



Documents prepared by the Island County Marine Resources Committee  
Dates from Fall 2023 through Fall 2024

Enclosed in this folder is one inclusive document of all comments prepared by the Island County Marine Resources Committee (MRC) speaking to each Element of the Comprehensive Plan. The Natural Resources comments were requested by the Department. All others were submitted at the initiative of the MRC as public comments to the county Planning Commission.

Each document is included as it was submitted to the county's Planning Commission. The documents are in a variety of formats which reflect of our committee's learning over time how best to present our suggestions.

All documents were drafted by a committee of the MRC, reviewed and edited by all MRC members and voted for submission by the entire MRC. These comments represent the best efforts of the MRC to provide prudent, well informed and current suggestions for policy making regarding marine resources directly and other elements of planning which are enter twined with marine resource issues.

#### ATTACHED DOCUMENT CONTENTS

1. Natural Resources
2. Historic Preservation
3. Economic Development
4. Capital Facilities
5. Parks
6. Transportation
7. Utilities
8. Proposal to create a Marine Character Element to the Comprehensive Plan
9. Climate – Sea Level Rise
10. Climate – Groundwater
11. Climate - Heat

<u>Department</u>	<u>Feedback</u>
<b>Island Co Marine Resources Committee (MRC)</b>	<p><b>Introduction to MRC recommendations:</b></p> <p>The following comments and recommendations are presented on behalf of the Island County Marine Resources Committee (MRC), a diverse group of volunteers with a wide range of skills, formal training and professional experiences all pertinent to the MRC’s purpose to protect and restore Island County’s marine life, 200+ miles of shoreline habitat and ecosystems.</p> <p>This purpose requires attention to the county’s integrated ecological networks that include shore and tideland water quality, flood prone areas, inland wetlands and streams, forests and lands modified for a variety of uses. This purpose also requires consideration of emerging climate and sea level changes which impact these systems and will require policy adjustments.</p> <p>Our recommendations speak to this wide range of domains within the Natural Resources element of the Comprehensive Plan. For information that supports our recommendations, please see the white paper: <i>Emerging Hazards, Challenges and Opportunities Facing Island County related to Climate Change</i>, submitted by the MRC to the Board of County Commissioners on 12/20/23 (link below): <a href="https://www.islandcountymrc.org/media/21254/20231106-mrc-climate-change-white-paper.pdf">https://www.islandcountymrc.org/media/21254/20231106-mrc-climate-change-white-paper.pdf</a></p> <p>Thank you for the opportunity to submit comments.</p>
<b>MRC</b>	<p><b>NR 1.3 (General Environmental Quality - Conserve Energy)</b></p> <p><b>Add:</b> encourage and model use of alternate energy sources, discourage the use of fossil fuels, and intensify community efforts to reduce waste, reuse and recycle all forms of unwanted items and materials and eliminate food waste.</p>
<b>MRC</b>	<p><b>NR 1.4 (Protecting the Night Sky)</b></p> <p><b>Rewrite:</b> The night sky is an asset of importance to animal and human populations. It should be preserved through discouraging exterior lighting and, when used, requiring that all exterior lighting be shielded from adjacent properties and directed downward. This applies to all exterior lighting and particularly to high intensity night lighting (code should define high intensity). DarkSky certification is a resource of interest: <a href="https://darksky.org/what-we-do/international-dark-sky-places/">https://darksky.org/what-we-do/international-dark-sky-places/</a> and national and international identification of night sky sites as tourist destinations are also of interest: <a href="https://www.nationalgeographic.com/travel/article/dark-sky-tourism-is-on-the-rise-in-the-us">https://www.nationalgeographic.com/travel/article/dark-sky-tourism-is-on-the-rise-in-the-us</a></p>
<b>MRC</b>	<p><b>NR Goal 2 (Air Quality)</b></p> <p><b>Add:</b> Air quality is an essential factor of importance to all forms of life. Air pollution from county sources is dominated by vehicles, off-road vehicles (including marine) and fires. Strategies to improve and preserve air quality include limiting use of fossil fuels and incentivizing conversion to alternate fuels for school buses (to improve air quality for children) and for wood stoves to heat pumps (to improve air quality especially for sensitive populations).</p>

MRC	<p><b>NR Goal 3 (Wetlands)</b>  <b>Consideration:</b> Throughout this goal we suggest leaning into protection (and enforcement of protection) of the resource vs justifying encroachment. This would complement priorities for safety, climate resilience and water recharge and ecological habitat protection. We also suggest an extension of the goal: ...<i>“wetlands are valuable because they clean the water, recharge water supplies, regulate temperature, reduce flood risks, and provide fish and wildlife habitat. In addition, wetlands provide recreational opportunities, aesthetic benefits, sites for research and education, and support indigenous and commercial fisheries.”</i></p>
MRC	<p><b>NR 3.1.1</b>  <b>Consideration:</b> The loss of wetland footprints and functions is a significant loss for water recharge, stormwater management and wildlife habitat all of which compel leaning toward conservation and away from encroachment; toward respect for buffers and toward minimizing the need for mitigation.</p> <p><b>What constitutes “when there is no reasonable alternative”? Code should provide a definition, and possibly examples of solutions.</b></p> <p>For example: <i>a wetland mitigation bank is an example of a type of solution and means a site where wetlands are restored, created, enhanced, or in exceptional circumstances, preserved, expressly for the purpose of providing compensatory mitigation in advance of unavoidable impacts to wetlands or other aquatic resources. Wetland Mitigation Banks are certified by the State under WAC 173-700 and are eligible for a designated service area. Credits from mitigation may be used to compensate for wetland impacts within the approved service area. Use of an approved wetland mitigation bank is usually permitted when the applicant has clearly demonstrated that on-site mitigation is not feasible. The use of the approved wetland mitigation bank may be necessary to achieve reasonable use of the subject property.</i></p> <p>We suggest potential policies to be added to code after NR 3.1.5:</p> <p><b>Add: NR 3.1.6.</b> <i>The County should allow for use of credits from certified mitigation banks when on-site mitigation is not feasible.</i></p> <p><b>Add: NR 3.1.7.</b> <i>The County should identify potential mitigation banks for certification to provide opportunities within designated areas. Best available science (BAS) should be used to identify mitigation best practices and evaluate mitigation outcomes.</i></p>
MRC	<p><b>NR 3.1.2</b>  <b>New wording:</b> <i>“When development will impact wetlands, projects that add to existing wetlands and/ or increase functions and values of degraded wetlands are preferred over efforts to mitigate and/ or create wetlands from non-wetland areas and should remain subject to wetlands protection regulations”</i></p>
MRC	<p><b>NR 3.3</b>  <b>Add:</b> <i>...“Ensure septic systems are not, under any circumstances, located in wetlands or their buffers, or in areas that are subject to flooding for any reason particularly during high runoff rain storms or coastal flooding events.”</i></p>

MRC	<p><b>NR 3.1.6 (additional section as suggested in 3.1.1 re: wetland mitigation banks)</b>  <i>The County should allow for use of credits from certified mitigation banks when on-site mitigation is not feasible.</i></p>
	<p><b>NR 3.1.7 (additional section as suggested in 3.1.1 re: wetland mitigation banks)</b>  <i>The County should identify potential mitigation banks for certification to provide opportunities within designated areas.</i></p>
MRC	<p><b>NR 3.7</b>  <b>New wording:</b> <i>"When development will impact wetlands, projects that add to existing wetlands, increase functions and values of degraded wetlands are preferred over efforts to mitigate and/ or create wetlands from non-wetland areas and should remain subject to wetlands protection regulations"</i></p>
MRC	<p><b>NR Goal 4 (Fish and wildlife habitat conservation )</b>  Throughout this goal we suggest leaning into protection (and enforcement of protection) of the resource vs justifying encroachment. This would complement priorities for safety, climate resilience and water recharge.</p>
MRC	<p><b>NR 4.4</b>  <b>Need to clarify what it means to "protect all streams".</b> Is there a 100 foot buffer around all streams to prevent sediment from impacting the stream? Is there a 50 foot buffer? Is there a requirement to leave vegetation in place around the stream? What monitoring is required to "protect all streams". Protect them from what? Temperature changes? Effects of drought? Sediment buildup? Scouring the sediment and washing it downstream?</p> <p><b>Suggested Language:</b> <i>Buffers should reflect Best Available Science (BAS) including Washington Dept. of Fish and Wildlife (WA DFW) guidance on Fish and Wildlife Conservation Areas. The scientific literature review informs WA DFW's position that protecting the area within one SPTH200 from the edge of a stream channel maintaining full riparian ecosystem functions for all aquatic species, including salmon, and promotes healthy, intact riparian ecosystems. Site Potential Tree Height at 200 years "SPTH200" refers to "the average maximum height of the tallest dominant trees (200 years or more) for a given site class. The phrase "200 years or more" is in reference to the approximate minimum age of old-growth forests, which reflects an underlying assumption that old-growth forest conditions are needed for full riparian ecosystem functions.</i></p>
MRC	<p><b>NR 4.5.1</b>  <b>Add:</b> <i>... Because of the fragility of the island ecosystems, ban all new Concentrated Animal Feeding Operations (CAFO) and ensure that the currently functioning CAFOs are adequately inspected, monitored, and enforcement takes place if there is any risk to the waterways of the County.</i></p> <p>There are Best Management Practices published by WSU:  <a href="https://extension.wsu.edu/animalag/content/what-is-required-in-a-nutrient-management-plan/">https://extension.wsu.edu/animalag/content/what-is-required-in-a-nutrient-management-plan/</a></p>

MRC	<p><b>NR Goal 4.7</b></p> <p><b>To guide decision-makers in considering the tradeoffs between existing land use and applications for changing the use that may impact near shore areas, enumerate the ecosystem services that may be impacted.</b> For instance, <i>beaches provide biodiversity, habitats for spawning of important marine species, recreation, coastal protection, nutrient regulation, etc. Coastal ecosystems such as salt marshes act as natural barriers that protect coastlines against storm damage, dissipating wave energy and reducing the risk of coastal flooding and erosion. When shoreline areas are changed, there are impacts to the marine environment, which may inhibit spawning of forage fish which impact the many species that feed on them. Consider the linkages between all aspects of the food web when considering the impacts of land use changes.</i></p>
MRC	<p><b>NR Goal 5 (Frequently flooded areas)</b></p> <p><i>Historically flood-prone areas and traditional treatments of these locations are subject to major changes as climate change and sea level rise become evident in fluctuations of inundation and drought in fresh water conditions, as extremes in sea level dynamically press to higher levels and as storms intensify. These pressures will create a basis for policies designed for safety, resilience, sustainability and protection. At the same time, these pressures may open opportunities to conserve habitat of importance for fish, wildlife, public recreation and access; and for mitigation. Expand consideration of frequently flooded areas beyond stream flooding. Frequently flooded areas are areas that are subject to periodic inundation due to high ground water or areas subject to tidal flooding that are subject to at least one percent or great chance of flooding in any given year.</i></p>
MRC	<p><b>NR 5.1.2</b></p> <p><b>Suggestion:</b> <i>Require constructed wetlands or other mitigation if more than 25% of the property is impervious through development. 75% of properties must be pervious.</i></p>
MRC	<p><b>NR 5.1.3</b></p> <p><b>Suggestion:</b> <i>What is the threshold to trigger minimizing run off? (Our preference is that this ideally should be a routine practice.) Suggest 25% in the NR 5.1.2 per comment above and that all thresholds should be based on Best Available Science.</i></p>
MRC	<p><b>NR 5.5</b></p> <p><b>Addition:</b> <i>to implement LID practices to minimize storm water flooding, direct stormwater for safety and resilience, and add to freshwater recharge.</i></p>
MRC	<p><b>NR 5.5.1</b></p> <p><b>Recommended additional clarification:</b></p> <p><i>Ensure septic systems are not, under any circumstances, located in areas that are subject to flooding for any reason, particularly during high runoff rain storms or coastal flooding events.</i></p>
MRC	<p><b>NR 5.6</b></p> <p><b>Suggest use of NOAA planning document:</b> <a href="https://coast.noaa.gov/digitalcoast/tools/slr.html">https://coast.noaa.gov/digitalcoast/tools/slr.html</a> and consultation with UW Climate Impacts Group (CIG) and the CIG resource library</p>

