts with transportation corridors along Mount Baker Road and Fisherman Bay Road that accommodate two traffic lanes, shoulders, ditches, vegetation, and 4-6 feet of separated path within 50 feet and 55 feet, respectively. The elimination of the 4-foot shoulders on either side of the roads would increase the amount of space available for separated paths.
- **that accessory dwelling unit (ADU) construction in rural lands outside of urban areas is limited to 8 per year.** (Page 37 of the Land Capacity Analysis – Draft). As a result of a 2003 settlement agreement, the County authorizes ADU permits equal in number to 12% of the total building permits for the previous year.

Sincerely,



Eva Schulte
Executive Director
Friends of the San Juans