

Friends *of the* San Juans

March 20, 2025

To: Sophia Cassam, Planner III; Planning Commissioners; County Council

Delivered via email to: sophiac@sanjuanco.com

From: Friends of the San Juans

Re: Comments for Planning Commission review of the San Juan County Comprehensive Plan Update on the Climate Element and Eastsound Urban Growth Area Proposal.

Dear Planning Commission and County Council,

Friends of the San Juans (“Friends”) appreciates the efforts that the County has made to update its Comprehensive Plan to address climate mitigation and adaptation and our community’s severe housing needs. The proposed Climate Element, in particular, would substantially upgrade the existing Comprehensive Plan and establish valuable goals and policies that would benefit our treasured natural heritage in addition to our ability to combat and weather the worst effects of climate change. We respectfully offer the comments below to identify several areas where the Climate Element could be strengthened further.

Climate Element

- Vulnerability Assessment. A few points caught our eye in the Vulnerability Assessment. While we understand that the assessment has been completed, we encourage the County to consider the following three items as it looks toward Next Steps for addressing resilience (page 45):
 - 1) include increased tree retention under Buildings and Energy. Retaining trees during development will assist in mitigating the impacts of flood events on buildings and in decreasing energy usage for cooling.
 - 2) add as a next step under Buildings and Energy a recommendation to develop new buildings, and relocate existing buildings, outside of flood risk zones to the maximum extent possible; and

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- 3) study and take steps to address seawater intrusion, which is likely to increase as droughts and sea level rise combine to raise the freshwater/saltwater lens and thereby decrease freshwater storage capacity in local aquifers.
- Goals and Policies. The following recommendations could improve the excellent draft language (underlines reflect additions):
 - revise Policy 1.1 to state, “Review and, if necessary, update goals, policies, and development regulations during San Juan County Comprehensive Plan periodic updates to ensure that:” *This revision renders the text consistent with the subparagraphs that discuss reviewing goals and policies.*
 - add a new overarching policy 1.5 that recognizes the importance of climate change for the County’s land use planning, as follows: “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.”
 - revise Policy 3.3. to state, “Strictly limit the removal of and [e]nhance healthy mature forests and forested riparian/wetland/shoreline buffers as carbon sinks to absorb greenhouse gases....” *This revision would recognize that the protection of existing resources provides a simpler and more effective approach than attempting to compensate for impacted resources.*
 - Under Goal 4 (Strengthen the resiliency of San Juan County's built environment (roads, buildings, pipes, water and sewer infrastructure....), add the following policy, “Policy 4.7. Ensure that new infrastructure is constructed in locations where it is not vulnerable to climate change risk and relocate vulnerable existing infrastructure to locations outside of vulnerable areas when opportunities arise, such as during repairs and larger maintenance projects.” *This revision would give voice to the discussion found in other Comprehensive Plan Update materials that some infrastructure relocation will be necessary, and it will also offer a more cost-effective approach than frequent repairs for damages caused by construction in vulnerable areas.*

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- Under Goal 4, unless this item will be addressed in the Water Element, add the following, “Policy 4.8. Monitor, assess, and reduce water use where practicable to ensure that existing residents have access to sufficient, potable water.”

Eastsound UGA

- Upzone. Consider increasing density in additional areas within the existing Eastsound Urban Growth Area (“UGA”) to provide maximum flexibility for development and to promote multifamily construction. Available areas that do not appear to have been considered include the southwestern portion of the Eastsound UGA.
- Expansion. When considering expansion, begin with properties that are closer to the downtown core rather than those further away. For example, the County has targeted approximately 30 acres for expansion of the UGA at its northeast corner while overlooking four parcels totaling approximately 100 acres between that property and the rest of the UGA to the southwest. As part of an orderly expansion of the UGA and the services and utilities that come with such an expansion, it would be prudent to expand into the closer parcels first.
- Development assumptions. We note that the Eastsound UGA report reduces the assumption for seasonal/recreational/occasional (“SRO”) use properties from 33% of future development to 20% of future development within the UGA, based on the County’s cap on vacation rentals. But the report does not explain how it reached the new estimate or how it compares to existing SRO use of properties in the Eastsound UGA. We encourage the County to provide that information going forward. We also strongly encourage the County to dedicate staff time toward generating ideas and implementing practices to reduce those numbers so that local housing can provide housing for local residents.

Thank you for your consideration of these comments.

Sincerely,



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