MRC	<p><b>NR Goal 6 Geologically Hazardous Areas</b></p> <p><b>Consideration:</b> Throughout this goal we suggest leaning into protection (and enforcement) of the resource vs justifying encroachment and advising of risks on such sites before permitting. This would complement priorities for safety, climate resilience and water recharge and support wildlife habitat goals.</p>
MRC	<p><b>NR 6.1</b></p> <p><b>Addition:</b> ....caused by geological processes and/ or human disturbances including site modification, modification of vegetation and/ or modifications for storm water management</p>
MRC	<p><b>NR 6.1.1</b></p> <p><b>Addition:</b> <i>description of risks</i></p>
MRC	<p><b>NR 6.2</b></p> <p><b>Addition:</b> <i>Discourage development, advise of risks and ...</i></p>
MRC	<p><b>NR 6.3</b></p> <p><b>Addition:</b> .... <i>Existing and emerging hazardous geological conditions</i></p>
MRC	<p><b>NR 6.4</b></p> <p><b>Addition:</b> ....<i>and short and long-term potential impact to public safety.</i></p>
MRC	<p><b>NR 6.5</b></p> <p><b>Consideration:</b> This is a valuable location for an enforcement clause?</p>
MRC	<p><b>NR 7.1</b></p> <p><b>Suggested Edit:</b> <i>Protect the quantity and quality of the groundwater through an integrated systems-approach to management of watersheds, areas of recharge, utilization of wells and septic systems and employment of BAS for the benefit of existing and future residents of Island County.</i></p>
MRC	<p><b>NR 7.1.1</b></p> <p><b>Recommendation:</b> Provide incentive programs to encourage <i>residential and commercial water users</i> to participate in water conservation and aquifer recharge area protection programs.</p>
MRC	<p><b>NR 7.3</b></p> <p><b>Recommendation:</b> this be incorporated as part of the County Building Code and strengthened with goals and outcomes</p>
MRC	<p><b>NR 7.4</b></p> <p><b>Recommendation:</b> this be incorporated as part of the County Building Code and strengthened with goals and outcomes</p>

MRC	<p><b>Goal 8 Protect aquifer recharge areas</b></p> <p><b>Recommendation:</b> adding examples of strategies to accomplish this</p>
MRC	<p><b>NR 8.1</b></p> <p><b>Suggestion:</b> with water information required for permitting, include recharge related to the planned source.</p>
MRC	<p><b>NR 8.2.1</b></p> <p><b>Addition:</b> ...<i>contamination from surface activities and risks for salt water intrusion</i></p>
MRC	<p><b>NR 9.1</b></p> <p><b>Consideration:</b> County Departments and property owners use the available tools to plan for increased rainfall in winter and droughts in summer.</p>
MRC	<p><b>NR 9.2</b></p> <p><b>Suggestion:</b> reference to LID and storm water management</p> <p><b>Addition:</b> <i>County Departments and property owners use the available tools to plan for increased rainfall in winter and droughts in summer.</i></p>
MRC	<p><b>NR 9.3</b></p> <p><b>Suggestion:</b> reference to LID and storm water management</p> <p><b>Addition:</b> <i>County Departments and property owners use the available tools to plan for increased rainfall in winter and droughts in summer.</i></p>
MRC	<p><b>NR 9.4</b></p> <p><b>Consideration:</b> is this strong enough to be implemented and protective enough?</p> <p><b>Addition:</b> ... <i>Consider groundwater and watersheds when locating areas of planned development.</i></p>
MRC	<p><b>NR 9.5</b></p> <p><b>Recommendation:</b> <b>Strengthen this language in light of changing climate conditions and incorporate best practices into the Building Code.</b> This is an opportunity for examples and incentives to move from a vague encouragement to a tangible practices.</p>
MRC	<p><b>NR 10.1</b></p> <p><b>Addition:</b> ....<i>Carefully consider siting solar and wind on public or private lands. Be careful to ensure that the public has access to the shoreline, and open space.</i></p>

MRC	<p><b>NR 10.1.1 and 10.1.2</b></p> <p><b>Recommendation:</b> Using the broad definition of ecosystem services and considering the value of those services can help with considerations of “real costs”. A good reference for this can be found at:  <a href="https://coast.noaa.gov/data/digitalcoast/pdf/measuring-value-ecosystem-services.pdf">https://coast.noaa.gov/data/digitalcoast/pdf/measuring-value-ecosystem-services.pdf</a></p> <p>The judgment that a particular parcel has “little value as public conservation or recreational land” needs to be based on sound science. The NOAA methodology is a tested way to make such judgements.</p>
MRC	<p><b>NR 10.2</b></p> <p><b>Addition:</b> <i>...Identify shorelines and tidelands as “open space”</i></p>
MRC	<p><b>NR Goal 11</b></p> <p><b>Consideration:</b> The language used in this goal is broad and expressed in terms that a layman can understand. There is no jargon. However, the concept of “valuable resources” is not defined. How is the value of a resource determined? This goal presents an opportunity to promote more systemic thinking - how resources depend on each other - which should be emphasized since each of these goals does not exist in a vacuum, but is very much related to all of the other goals.</p>
MRC	<p><b>NR 11.3</b></p> <p><b>Strengthen this language</b> - this is an opportunity for examples and incentives to move from a vague encouragement to a tangible recommendation</p> <p>Consider language that includes visitors to Island county and not just County residents. Tourism is an economic driver.</p>
MRC	<p><b>NR 11.4 New additional section</b></p> <p>Suggest adding an additional sub goal that speaks to the value of land for renewable energy production or carbon sequestration. Balancing this new and important land use category will be important for the future of Island County .</p>
MRC	<p><b>NR 11.5 New additional section</b></p> <p><b>Add:</b> <i>...Recognize, care for and publicize historic public access sites to shore and tidelands and encourage tideland owners to tolerate/ support public access and consider allowing public access on tidelands at low tide.</i></p>
MRC	<p><b>NR 12.3</b></p> <p><b>Addition:</b> <i>...also including shoreline and tideland open spaces to be accomplished by maintaining and publicizing locations of historic points of public access to shorelands and tidelands, adding new sites for public to access shore and tidelands, and encouraging tideland owners to allow public access to their privately owned tidelands.</i></p>



MRC	<p><b>NR 12.4</b>  <b>Addition of section:</b> <i>When considering “community driven relocation” as a response to sea level rise, consider the benefits of the addition of wetlands, estuary, shoreline, public access, open space in the equation. For context and definitions for “community driven relocation” see the National Academies Report: <a href="https://nap.nationalacademies.org/catalog/27213/community-driven-relocation-recommendations-for-the-us-gulf-coast-region?utm_source=All+DBASSE+Newsletters&amp;utm_campaign=dae0350015-BECS+community+driven+relocation+release&amp;utm_medium=email&amp;utm_term=0_e16023964e-dae0350015-275387388">https://nap.nationalacademies.org/catalog/27213/community-driven-relocation-recommendations-for-the-us-gulf-coast-region?utm_source=All+DBASSE+Newsletters&amp;utm_campaign=dae0350015-BECS+community+driven+relocation+release&amp;utm_medium=email&amp;utm_term=0_e16023964e-dae0350015-275387388</a></i></p> <p>These recommendations were developed for communities along the Gulf of Mexico already impacted by sea level rise, but the recommendations are useful for thinking through the implications for Island County.</p>
MRC	<p><b>NR goal 13</b>  <b>Consideration:</b> The goal focuses on explicit financial commitments (e.g. income and estate tax benefits, technical assistance grants and programs to purchase partial land interests.) It would be advantageous to explore other types of incentives that might be offered. Working with partners in the private or non-profit sector, or even in other areas of government, there may be additional opportunities that could be enumerated here. Otherwise, perhaps <u>broadening the language</u> so as not to preclude new and innovative solutions would be wise.</p>
MRC	<p><b>NR 13 New additional section</b>  Per NR 12.3 above ....<i>explore and implement incentives to encourage public access to shore and tide lands.</i></p>
MRC	<p><b>NR 14 New additional section</b>  Per NR 12.3 above ... <i>explore and implement incentives to encourage public access to shore and tide lands.</i></p>
MRC	<p><b>NR 15.8</b>  <b>Addition:</b> ... <i>to also avoid contamination of shorelands, tidal marshes and frequently flooded areas</i></p>
MRC	<p><b>NR 15.18.1</b>  <b>Addition:</b> ... <i>to avoid contamination of shorelands, tidal marshes and frequently flooded areas.</i></p>

**GENERAL ENVIRONMENTAL QUALITY**

**Goal 1. Safeguard the natural environment as an integrated system where the land, water, and air resources interact creating a balanced environment for all life on the islands.**

**NR 1.1.** Include the best available science in developing policies and development regulations to protect the functions and values of critical areas and give special consideration to conservation or protection measures necessary to preserve or enhance anadromous fisheries.

**NR 1.2.** Preserve Island County's environmental quality through the careful use of land, water and air resources.

**NR 1.2.1.** Extraction of mineral resources must minimize detrimental effects to the environment. (Other policies related to the siting and conservation of mineral lands are located in the Land Use Element.)

**NR 1.2.2.** Infilling of developed lands, Urban Growth Areas and areas of more intensive rural development will be encouraged in order to provide public facilities and services in the most efficient manner, as laid out in the Land Use Element.

**NR 1.2.3.** Island County encourages low-impact development practices.

**NR 1.3.** Conserve energy by encouraging efficient consumption and proper land use management.

**NR 1.3.1.** Government must provide leadership and education in employing energy conservation practices and the use of renewable energy technologies.

**NR 1.3.1.1.** Recycling of wastes and use of recycled or reused materials will be encouraged.

**NR 1.3.1.2.** Use of gray and treated black water will be encouraged, provided treatment design meets public health standards.

**NR 1.3.2.** Transportation systems and land use patterns must be designed to consider conservation of energy. Primary employers, commercial users and population centers will be clustered where possible to minimize worker, service and consumer travel, as laid out in the Transportation Element.

**NR 1.3.3.** Government services will be sited to minimize consumer travel, as laid out in the Capital Facilities Element.

**NR 1.3.4.** Island County will encourage developments and structures with energy conservation technologies.

**NR 1.4.** High intensity lighting is discouraged, but where necessary will require that it must be shielded from adjacent properties and roads and shielded and directed down to reduce impacts to the

dark sky.

## **AIR QUALITY**

### **Goal 2. Preserve a high level of air quality.**

- NR 2.1.** Emphasis will be given to alternative forms of transportation (public transit, car pools, bicycle and pedestrian trails) decreasing dependency on the single occupant automobile.
- NR 2.2.** Promote non-polluting alternatives to wood burning, such as solar heating and chipping instead of burning slash.

## **WETLANDS**

### **Goal 3. Protect wetlands from a net loss in functions.**

**NR 3.1.** Protect, preserve, and enhance wetlands to achieve no net loss of wetland functions.

- NR 3.1.1.** Avoid land development that causes loss of wetland functions. When there is no reasonable alternative, minimize and mitigate adverse impacts to wetland functions.
  - NR 3.1.2.** Mitigation projects that add to existing wetlands or increase functions and values of degraded wetlands are preferred over efforts to create wetlands from non-wetland areas and should remain subject to wetlands protection regulations.
  - NR 3.1.3.** Prohibit alteration of land that results in degradation of Category A wetlands, except for maintenance of existing public use or road or utility crossings that are the least environmentally damaging practical alternative or if necessary to permit reasonable use of the land. In such cases, minimize and mitigate the degradation.
  - NR 3.1.4.** Implement non-regulatory wetlands protection measures such as acquisition and incentive programs and the public benefit ratings system.
  - NR 3.1.5.** Provide continuity of natural systems by establishing protected corridors of native vegetation between wetlands systems using buffer averaging, density incentives, land acquisition, site design and other techniques.
- NR 3.2.** Consider economic, environmental, and cultural costs when evaluating proposals for wetland alterations, and recognize instances where development or alteration within or adjacent to wetlands is acceptable.
- NR 3.2.1.** Allow reasonable use of a property, provided all

wetlands functions are evaluated, the least harmful alternative is pursued, and degraded functions are mitigated, on site as far as possible.

- NR 3.3.** Development will be located away from regulated wetlands by use of buffers and Planned Residential Developments.
- NR 3.4.** Maps, site-specific studies, and information collected by other agencies available for public review will be made readily accessible to potential and existing landowners, interested citizens, and development interests to aid in the protection of these areas.
- NR 3.5.** Alteration will occur only after careful consideration of the function of the area, the potential environmental costs of alterations, the sensitivity of the area to disturbance, and the intensity and potential risks associated with a proposed land use.
- NR 3.6.** When a violation of the policies and regulations of this area is identified, the enforcement action and severity of any penalty will be proportional to the nature and circumstances of the violation and the damage or risk to private and public resources.
- NR 3.7.** Overlay policies and development regulations shall be implemented in addition to those associated with the underlying land use designation. When there is a conflict in policy statements or development regulations, the more restrictive shall apply.

**NR 3.8.** Wetlands regulations are contained in ICC 17.02B and where applicable, ICC 17.05A.

## **FISH AND WILDLIFE HABITAT CONSERVATION AREAS OVERLAY**

### **Goal 4. Protect Fish and Wildlife Habitat Conservation Areas.**

- NR 4.1.** Develop specific criteria and processes to nominate, designate and classify habitats and species of local importance.
- NR 4.2.** Periodically review and update designations as new information on species viability and habitat needs becomes available.
- NR 4.3.** Conserve habitats necessary for continued reproductive success of designated species.
  - NR 4.3.1.** Protect elements necessary to the survival of designated species, including habitat areas such as nests, breeding areas, nurseries from disturbance during critical life cycle periods.
  - NR 4.3.2.** Encourage enhancement of degraded habitat areas.
  - NR 4.3.3.** Based on the recommendations of Biological Site

Assessment or Habitat Management Plan, provide physical buffers or timing restrictions around specific habitat areas used by designated species commensurate to the seasonal use of the area (where that is the case), the sensitivity of the species and habitat, the relative importance of the species and habitat, and the intensity of proposed and actual uses.

**NR 4.3.4.** Landscaping, screening, or vegetated buffers required through development review should retain, salvage, or re-establish native vegetation.

**NR 4.3.5.** Limit the use of non-native and prohibit the use of invasive plant species in Fish and Wildlife Habitat Conservation Areas.

**NR 4.3.6.** Encourage the provision of corridors and networks of native vegetation between protected habitat areas to minimize isolating and fragmenting designated wildlife habitat. Incorporate natural resource lands supporting uses such as forestry and agriculture into wildlife corridors and networks.

**NR 4.3.7.** Consult with State and Federal agencies when making wildlife management and protection decisions.

**NR 4.3.8.** Develop and implement programs to restore, rehabilitate, and acquire important habitat areas.

**NR 4.4.** Protect all streams.

**NR 4.5.** Protect near shore habitats, including commercial and recreational shellfish areas; kelp and eelgrass beds; herring, sand lance and smelt spawning areas.

**NR 4.5.1.** The design of new and replacement on site sewage systems shall meet the minimum requirements outlined in ICC 8.07C and where applicable, meet the siting requirements in ICC 17.05A

**NR 4.5.2.** Require buffers for new development adjacent to streams and marine habitats.

**NR 4.5.3.** Require preparation of farm plans for new agriculture uses in the Commercial Agriculture land use district.

**NR 4.5.4.** Require implementation of best management practices for new and existing agricultural activities.

**NR 4.6.** Maps, site-specific studies, and information collected by other agencies available for public review will be made readily accessible to potential and existing landowners, interested

citizens, and development interests to aid in the protection of these areas.

- NR 4.7.** Regulation of these areas will take into consideration the function of the area, the potential environmental costs of alterations, the sensitivity of the area to disturbance, and the intensity and potential risks associated with a proposed land use.
- NR 4.8.** When a violation of the policies and regulations of this area is identified, the enforcement action and severity of any penalty will be proportional to the nature and circumstances of the violation and the damage or risk to private and public resources.
- NR 4.9.** Overlay policies and development regulations shall be implemented in addition to those associated with the underlying land use designation. When there is a conflict in policy statements or development regulations, the more restrictive shall apply.
- NR 4.10.** Fish and Wildlife Habitat Conservation Areas regulations are contained in ICC 17.02B and where applicable, 17.05A.

### **FREQUENTLY FLOODED AREAS**

**Goal 5. Protect public health, safety, and welfare, to minimize public and private losses due to flood conditions in frequently flooded areas.**

- NR 5.1.** Reduce the potential for physical injury and damage to public and private property from flooding by minimizing impacts of upstream land uses.
  - NR 5.1.1.** Protect natural water storage areas and drainage systems, including wetlands, streams and lakes, to reduce downstream flooding.
  - NR 5.1.2.** Ensure new development above identified thresholds minimizes additional runoff by limiting impervious surfaces, unnecessary grading and compaction of soils, and preserving areas of undisturbed vegetation.
  - NR 5.1.3.** Ensure new development above identified thresholds is accompanied by appropriate stormwater facilities, such as detention ponds, infiltration facilities, and other measures to maintain rates of runoff at pre-development levels.
  - NR 5.1.4.** Impose standards for construction in frequently flooded areas to minimize the potential for physical injury and property damage.
- NR 5.2.** Maps, site-specific studies, and information collected by other agencies available for public review will be made readily accessible to potential and existing landowners, interested

citizens, and development interests to aid in the protection of these areas.

- NR 5.3.** When a violation of the policies and regulations of this area is identified, the enforcement action and severity of any penalty will be proportional to the nature and circumstances of the violation and the damage or risk to private and public resources.
- NR 5.4.** Development regulations shall be implemented in addition to those associated with the underlying land use designation.
- NR 5.5.** The County's Surface Water Program will continue to work to review drainage, flooding, and stormwater run-off in the area and nearby jurisdictions to provide guidance for corrective actions to mitigate or cleanse those discharges that pollute waters of the state
- NR 5.6.** Regulations for frequently flooded areas are contained in the ICC 17.02B, as well as ICC 17.05A for the FEMA designated 1% flood zone.

#### **GEOLOGICALLY HAZARDOUS AREAS (STEEP/UNSTABLE SLOPES)**

#### **Goal 6. Protect the public health, safety, and welfare from threats resulting from incompatible development being sited on or near steep and/or unstable slopes.**

- NR 6.1.** Minimize damage to life, health, property, and natural resources caused by geological processes.
  - NR 6.1.1.** Require thorough geotechnical investigation of localized conditions during the review of proposed development within areas of steep/unstable slopes. The amount of information required will be proportionate to the severity of the geologic hazard and the susceptibility of the proposed development.
  - NR 6.1.2.** Encourage, and where appropriate, require use of special engineering, site design, and modified construction practices.
  - NR 6.1.3.** Prohibit activities and land uses which cause or exacerbate existing hazardous geological conditions.
- NR 6.2.** Maps, site-specific studies, and information collected by other agencies available for public review will be made readily accessible to potential and existing landowners, interested citizens, and development interests to aid in the protection of these areas.
- NR 6.3.** Regulation of these areas will take into consideration the sensitivity of the area to disturbance, and the intensity and potential risks associated with a proposed land use.

- NR 6.4.** When a violation of the policies and regulations of this area is identified, the enforcement action and severity of any penalty will be proportional to the nature and circumstances of the violation and the damage or risk to private and public resources.
- NR 6.5.** Overlay policies and development regulations shall be implemented in addition to those associated with the underlying land use designation. When there is a conflict in policy statements or development regulations, the more restrictive shall apply.
- NR 6.6.** Steep and unstable slope regulations are contained in ICC 17.02B.

## **WATER RESOURCES**

**Goal 7. Manage and protect ground water and provide for resource protection through a common goal of non-degradation for existing and future residents of Island County.**

- NR 7.1.** Protect the quantity and quality of groundwater resources for existing and future residents of Island County.
- NR 7.1.1.** Provide incentive programs to encourage participation in water conservation and aquifer recharge area protection programs.
- NR 7.1.2.** No development shall be allowed in areas of known ground water limitations as determined by the Health Department, unless it can be proven through objective well tests not to diminish water supplies or reduce water quality for existing users, per ICC 8.09 and related policies.
- NR 7.1.3.** Continue to carefully evaluate the hydrogeologic setting when making decisions on potentially contaminating land uses, and require use of Best Management Practices, hazardous material management plans, and other tools to help prevent contamination of ground water.
- NR 7.2.** The County will promote the retention and reuse of stormwater when it is the best and environmentally correct option.
- NR 7.3.** Public education concerning water conservation will be a continuing high priority.
- NR 7.4.** Reuse of water, recharge of aquifers and alternative storage systems will be encouraged.

**Goal 8. Protect aquifer recharge areas from contamination and insure long term recharge potential.**

- NR 8.1.** Consider acquisition of areas with particular value to ground water recharge.
- NR 8.2.** Continue efforts to identify areas with ground water problems such as seawater intrusion, groundwater depletion, and contamination from surface activities.



- NR 8.2.1.** Continue implementing data collection and analysis efforts as recommended in the Ground Water Management Program.
- NR 8.2.2.** Work with the Island County Health Department, Washington Departments of Health and Ecology to make best use of available data and new technology.
- NR 8.2.3.** Use site-specific data as it becomes available to determine locations of important recharge areas, areas of limited ground water availability, and areas of particular vulnerability to contamination from surface activities. Maintain, update, and coordinate this data to make the most effective use of the available information.

**Goal 9. Ensure that Island County plans and develops in a manner that utilizes the best available information regarding water resources so that the resource will be preserved for current and future use.**

- NR 9.1.** Maps, site-specific studies, and information collected by other agencies available for public review will be made readily accessible to potential and existing landowners, interested citizens, and development interests to aid in the protection of these areas.
- NR 9.2.** Watershed management planning will be cognizant of the need to preserve water supply while providing drainage facilities to protect the welfare and safety of the community.
- NR 9.3.** Development plans will contain plans for facilities to mitigate the impacts of increased runoff, stormwater drainage and flooding.
- NR 9.4.** The location and design of development will be carefully guided in order to minimize potential adverse impacts on the quality of ground and surface waters.
- NR 9.5.** Land use patterns and practices conserving the integrity of the natural watershed system will be encouraged.

**Goal 10. Natural Lands Conserve a variety of natural lands, in both public and private ownership, for the enjoyment and economic benefit of current and future residents of Island County.**

- NR 10.1.** Balance public and private interests in land.
  - NR 10.1.1.** Correct any imbalance in public policies between open space protection and land development incentives through sound incentives for land conservation and careful analysis of the equity and real costs, both financial and environmental, of

subsidizing development.

**NR 10.1.2.** Only consider divestment in publicly owned open lands and resources if careful analysis shows that they contain little value as public conservation or recreational land.

**NR 10.1.3.** The proceeds from the selling or trading of publicly owned open lands and resources should be reinvested in conservation of land and resources, either directly or through a dedicated fund that yields continuing income streams devoted to land conservation.

**NR 10.1.4.** Respect property rights when developing regulations and policies around land conservation.

**NR 10.1.4.1.** Ensure that the designation of natural lands does not infringe on individual property rights.

**NR 10.1.5.** Develop objective criteria to prioritize public expenditures for the acquisition of fee simple or other interests in natural lands.

**NR 10.2.** Identify funding sources for the acquisition or protection of natural lands in accordance with the Parks and Recreation Element

**Goal 11. Prioritize the protection of natural lands that coincide with other valuable resources, including ecological, historical, agricultural, recreational, and cultural lands.**

**NR 11.1.** Maintain the important ecological functions and values of natural landscapes such as wetlands, stream corridors, shoreline systems and forests.

**NR 11.1.1.** Develop land use regulations and strategies such as cluster development and wetlands buffer requirements to identify and preserve important natural lands areas located on sites proposed for development.

**NR 11.1.2.** Prioritize the protection of natural lands that contain historic or archaeological sites, structures and landscapes which are important to local culture and retain the county's rural quality and character.

**NR 11.2.** Conserve agricultural lands for the continued profitable production of crops, timber and livestock.

**NR 11.2.1.** Discourage the conversion of properties identified as having prime farmland soils to non-agricultural uses.

**NR 11.2.2.** Look into possible strategies for protecting agricultural uses and maintaining the economic viability and sustainability of existing farms.

**NR 11.3.** Enhance recreational opportunities for County residents.

**Goal 12. Protect natural, scenic, cultural, and historic lands as community assets.**

**NR 12.1.** Maintain Island County's natural lands and open space to protect health and welfare, enhance the quality of life, preserve heritage, promote economic vitality and reduce the burden on government resources.

**NR 12.2.** When converting land to a use that requires water availability, Island County will prohibit major alterations to the land beyond the minimum necessary to do soil and water testing prior to the issuance of a water right or other state or local authorized evidence of adequate potable water.

**NR 12.3.** Ensure residents have adequate access to open space areas, including land that contains natural areas, habitat lands, natural drainage features, and/or other environmental, cultural, and scenic resources.

**Goal 13. Continue to promote active public involvement in the conservation or protection of important natural lands.**

**NR 13.1.** Foster enduring voluntary land conservation through government assistance such as income and estate tax benefits, technical assistance grants and programs to purchase partial land interests.

**NR 13.1.1.** Continue implementing the Public Benefit Rating System as a property tax reduction incentive program for property owners to conserve open space.

**NR 13.1.2.** Maintain existing current use taxation programs for designated forest and agricultural lands.

**Goal 14. Continue an open dialogue between Island County, incorporated jurisdictions, special purpose districts, non-profits, and other interested individuals and organizations working toward the conservation or protection of natural lands.**

**NR 14.1.** Establish and maintain partnerships with State and Federal agencies, cities, towns, private non-profit conservation groups, port districts, school districts, tribes, foundations, corporations and individuals for the purpose of acquiring or protecting natural lands.

- NR 14.2.** Design and implement education programs to promote the benefits of conserving natural lands, and to introduce available and proposed current use taxation programs.

## **RESOURCE LANDS**

**Goal 15. Protect existing and ongoing resource management operations and preserving long- term commercial viability of those uses.**

### **RURAL FOREST**

- NR 15.1.** Measures shall be used to support silviculture industries.
- NR 15.2.** Encourage the conservation of lands suitable for forestry use and support forestry as an activity valued in the County.
- NR 15.3.** Cluster development or encourage low intensity uses to minimize site clearing and maintain future forestry use options
- NR 15.4.** Encourage forestry landowners to retain their lands in timber production and to utilize tax incentive programs.
- NR 15.5.** Support innovative public and private programs that provide foresters incentives to stay on the land.
- NR 15.6.** Encourage selective clearing and logging, as opposed to clearcutting, if forest harvesting is done in the Ebey's Landing National Historical Reserve.

### **COMMERCIAL AGRICULTURE**

- NR 15.7.** Achieve agricultural preservation through:
- NR 15.7.1.** Right to farm and forest measures which protect the right to pursue farm and forestry activities.
  - NR 15.7.2.** Support the continuation of preferential tax programs.
- NR 15.8.** Encourage an effective stewardship of the environment to conserve and protect Commercial Agriculture lands.
- NR 15.8.1.** Prevent or correct agricultural practices that produce non point source pollution of surface and groundwater.
  - NR 15.8.2.** Take measures to minimize adverse impacts of agricultural activities.
- NR 15.9.** Protect agricultural operations from incompatible uses by using measures including, but not limited to:
- NR 15.9.1.** Ensuring that uses on adjacent lands do not interfere with continuing agricultural good management practices on resource lands;

**NR 15.9.2.** Setbacks and buffer strips should be on land within the development unless an alternative is mutually agreed on by adjacent landowners; and

**NR 15.9.3.** Public education concerning resource activities and the common benefits derived from them.

**NR 15.10.** Protect and promote related development such as farmers markets and roadside stands, cooperative marketing, and value added products, etc.

**NR 15.11.** Strengthen public disclosure of current adjacent agricultural activities by means of a "right to farm" notice on the deed, area maps, etc.

**NR 15.12.** Support the continued existence of agricultural lands by means of tax incentives or other appropriate financial aid or incentives.

**NR 15.13.** Coordinate agricultural land preservation policies with other jurisdictions, special districts and their respective programs.

**NR 15.14.** Coordinate agricultural land preservation policies with other County wide Planning Policies through:

**NR 15.14.1.** Correlating agricultural land preservation policies with Urban Growth Area policies and with public facility and service provision policies to prevent the extension of urban services to areas intended for continued agricultural use;

**NR 15.14.2.** Ensuring that public facility and service extension, even if not directly serving the agricultural lands, do not stimulate the conversion of agricultural land or make its preservation and protection more difficult.

**NR 15.15.** In order to assure the rights of agricultural land owners and to provide them reasonable flexibility to modify classification of their land, owners of agricultural land may request change of agricultural lands classification under certain circumstances.

**NR 15.16.** Cooperative agricultural production and marketing will be encouraged.

## **MINERAL LANDS**

**NR 15.17.** Maintain and enhance natural resource based industries.

**NR 15.17.1.** Assure conservation of mineral resource lands.

**NR 15.17.1.1.** Assure that the use of lands adjacent to mineral resource lands do not interfere with the continued use,  
in accordance with best management

practices, of lands designated for the extraction of minerals.

**NR 15.17.1.2.** Assure that the excavated land will have an ultimate economic use which will complement and preserve the value of adjoining land.

**NR 15.17.1.3.** Maintain the contribution of mining and processing operations to the Island County employment base.

**NR 15.17.2.** Island County will provide for title or plat notification for property owners within 300 feet of an existing approved mining operation.

**NR 15.17.3.** Regulate surface mining operations to minimize land use conflicts through the conditional use process.

**NR 15.17.4.** Apply standards which consider noise levels, light pollution, dust, visual screening, transportation impacts, hours of operation, water quality and groundwater protection and consumption, to new and expanding mine operations.

**NR 15.17.5.** Encourage the purchase of development rights, by the mine developer, of the area within 300 feet of the proposed mine, thus limiting use within that area to forestry, agricultural or designated open space, for the life of the mining operation.

**NR 15.18.** Allow extractive industries to locate where prime natural resource deposits exist, provided these sites are separated by buffers from existing residential areas and restored for appropriate reuse after removing the resource material.

**NR 15.19.** Discourage new residential uses from locating near active extractive sites, unless the residential developer provides adequate buffering.

**NR 15.20.** Operation of new and expanding sites will be regulated by land development standards to ensure proper siting and to minimize environmental impacts during operation.

**NR 15.21.** There is no minimum parcel size for existing operations. Future commercial sites generally should be 10 acres or greater to provide for adequate screening. Future small scale operations such as borrow pits may be less than 10 acres.

**NR 15.22.** On sites with disturbed areas of three acres or less, site reclamation will be carried out as soon as practical, as phased operations are completed, to prevent erosion and water quality degradation, and to return the site to a natural state.

Reclaimed sites can be used for any of the uses permitted in the underlying land use designation.

- NR 15.23.** Surface mining is not considered to be a permanent use of the land. The land should be utilized consistent with the long term plans of the community, and mining allowed based upon performance standards.
- NR 15.24.** Overlay policies and development regulations shall be implemented in addition to those associated with the underlying land use designation. When there is a conflict in policy statements or development regulations, the more restrictive shall apply.
- NR 15.25.** Island County shall notify adjacent landowners of the existence of a surface mine and to the extent known, undeveloped mineral resources, acknowledging that surface mining is market dependent, and operations may be intermittent and more or less intense at times.

## MRC comments on Historic Preservation, Element 5 of the Comprehensive Plan

Every Marine Resources Committee (MRC) meeting begins with a Land and Sea Acknowledgement: “We acknowledge the lands we’re on today are the ancestral and current homelands of Indigenous Nations who have stewarded them since time immemorial. We respect their sovereignty, support their Treaty rights, their right to self-determination, and we honor their sacred spiritual connection with the land and water...” We are not just reciting this Land and Sea Acknowledgement – we are reminding ourselves that we share these lands with the Coast Salish people, and that they were here before colonization.

In light of this acknowledgement, it was surprising to us to read that the Historic Preservation element of the Comprehensive Plan (CP) concentrates on Ebey’s Landing National Historical Preserve, focusing on the historic record beginning with Vancouver’s exploration of the area in 1792 and the first permanent settlement by Issac Ebey.

Applying the Land and Sea Acknowledgement to policy, we propose that the Historic Preservation element of the CP affirm the great historic impact resource-use practices and values (regarding marine and land resources) of Coast Salish People have had on Whidbey and Camano islands and the positive example they set for current and future land use planning.

This can be done through augmentation of Goal #1 but is better addressed through the addition of a new Goal #3 that speaks to the contribution of Indigenous people “farming” the land and “using aquaculture” in the tidelands, establishing shellfish gardens at the nearshore, and hunting and fishing in these lands and waters since time immemorial. The Coast Salish people’s practices preserved natural resources with a goal that the resources could be a reliable source of sustenance and spiritual inspiration “for the next 7 generations”. Our current practices can benefit from this history of long-term thinking, conservation attitude, and spiritual connection with the land and water.

In crafting a new Goal #3, the CP should recognize that current and historic marine and land use practices have impacted marine resources, and acknowledge that conservation practices by Coast Salish People have had a positive influence. Implementation of a new Goal #3 can be through acknowledgement of these historic practices through educational programs, interpretive signage, and awareness that adoption of Native American practices can lessen the impact of human habitation.

While Goal #3 may be aspirational, it can guide the choices built into the CP so that Island County can maintain its rural and marine character for the future. The new Goal should include setting time horizons that specifically reference the Native American goal of considering the impact of actions to progeny born 7 generations from now. For education and awareness purposes, the CP should reference “time immemorial” as the time horizon for documenting the influence that Coast Salish people have had on these lands and waters.



Goal # 2 in the Historic Preservation section that relates to preserving archeological evidence of Indigenous People is important but is too limited. It is focused solely on viewing the history of habitation by Indigenous People through artifacts which are left behind. History that relies on artifacts to appreciate and preserve the Indigenous People's way of life as they stewarded these lands is too limited because, in fact, the very stewardship practices of the Indigenous People were to waste as little as possible and to NOT leave a footprint of ecological disturbance.

As the MRC says in the land and sea acknowledgement, we are also concerned with "current homelands" of Indigenous Nations. This statement compels us to suggest that the new Goal #3 is needed to incorporate the land and water stewardship in the manner of Indigenous People into the Historic Preservation section. Detailing how to live on the land and shoreline without leaving indelible evidence of habitation is a worthy goal particularly in terms of preservation of marine resources.

The history of the Coast Salish people must involve and embrace living history through stories and culture that is passed down by word of mouth, songs, and the languages spoken. For this reason, consultation with current tribal leadership should be part of the CP's process in crafting this section. The MRC is not qualified to speak on behalf of Coast Salish People, but we feel strongly that their involvement will benefit Island County.

Respectfully submitted by the Island County Marine Resources Committee

## **Recommendations for Comp Plan Economic Development Element from a Marine Resources Perspective 6.28.24**

### **INTRODUCTION TO RECOMMENDATIONS**

This memo suggests policy considerations for the **ECONOMIC DEVELOPMENT** Element in the new Island County Comprehensive Plan (CP) with consideration for the county's marine characteristics.

We propose that the introduction and body of the Comprehensive Plan's Economic Development Element emphasize the importance of Marine Resources for the county's overall economic future in light of:

- distinct marine characteristics of Island County are derived from the fact that County is made up of islands and surrounded by marine waters;
- healthy and vital shorelines, wetlands, tidelands and marine waters contribute to human health, recreation, foraging and overall quality of life and support essential drivers for the county's economic vitality and economic plans;
- economic planning that takes into consideration changes in climate, sea level, availability of drinking water, shoreline safety and emerging flood prone areas will assure resilience in short and long-term economic plans.

We also suggest the introduction and body of this Element identify State, County, Port District and City Parks as economic development assets and economic development drivers. In light of their importance to the county, we recommend the Comprehensive Plan for this Element encourage collaboration with the State, County, Port District and City Park systems to maintain these valuable assets in the face of necessary changes, adjustments and investments to address extreme tidal and storm events and aging infrastructure.

Finally, we recommend three goals be added for consideration to the Comprehensive Economic Development Strategy (CEDS) which is still under review and not yet adopted by the County Commission. While the final CEDS plan has not yet been adopted by the County Commission, it does provide current information about economic conditions, goals and policies, and strategies. We recommend that the CEDS proposed goals and policies provide the starting point for the updated Element. (For ease of reference, we have listed the CEDS goals with our recommended additions in the ending pages of this comment paper.)

The CEDS document addresses three themes that interface with marine resources:

- The CEDS goals overall emphasize the interrelationship of the various elements of the comprehensive plan including land use, natural resources, and infrastructure, and the key role of marine resources underlying each of them.
- CEDS Goal 1 stresses the importance of protecting and improving the resilience of critical infrastructure. In anticipation of changing climate conditions, sea level rise and fresh water availability, we recommend the following additional goal:

***Recommended addition: 1.12. Plan for infrastructure improvements and expansions in anticipation of increasing potential for upland and marine flooding due to growing intensity of storms and droughts and extremes in tides.***

- CEDS Goal 2 stresses support of local businesses and fostering an attractive business environment. We recommend the following additional goal:

***Recommended addition 2.11. Explore options for expedited, transparent permitting process for green, sustainable projects, particularly those in agriculture, energy, and maritime/maritime trade sectors. Also give particular attention to any projects that improve public access to the shoreline.***

- CEDS Goal 4 stresses the importance of maintaining the natural beauty and natural resources of the county. Recognizing these resources are critical natural and economic assets that attract and retain residents and visitors and support a range of economic activities including the tourism industry, maritime industries, and various green industries (environmental-based sectors, we recommend the following additional goal:

***Recommended addition 4.9. Support innovation in promoting eco-tourism that combines conservation goals with tourist activities.***

Recognizing these areas of overlap between Economic Development and marine resources, recommendations in this memo are submitted with the hope to:

- inform on-going revision and updating of the new CP re: marine resources and marine pressures,
- support policies that advance goals laid out in the CP re: marine considerations and
- suggest strategies to make policies critical to marine considerations actionable and effective.

Thank you for your consideration.

Respectfully submitted,

Island County Marine Resources Committee:

Jill Lipoti, Chair

Comp Plan Team: Barbara Bennett, Lead   Greg Easton   PaulBen McElwain

Other Members: Kelly Webb, Vice Chair   Scott Chase   Ken Collins   Patrick Havel  
 Andi Kopit   Kirk Larsen   Kes Tautvydas

\* These and more are elaborated in the MRC White Paper: *Emerging Hazards, Challenges and Opportunities Facing Island County related to Climate Change* submitted to the BOCC on 12.20.23.

**Recommended Goals and Policies Based on Island County CEDS 2024-2028 Draft 4/15/2024 Goals and Subgoals with modifications noted in italics.**

**CED Goal 1. Improve and develop resilient critical infrastructure.**

1. Improve and expand water and wastewater infrastructure.
2. Improve and expand cellular and internet services to unserved and underserved areas and populations.
3. Improve and expand local emergency services to all areas of Island County.
4. Advocate for consistent and reliable ferry services.
5. Promote the use of Public Transportation (Island Transit) and Active Transportation (pedestrian, bicycle, other).
6. Improve paved roads throughout Island County for all users.
7. Explore and support options to increase energy resiliency.
8. Explore programs and expansion opportunities for solid waste, recycling, and composting services.
9. Maintain existing healthcare services and facilities and explore opportunities for generating additional and varied healthcare services and facilities, including mental health services with a focus on unserved and underserved communities.
10. Work with public, private, and nonprofit partners to inform, assist, and invest in the development of affordable housing choices for all income levels.
11. Promote and support affordable and accessible quality childcare options for all income levels in Island County for all income levels.

***Recommended addition: 1.12. Plan for infrastructure improvements and expansions in anticipation of increasing potential for upland and marine flooding due to growing intensity of storms and droughts and extremes in tides.***

**CED Goal 2. Support existing local businesses and community assets, increase diversification, and promote Island County as an attractive business environment.**

1. Support local governments and economic development service providers in creating responsive, helpful, and expedient services and resources.
2. Promote Island County as a great place to do business.
3. Continue to support existing businesses.
4. Explore options to recruitment of employers that complements, and leverages, the existing industry mix and aligns with local values.

5. Promote and support innovation and value-added upgrading in key economic sectors of agriculture, construction, military / defense, marine trades, tourism, and advanced manufacturing.
6. Strengthen and better define and build entrepreneurial resources in order to create opportunities for mentoring, financing, exporting, legal and tax services, and networking.
7. Support the creation of shovel-ready commercial, residential, and industrial sites in locations that are not in critical areas or habitats.
8. Continue to support Embrace Whidbey and Camano Islands (county-wide Tourism).
9. Explore options to conduct or participate in economic impact studies for key sectors of Island County's economy.
10. Promote and support the development of local financial resources and financial literacy for businesses.

***Recommended addition 2.11. Explore options for expedited, transparent permitting process for green, sustainable projects, Particularly those in agriculture, energy, and maritime/maritime trade sectors. Also give particular attention to any projects that improve public access to the shoreline.***

**CED Goal 3. Align quality education and skills training programs with employer needs and create living wage job opportunities in Island County.**

1. Continue to participate in regional workforce partnerships and organizations.
2. Address ongoing labor shortages in several industries by focusing on unserved and underserved worker groups.
3. Improve education attainment outcomes and create opportunities for all to prosper.

**CED Goal 4. Sustainably manage the natural beauty and resources of Island County.**

1. Prioritize actions for climate resilience.
2. Support, promote, and educate the public on required adaptations to sea level rise.
3. Develop additional local incentives for forest, wetland, and farmland conservation.
4. Support and promote the development of the Green and Blue economies.
5. Support opportunities for salmon habitat restoration and rehabilitation.
6. Support and promote improvements in Island County's public lands, reserves, and parks.
7. Prepare for population growth and in-migration.
8. Promote and support increased disaster preparedness among small business owners and entrepreneurs.

***Recommended addition 4.9. Support innovation in promoting eco-tourism that combines conservation goals with tourist activities.***

**CED Goal 5. Deepen collaboration and coordination between Island County and regional partners.**

1. Further develop relationships with regional economic development agencies and strategic associate development organization (ADO) partners.
2. Explore opportunities for collaboration and business support in Stanwood and Anacortes.
3. Explore opportunities for developing the creative economy across Snohomish, Skagit, and Island Counties.
4. Explore opportunities to enhance disaster preparedness and resiliency between Island, Skagit, and Snohomish Counties.
5. Explore additional opportunities for equipment and technology sharing between Island, Skagit, and Snohomish Counties.

## **Recommendations for Comp Plan Capital Facilities Element from a Marine Resources Perspective 7/17/24**

This memo suggests policy considerations for the **Capital Facilities** Element in the new Island County Comprehensive Plan (CP) with consideration for the county's marine characteristics.

The following comments and recommendations are presented on behalf of the Island County Marine Resources Committee (MRC), a diverse group of volunteers with wide a wide range of skills, formal training and professional experience pertinent to the MRC's purpose to protect and restore Island County's marine resources.

Because marine resources are integrally tied to emerging changes in marine and climate patterns, and these changes impact long-term planning for County facilities and, ultimately, impact human health, equity and climate resilience, our comments are framed in light of these of many changing marine and climate patterns:

- Intensifying storms, upland flooding and stormwater runoff
- Rising sea level, marine flooding, extreme tidal events, and marine water quality
- Cycles of extreme drought and heat, risks for sea water intrusion of wells and decreases in freshwater recharge.

We recognize that Capital services must be tailored to suite County needs across all County functions and appropriate policies must be incorporated in the planning process for each type of capital facility. The MRC is submitting recommendations for each Element of the CP and, as Capital projects may be launched, we encourage consideration of MRC recommendations already submitted to the Comp Plan team for comments and recommendations regarding the impact of marine and climate issues on projects tailored for specific other Elements.

***There is one procedural goal that we recommend be added for ALL capital planning, projects and operations.*** We anticipate integration of this goal into all Capital activities will:

- advance effective, efficient, forward-looking Capital Plans
- avoid costs by minimizing climate risks and increasing climate resiliency
- simultaneously support County goals related to health, equity, and climate resilience.

***We recommend addition of the following new goal for the Capital Facilities Element:***

***In planning, investment and operation of all capital projects, use predictive models to anticipate impacts of climate change, address risks and increase resiliency in relation to specific marine and climate challenges including: storm water flooding, freshwater quality and sufficiency, marine water quality, sea level rise and coastal flooding, and seek solutions that also address health, equity and public access to the shore.***

Thank you for your consideration.

Respectfully submitted,

Island County Marine Resources Committee:  
Comp Plan Team: Barbara Bennett, Lead  
Other Members: Kelly Webb, Vice Chair

Jill Lipoti, Chair  
Greg Easton PaulBen McElwain  
Scott Chase Ken Collins Patrick Havel  
Andi Kopit Kirk Larsen Kes Tautvydas

**Recommended Goals and Policies (Based on 2016 Comp Plan with changes noted in italics).**

Goal 1. Establish Level of Service (LOS) Standards for each type of capital facility and determine what capital improvements are needed in order to achieve and maintain the standards for existing and future populations and to repair or replace existing capital facilities.

Goal 2. Ensure the costs of County-owned capital facilities are within the County's funding capacity, and fairly distributed between users and the County in general.

Goal 3. Provide adequate capital facilities by constructing needed capital improvements which repair or replace obsolete or worn out facilities, eliminate existing deficiencies, and meet the needs of future development and redevelopment caused by previously issued and new development permits. The County's ability to provide needed improvements will be demonstrated by maintaining a financially feasible schedule of capital improvements in this Capital Facilities Plan (CFP) and the Capital Improvement Program (CIP).

Goal 4. Implement the Capital Facilities Element in a manner that coordinates and is consistent with the plans and policies of other Elements of the Island County Comprehensive Plan, the Countywide Planning Policies (CWPP), and the Growth Management Act of the State of Washington. Where possible, the Capital Facilities Element will also coordinate and be consistent with the plans and policies of other regional entities, adjacent counties, and municipalities.

***Recommended New Goal 5.:***

***In planning, investment and operation of all capital projects, use predictive models to anticipate impacts of climate change, address risks and increase resiliency in relation to specific marine and climate challenges including: storm water flooding, freshwater quality and sufficiency, marine water quality, sea level rise and coastal flooding, and seek solutions that also address health, equity and public access to the shore.***

Goal 6 (previously Goal #5) Implement programs to ensure that the goals and policies established in the Capital Facilities Element will be achieved or exceeded and that the necessary capital improvements will be constructed. Each implementation program will be adopted by ordinance as appropriate for each implementation program.

Goal 7 (Previously Goal #6). Provide for the siting of essential public facilities.

Goal 8 (Previously Goal #7). Ensure that those public services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current LOS below locality established minimum standards.



Date: 5.30.24  
To: Island County Comprehensive Plan  
From: Island County Marine Resources Committee

Re: **Recommendations for Comp Plan PARKS Element from a Marine Resources Perspective**

## **INTRODUCTION TO RECOMMENDATIONS**

This memo suggests policy considerations for the **PARKS** Element in the new Island County Comprehensive Plan (CP) with consideration for the county's marine characteristics.

We suggest emphasizing marine conservation as a strategy that will support overarching County goals for health, equity and climate, and complement long-standing PARKS and RECREATION goals and priorities articulated in the 2016 Island County Comprehensive Plan, should they continue in the next CP (especially Goals 2,3,4,6 and 9 and Terminology and Definitions in section 7.1.2).

Marine characteristics present challenges and limitations that deserve focused attention as the County faces increasing pressure to build close to and alter its shoreline, bluffs and watersheds. Limitations and threats of special consideration for island settings include increasing potential for upland and marine flooding due to growing intensity of storms and droughts and extremes in tides. (These and more are elaborated in the MRC White Paper: *Emerging Hazards, Challenges and Opportunities Facing Island County related to Climate Change* submitted to the BOCC on 12.20.23.)

Creation of parks in locations vulnerable to impacts of climate change would have the potential to simultaneously address health, equity, safety, resilience, conservation, open spaces and public access all allowing for marine limitations and potential threats. PARKS policies designed to support adaptive management will make goal focused outcomes possible in these dynamic locations.

Recognizing that there are some areas of overlap between Parks and marine resources, recommendations in this memo are submitted with the hope to:

- inform on-going revision and updating of the new CP re: marine resources and marine pressures
- support policies that advance goals laid out in the CP re: marine considerations
- suggest strategies to make policies critical to marine considerations actionable and effective

## **RECOMMENDATIONS related to PARKS CP Element:**

1. Define "public" and "public access" to include non-owners as well as owners of island properties.

### ***Rationale:***

- increase awareness and frame language and policy to foster equity in access to outdoor recreation;
- support tourism by encouraging visitors to come to Island County for the benefits of open space.

2. Inventory historically designated public access sites to the shoreline (road ends, historic ferry landings, etc.) and manage them as mini public parks wherever possible with signage (from land and shore), sufficient on site or nearby parking, trails (as possible) and appropriate warnings re: safety and decorum in neighborhoods and environmentally respectful practices to avoid degradation.

### ***Rationale:***

- increase equity by expanding public access to the shoreline in accord with the

Public Trust obligations

- support the tourism component of economic development and enhance the attraction to the County by adding sites for outdoor recreation for residents and visitors
- increase public safety by identifying and making accessible locations for access and egress from marine waters needed for general recreation and for kayaking, swimming, and other uses as permitted i.e. crabbing and shellfish harvesting.

3. As sea level rises, there may be opportunities to reclassify flood-prone land that has formerly supported residential or commercial uses as public open space if people relocate their homes and businesses. Create an overlay based on publicly available mapping projections for where parks might evolve as a solution to repeated flooding events. Inventory flood prone areas, designate them as protected natural lands, discourage new or continuing development in these areas and encourage retreat of all structures from these areas.

**Rationale**

- increase human safety and infrastructure resilience
- increase environmental protection of sensitive areas
- reduce risks and expenses related to infrastructure and utilities
- increase areas for public access to open spaces and for non-motorized recreation
  - support pro-active, adaptive policy management by setting goals and tracking progress

4. While maintaining the balance between traditional recreation focus and habitat conservation focus, consider ways to increase parks and uses in parks to safely enhance public access and carefully selected non-motorized outdoor recreation with signage, parking (pervious surfaces), trails and benches.

**Rationale:**

- increase equity by expanding public access to the shoreline in accord with the Public Trust obligations
- support the tourism component of economic development and enhance the attraction to the County by adding sites for outdoor recreation for residents and visitors
- provide signage to explain the myriad benefits of outdoor recreation to physical and mental health
- explain through signage the myriad benefits of habitat conservation, including:
  - enhanced aquifer recharge and stormwater management
  - protection of fresh and marine water quality
  - fostering natural settings that support biodiversity and vegetation that supports pollinators in fresh and marine systems
  - creation of natural buffers that will increase human safety and infrastructure resilience in the face of stormwater surges, extreme tides, sea level rise and seawater intrusion
- increase natural open spaces for public access and carefully selected non-motorized recreation

5. Increase use of parks and educational public outreach by encouraging community science in IC parks to measure progress against national and international targets for increasing biodiversity.

**Rationale:**

- i. The US has agreed to certain targets for increasing biodiversity in the Kunming-Montreal Biodiversity Framework. <https://www.cbd.int/gbf/targets>

- ii. Often referred to by the abbreviation “30 by 30”, one of the targets states: *Ensure and enable that by 2030 at least 30 percent of terrestrial and inland water areas, and of marine and coastal areas, especially areas of particular importance for biodiversity and ecosystem functions and services, are effectively conserved and managed through ecologically representative, well-connected and equitably governed systems of protected areas and other effective area-based conservation measures, recognizing indigenous and traditional territories, where applicable, and integrated into wider landscapes, seascapes and the ocean, while ensuring that any sustainable use, where appropriate in such areas, is fully consistent with conservation outcomes, recognizing and respecting the rights of indigenous peoples and local communities, including over their traditional territories.*
- iii. This kind of measurable target can be useful in showing progress and can be rolled into the WA target numbers so that the US can show progress toward the international goal.

Respectfully submitted,

Island County Marine Resources Committee

Jill Lipoti, Chair

Comp Plan Team:

Barbara Bennett Greg Easton PaulBen McElwain

Other Members:

Kelly Webb, Vice Chair

Scott Chase Ken Collins Patrick Havel Kirk Larsen Andi Kopit Kes Tautvydas

## **Recommendations for Comp Plan Transportation Element from a Marine Resources Perspective 7/19/24**

This memo suggests policy considerations for the **Transportation** Element in the new Island County Comprehensive Plan (CP) with consideration for the county's marine characteristics.

These comments are presented on behalf of the Island County Marine Resources Committee (MRC) whose members are volunteers, all appointed by the Board of County Commissioners. Members of the MRC bring a wide range of pertinent formal training and professional experience to the MRC's purpose to protect and restore Island County's marine resources.

Our comments are framed in light of changing marine and climate patterns, particularly:

- Intensifying storms, upland flooding and stormwater runoff
- Rising sea level, marine flooding, and extreme tidal events.

For supporting documentation, see the MRC White Paper: Emerging Hazards, Challenges and Opportunities Facing Island County related to Climate Change submitted to the BOCC on 12.20.23: <https://www.islandcountymrc.org/media/21254/20231106-mrc-climate-change-white-paper.pdf>

We recommend proactive anticipation of potentially damaging extreme events to minimize risks for damage and loss, to foster climate resiliency and to protect investments in transportation infrastructure.

***We recommend addition of one new goal for all Transportation planning, projects and operations:***

***In all future planning, investment and operation of transportation projects and services, use predictive models to anticipate impacts of climate change, address risks and increase resiliency in relation to marine and climate challenges including: storm water flooding, sea level rise and coastal flooding, and seek solutions that address health, equity and public access to the shore.***

We anticipate integration of this goal will:

- advance forward-looking Plans for transportation services,
- minimize climate risks and increase climate resiliency, and
- support County goals related to health, equity, and climate resilience.

**We recommend a number of additions to Goal No.4, which reads in the 2016 Comprehensive plan:  
Minimize negative environmental impacts.**

Our recommended additions speak to the importance of:

- an intact and functional shoreline ecosystem as a major asset of the County,
- strategies to augment resilience and minimize risks of shoreline infrastructure and
- engaging the public to assure public understanding and to develop a supportive political will for project plans and costs.

4.1 Foster transportation investments that avoid negatively impacting critical areas;  
*Consider adding: fostering investments that would correct transportation investments that are already negatively impacting critical areas and work to restore natural processes that enhance the marine environment through sediment transport or other processes that restore or enhance eelgrass and kelp beds for optimal forage fish habitat.*

4.2 Follow the County’s established best management practices for stormwater runoff during construction of transportation infrastructure;

*Consider adding a specific reference to modeling future storm impacts to transportation infrastructure.*

4.3 Identify potential environmental constraints and impacts as early as possible in the conceptual design phase of new transportation projects in order to minimize costly mitigation measures and expedite the delivery of transportation services and facilities;

*Involve stakeholders at the early stages of design to incorporate their lived experience with local micro-ecology. Specifically, reach out to tribes to ensure that their efforts for long-term stewardship of the land and water are enhanced through the design of any new structures.*

4.4 Involve environmental permitting authorities as early as possible in the design and location of new transportation projects;

*If, during the design of the project, unpermitted structures are identified, ensure that steps are taken to retroactively address the permit requirements through compliance and enforcement actions.*

4.5 Consider mitigation sequencing requirements as early as possible in the design phase to ensure that a full range of mitigation options can be considered;

4.6 Identify opportunities to improve the natural environment.

*Since every culvert, bridge and paved surface probably has some impact on the marine environment downstream, optimize every opportunity to select materials, engineering strategies and protocols to ensure successful fish passage and spawning, and to retain and enhance ecosystem functions.*

Finally, **we recommend a number of embellishments to sections of Goal #6 which address transportation services and facility designs. These elements are already noted in the 2016 Transportation goals and we propose they deserve a higher priority, more urgency and more actionable language to follow their intent.**

We suggest the following augmentations with the hope to:

- encourage public (non-private owner) access and special needs access to designated “public access” sites to shoreline and park locations,
- facilitate active transportation modes for non-motorized access to these public places,
- and assure long term stewardship of marine resources.

Goal # 6 Promote physical activity by expanding options for active transportation modes.

*Consider this as a strategy of significance for tourism, economic development and County priorities for health, equity and climate resilience.*

*For supporting information see the Island County Non Motorized Trails Plan:*

<https://www.islandcountywa.gov/DocumentCenter/View/1963/Island-County-Non-Motorized-Trails-Plan-pdf>

6.1 Promote coordination between jurisdictions in the planning and implementation of bicycle, transit, pedestrian and other alternate transportation facilities to establish continuous networks that support healthy communities.

*Consider this as a strategy of significance for tourism, economic development and County priorities for health, equity and climate resilience.*

6.2 Install paved shoulders on County arterial and collector roadways where feasible

*No comment*

6.3 New projects in NMUGAs will be designed and constructed considering pedestrian facilities

*No comment*

6.4 Promote connections between modes of transportation at public transit facilities

*Consider this as a strategy of significance for tourism, economic development and County priorities for health, equity and climate resilience.*

6.5 Promote a connected system of multi-use paths to encourage active transportation, recreation and physical activity.

*Consider adding: "and reduce reliance on automobile use";*

*Consider this as a strategy of significance for tourism, economic development and County priorities for health, equity and climate resilience.*

6.6 Promote public beaches for non-motorized access.

*Consider this a goal for not only "public beaches" but for "all public access sites" to the shore;*

*Consider inventorying and developing all sites designated for "public" access to the shore with signage, parking, a bench for sitting, and a dispenser for dog waste bags;*

*Consider the term "public" is inclusive of all, especially those who do not own shoreline property or otherwise have shoreline access; and*

*Consider signage throughout county shorelines that explains treaty protections of and assurance of tribal access to these shores as Usual and Accustomed harvesting and fishing locations.*

*Consider this as a strategy of significance for tourism, economic development and County priorities for health, equity and climate resilience.*

6.7 Encourage innovative and cooperative approaches among public agencies and private parties to provide recreation opportunities and public (non-shoreline owner and to accommodate those with mobility challenges) access.

*Consider making this a priority vs an option, critical for economic development, and County goals for public health, equity and climate resilience.*

6.8 Encourage linkage of parks, recreation areas and shoreline public access points with linear systems, such as hiking trails, bicycle routes and scenic drives.

*Consider making this a priority, vs an option, as a strategy of significance for tourism and economic development and County priorities for health, equity and climate resilience.*

*Consider the need for safety and aesthetic reasons for systems and trails to be DEDICATED for non-motorized uses and SEPARATED from motorized traffic of all types;*

*For supporting information see the Island County Non Motorized Trails Plan:  
<https://www.islandcountywa.gov/DocumentCenter/View/1963/Island-County-Non-Motorized-Trails-Plan-pdf>*

Thank you for your consideration.

Island County Marine Resources Committee

Jill Lipoti, Chair

Comp Plan Team: Barbara Bennett, Lead

Greg Easton PaulBen McElwain

Other Members: Kelly Webb, Vice Chair

Scott Chase Ken Collins Patrick Havel

Andi Kopit Kirk Larsen Kes Tautvydas

#### 6.1.24

To: Island County Planning Commission  
From: Island County Marine Resources Committee  
Re: Comprehensive Planning **UTILITIES ELEMENT**

These comments suggest policy considerations for the **UTILITIES** Element in the Island County Comprehensive Plan (CP) as related to the county's marine resources and characteristics.

Changing patterns in climate and sea level directly impact policy considerations re: sufficiency of fresh water resources, safety and resilience in addressing risks for flooding (fresh and marine), and management of septic drain fields. \*

Island County's finite fresh water resources (relying on source aquifers), vulnerability to sea water intrusion of wells and limited capacity to safely manage septic waste have the potential to become limiting factors for population growth. These conditions are of importance to county residents who depend upon fresh water aquifers (72% of county residents as described in the IC 2016 Comprehensive Plan\*\*), those who depend upon county utilities, and those who reside in areas becoming prone to flooding over time.

In light of the vulnerability of our Islands' finite water supply and the importance of planning for safety and resilience in flooding events, we recommend these trends be taken into consideration in updating Goals 1, 2, 5, 6, and 7 of the Utilities Element.

In addition, with these changing patterns in mind, we respectfully suggest two new goals for the Utilities Element of the Comprehensive Plan, and propose a number of recommendations under each new goal (see below). Recognizing areas of overlap between Utilities and marine resources these comments are submitted with the hope to:

- inform on-going revision and updating of the new CP re: marine resources and marine pressures
- support policies that advance County priorities for health, equity and climate considerations
- suggest strategies to make policies critical to marine considerations actionable and effective.

#### **Proposed New Goal #8:**

**Anticipate impacts on utilities related to climate change and sea level rise and develop proactive strategies and goals for safety and resilience.**

##### **Recommendation 1 re: Use of Predictive Models:**

In planning, add reliance on predictive models to anticipate dangerous ranges of extreme trends and extreme events: "Predictive models should be essential tools in the development of planning policy and regulations (e.g., Comprehensive Plan (CP), Shoreline Master Plan (SMP) and Hazard Mitigation Plan (HMP)) to ensure homes, businesses, and infrastructure (e.g., utilities and public works projects) are located and constructed in areas that will remain viable for the expected asset lifetime and not release pollutants during extreme events".\*

##### **Recommendation 2 re: Estimation and Needed Policies for Water Recharge and Flow in specific aquifers:**

"Work with state, local, and federal agencies such as NOAA and USGS, WA Ecology, and County staff to explore all data sources to estimate water flowing into and out of specific aquifers to inform decisions about State level and County specific policies that should be updated to ensure adequate groundwater supply." \* This especially points to questions re: aquifer recharge related in light of new drought and rainfall patterns and well vulnerabilities related to seawater intrusion.

##### **Recommendation 3 re: Infrastructure in Flood Prone areas:**

To prevent misunderstanding, clearly delineate the legal responsibilities of private owners from the responsibilities of government in addressing the consequences of increased flooding and erosion. \*

##### **Recommendation 4: re: Health, equity, and climate related to Flood Prone Areas:**

Track emerging flood prone areas to identify overlaps between expanding flood-prone areas with wetlands of importance for salmon recovery and sites important for treaty compliance suggesting some economies of scale for protective measures. \*



**Proposed new goal #9: Re: Encourage establishment of community wastewater treatment facilities where feasible in lieu of individual septic systems.**

**#9A: Re: Septic drain fields in flood prone and shoreline areas – Health and Equity Recommendation:**

Septic drain fields in flood prone areas present unique threats to human and ecosystem welfare overall and specifically to emergency responders in extreme events. \*

**Recommendation 1:** Every effort should be made to incentivize removal of existing drain fields (whether functioning or failed) in all flood prone areas and throughout the SMP domain and waterward.

**Recommendation 2:** Every effort should be made to avoid replacement or placement of new septic systems within projected flood areas. Develop additional requirements for new and retrofit septic systems within projected flood areas. Requiring watertight septic tank lids could reduce exposure to the community and first responders during response to flood events. \*

**Recommendation 3 re: Alternatives to septic drain fields in flood prone areas:** Technology: Technological advances in small, independent individual or community septic systems may present new options to address this hazard but the cost to decommission and remove a drain field and install a new system is significant. \*

**Recommendation 4 re: Strategic use of enforcement:** The County, under exceptional circumstances and following identification and notification of a violation, might apply enforcement with the goal to heighten public awareness, understanding and compliance with regulations.

**#9B Re: Septic considerations for Higher density development in designated non-municipal urban growth areas and Rural Areas of more Intense development**

Higher density development in designated non-municipal urban growth areas and Rural Areas of more Intense development will require community water treatment facilities to achieve desired densities. Such systems support allocated population and housing growth as well as employment-based economic development.

**Recommendation 1:** Plan for and require technically and economically feasible community systems in designated areas.

**Recommendation 2:** Provide incentives for community systems through regulatory bonuses or flexibility, or financial contributions.

**Recommendation 3:** Provide technical assistance in organizing public or private utility entities to develop and operate systems.

Thank you for your consideration.

Respectfully submitted,

Island County Marine Resources Committee

Jill Lipoti, Chair

Comp Plan Team:

Barbara Bennett   Greg Easton   PaulBen McElwain

Other Members:

Scott Chase   Ken Collins   Patrick Havel   Andi Kopit   Kirk Larsen   Kes Tautvydas

Kelly Webb, Vice Chair

\*Quoted from the MRC White Paper: *Emerging Hazards, Challenges and Opportunities Facing Island County related to Climate Change* submitted to the BOCC on 12.20.23.

\*\* Referenced from *Island County 2016 Comprehensive Plan, Utilities Element, Water Supply Overview, 9.4.1.1*

## *PROPOSAL TO CREATE A NEW COMPREHENSIVE PLAN **MARINE CHARACTER ELEMENT***

We, the members of the Island County Marine Resources Committee, encourage creation of a new Element within the introduction, vision and body of the Island County Comprehensive Plan to be called **Marine Character** and to be used to voice the county's long- range vision, fundamental values and mid-range (directional) goals for the shorelines of the county.

This content will provide a missing policy context for the code addressed in the Shoreline Management Program of the Comprehensive Plan.

We recommend the **Marine Character Element**;

- be modeled after the existing element of *Rural Character*;
- articulate compliance with Federal and State laws which drive the Shoreline Management Program code section and support of Puget Sound's restoration;
- point to the value of marine open spaces, scenic vistas, shorelines, intertidal lands, wetlands, watersheds and bluffs, as assets that contribute to the county's economic development, natural resource uses, and recreational opportunities;
- describe the County's current and emerging vision, core values and long-range goals related to marine resources to guide long-range planning and shape policies toward mid-range goals;
- affirm the importance of marine resources in future strategies for human safety and resilience as the climate continues to change;
- voice desire to align local policy with Public Trust themes of shoreline stewardship and public access;
- recognize the finite nature of our islands' water resources and capacity to manage septic systems
- recognize the impact of land-based modifications upon critical marine habitats and species.

### **Why create a new *Marine Character Element*?**

- The current Comprehensive Plan (2016) does not articulate a vision, values or goals for marine code;
- The **Marine Character Element** will create a policy context for current marine-related policy and encourage dialogue re: long-range vision for future marine-related policies;
- Creation of a **Marine Character Element** will appropriately address that Island County is made up of two islands, surrounded by the marine waters of Puget Sound within the Salish Sea.

### **What are next steps:**

We ask the Planning Commission and Planning Department to:

- create a separate ***Marine Character Element*** for the Comprehensive Plan being developed currently
- or insert concepts from this ***Marine Character Element*** proposal into the iteration of the Comprehensive Plan Vision, Introduction and the Natural Resource Element being developed currently
- and accept the proposal to create a ***Marine Character Element*** for the next iteration (not the iteration currently being reviewed) of the Island County Shoreline Management Program and the next iteration (not the iteration currently being developed) of the Island County Comprehensive Plan.

Thank you for your consideration.

Respectfully,

The members of the Island County Marine Resources Committee

**Themes common across considerations re: Climate Change**

- A. Historic records and trends do not consider current and changing conditions. (Planning based only on past records is analogous to driving only looking in the rear view mirror.)  
**Therefore: predictive models must be taken into consideration**
- B. Extreme events are the most damaging, most difficult to anticipate and reflect the compounding interplay between multiple well established factors in combination with new, emerging factors: ('22: SLR+ ext. rainfall+ low bar. pressure = extreme flooding)  
**Therefore: Precautionary policies must allow for extremes for resilience.**
- C. Federal Laws entrust state and local entities with sustaining shoreline ecological functions (DOE goals for No Net Loss and Net Ecological Gain), assuring public access and respect Federal Treaty obligations. **Therefore: County policy must, for legal reasons based upon Federal, Treaty and State responsibilities, balance growth management and private property rights with requirements for ecological viability, public access and treaty obligations.**
- D. **(In light of this, we also recommend exploring creation of a county policy to disqualify unpermitted structures for funding from govt sources.)**
- E. Island County is made up solely of Islands which have finite natural resources i.e. available drinking water and capacity to treat septic waste. As climate changes these capacities may also change.**Therefore: An adaptive, cautious policy approach will keep uses of natural resources in pace with dynamic natural resource capacities.**
- F. Given the dynamic nature of climate changes, county policies must incorporate Departmental coordination and collaboration to allow them to respond coherently.  
**Therefore: A tool to CROSSWALK county policies that impact related Climate issues is needed particularly between the Comprehensive Plan, Shoreline Management Act, and Hazard Mitigation Plan**
- G. A mix of public, private and corporate infrastructures serve the many communities of the county. In an emergency, this tangle can interfere with an effective response  
**Therefore: Clarification of governmental roles vs. the roles of private landowners and neighborhood organizations is essential for emergency preparedness.**
- H. Adaptive strategies to respond to dynamic flooding patterns and protective of natural resources are preferred over further development of and encroachment upon flood prone areas.
- I. A paradigm shift is advised to defer to pressures of climate change and leverage the county's natural resources as assets for shoreline protection, places of access to the shore and, as conditions allow, for recreation.

1. Sea Level Rise is not an isolated issue. It reflects overall climate changes, becomes a compounding factor when extreme storms bring extreme winds, and/ or inland stormwater flooding when extreme storms bring extreme rains.
2. All facets of Island County management are already, and will increasingly be, impacted by climate changes: at risk are roads and capital projects, public utilities, parks and historic structures in addition to privately owned structures and utilities. **CROSSWALK**
3. Climate changes threaten the traditional framework of economic development which depends upon taxes from private residential development. We suggest a paradigm shift that leans into this county as a haven for all to have access to the shore and flood prone areas, as a green space that enhances the quality of life for the entire urban range of the Seattle area.
4. Regarding private homes in flood prone areas, in the **short term** we recommend an adaptive policy approach to changing conditions on a continuum from elevating a structure, increasing the set back from the encroaching mean high tide, to actually relocating the structure inland and upland for long term resilience.
5. In the **long term**, we recommend moving any structures away from flood prone areas, and suggest the county consider policy strategies to address buildings no longer in use and/ or no longer able to be used in flood prone areas.
6. **We also recommend exploring creation of a county policy to disqualify unpermitted structures for funding from govt sources**.
7. The question of building or enhancing hard armoring as a strategy to extend the life of a structure begs the question of county responsibilities and policy intent in relation to marine ecosystem protections and the prerogatives of private ownership and is currently being researched and discussed.
8. We also recommend strategic and selective use of enforcement to reinforce policy compliance
9. Reference programs focused on these issues and solutions to them: the Shore Friendly program being implemented in Island County, the San Juan County Real Estate Excise Tax and the King County Vashon/Maury Island Watershed Steward Program.

**Resources:**

- <https://enviroatlas.epa.gov/enviroatlas/interactivemap/>
- <https://www.deq.nc.gov/climate/2020-climate-risk-assessment-resilience-plan/open>
- <https://www.islandcountywa.gov/365/Shore-Friendly-Program>
- <https://kingcounty.gov/en/legacy/services/environment/watersheds/central-puget-sound/vashon-maury-island>
- <https://www.sanjuancountywa.gov/316/Real-Estate-Excise-Tax>

## **Climate Change Impacts on Groundwater Recharge**

### **Talking Points. 10/28/24**

Island County depends upon wells for drinking water for Camano, South Whidbey and much of North Whidbey. Rainfall filters through the soil to replenish underground reservoirs, called aquifers from which drinking water is drawn. If more water is drawn from the aquifer than can be recharged, the aquifer risks depletion.

### **Issues and Impacts**

1. Increases in demand for water due to hotter weather and dryer conditions result in additional extraction from the aquifer and increased risk of depletion. Heat and ground water impacts are clearly related.
2. While the average rainfall over the course of a year may not vary, if rainfall is not received in a gradual manner but instead in a series of deluges, the rain does not permeate to the aquifer and runs off instead of recharging.
3. As sea level rises the risk of saltwater intrusion into wells in shoreline areas increases and the capacity of the freshwater aquifer is reduced. Sea Level Rise and groundwater impacts are clearly related.
4. As development takes place in Island County, impervious surface area increases in opposition to an increased demand for drinking water, irrigation and other uses. Development pressures increase as additional extreme weather events encourage residents of other areas of the country to relocate in western Washington.
5. Groundwater and Surface Water (streams) are linked. During the summer, when there is less rain, not only does the replenishment of groundwater diminish, there is less water to keep streams flowing. All of the marine biota depend on eel grass and kelp. A constant source of freshwater, a constant source of sediment is best for these. Extremes, whether water or sediment loads, are not good for biota.

These generalized concepts must be interpreted for specific locations over specific aquifers within Island County and take into consideration the extent of impervious surface as well as the projected demand.

### **Recommended Actions**

1. Gather available data on the water balance (use versus replenishment) within aquifers to ensure adequate aquifer capacity for projected water usage.
2. Continue and improve policies and programs that encourage more efficient usage of extracted water.
3. Continue to improve policies and programs that increase the recharge of our aquifers and reduce the amount of stormwater running into the Salish Sea. Such actions include reducing impervious surfaces from new development, expanded wastewater treatment and more effective septic systems, and Improved capture and infiltration systems.

4. Encourage the organization of community water and wastewater systems. Such systems allow for more efficient use of resources and coordinated response to expected events.



## Island County Comprehensive Plan

### Climate Change -Heat Focus Group

November 1, 2024

#### Coupeville Recreation Hall

On behalf of the Marine Resources Committee.

1. Focus on extreme events – average temperatures may be increasing, but it is the extremes that will be most damaging to human, marine, animal and plant life. Heat exposure is the leading cause of weather-related deaths in the country. Consider what metrics are relevant to measure the impact of heat and begin to collect data. Are they the number of days above 90 degrees? Or the number of consecutive low tides at elevated temperatures?
2. Do not rely on the past to predict the future – basing decisions on past averages ignores the increasingly frequent extremes. Use predictive models in the development of planning policy.
3. Consider the interrelationships – extreme heat coupled with dry conditions – more water is extracted from the ground during hot conditions. Aquifers are not recharged when it is dry, leading to water shortages and saltwater intrusion in wells. Consider the metrics that are relevant to show the additive impact of interrelated extreme conditions.
4. Direct marine life impacts – Extreme heat waves affect shellfish and other intertidal life directly, causing massive die-offs which then cause a nutrient load on Puget Sound. Summer heat waves can coincide with low tides during daylight hours, exposing marine life to direct heating without the buffering capacity of cooler waters. Recreational shellfish harvesting can be affected, but so can the ecological systems that operate in the waters around Island County. Forage fish are essential to the foundation of the Puget Sound food web. There are specific conditions for the survival of each species of forage fish (sand lance, surf smelt, and herring). Conditions include temperature, sand grain size, tidal fluctuation and intertidal vegetation. The temperature range for the various forage fish are constrained by an upper bound so these fish are particularly susceptible to heat. The MRC has monitored for forage fish (sand lance and surf smelt) since 2016 and has 4 restoration sites (Hoypus Point, Cornet Bay, Keystone Farm, and Seahorse Siesta) and 2 index sites (Glendale and Maple Grove). Samples are collected by volunteers and sent to the Department of Fish and Wildlife for analysis. Results are compiled in annual reports, and on the WDFW website. WDFW protects sand lance and surf smelt spawning locations under the terms of a Hydraulic Project Approval permit. The presence of forage fish is important for decision-making for shoreline projects.
5. Marine heat waves also enhance the probability and extent of diseases that affect eelgrass, kelp, shellfish, etc. As sea level rise pushes eelgrass upslope, eelgrass (and all other biota associated with it) can be affected.
6. Increasing temperatures can impact threatened/ endangered species and can provide habitat for invasive species to thrive. Monitor the changes to the ecological systems and take action when imbalances occur.
7. Heat is an energy feed to the meteorological events in Puget Sound, and one of the most impactful events to Island County is wind. We have an inordinate number of wind events every year, and it is common for wind to blow trees down and cause power outages. Heat just makes things worse. And a wind event combined with a heat event can make things even more

miserable since generators frequently do not provide power for air conditioning. When considering risk to IC, wind should be one of the factors which is added into the model.

8. Wind is an important driver of sediment movement. Sediment in Puget Sound moves in drift cells. Sediment can create and destroy habitat for biota in the marine environment. Consider the interconnectivity of abiotic and biotic systems. Track extreme wind events and the impact to marine life.
9. When considering equity initiatives such as affordable housing, transit, and other capital facilities, plan for cooling centers for people without air conditioning and provide air-conditioned transit options. From the Skagit County Comprehensive plan (released 10/22/2024) Consider creating “Resilience hubs” for heat related and other extreme events — a concept developed by the Urban Sustainability Directors Network — are well-trusted, well-utilized community facilities that serve the needs of the community more broadly than temporary emergency shelters. Designed and managed by the community (e.g., a local non-profit or house of worship), resilience hubs can enhance social cohesion by providing residents a place to gather and access information and services at all times. During wildfire smoke events, for example, such hubs could provide cool, filtered air and respiratory masks in neighborhoods with greater socioeconomic risk and prevalence of asthma and other respiratory conditions. Such hubs could also provide residents a place to receive basic medical care, charge electronic devices, and access the internet. To maintain power during outages and to provide steady-state services, such hubs could be outfitted with a solar and back-up battery storage system (energy system) that can serve as an island from the conventional grid.
10. Integrate with the Hazard Mitigation Plan and have written plans for extreme temperature events. Consider creating a Chief Heat Officer position as Miami has. (Smithsonian, Sept/Oct 2024, pp.109-119).
11. Under the category of nature based solutions, trees can be effective measures to mitigate extreme heat. Integrate plans for tree planting in urban areas to address the “heat island effect”. Trees provide shade, lower the ground surface temperature, and offset carbon emissions. Trees are especially important in riparian zones as buffers around streams. Biota in streams are susceptible to heat extremes, and shade can help to mitigate the impact.
12. Consider the cooling effect of trees whenever a permit comes into the county for tree cutting. Ensure that a heat island is not being created by cutting down trees. Shade from trees is also important for habitat for plant and animal life, as well as marine life. Implementing a tree policy requires coordination on landscape-level management across jurisdictions and with private landowners. Local land use codes should increase scrutiny and review over tree removal in certain areas by prioritizing retention of healthy trees and tree canopy. Requirements should focus on balancing the tradeoffs between the retention of existing healthy trees, the planting of new trees in locations that better support tree health and maintain or increase tree canopy, and the efficient and strategic use of limited developable land. Use an equity framework to prioritize low-canopy and low-income neighborhoods. Also, ensure the forest master plan facilitates ecologically appropriate management across different ownership types and jurisdictional boundaries.
13. When siting solar panels, consider their ability to provide shade for things like parking lots. Prioritize solar development that can serve the additional purpose of shading cars and people.

Consider solar panels on all transit stops – for shade as well as to provide electricity for lighting. While the buses may be airconditioned, waiting for the bus could be uncomfortably hot.

14. Change the building code to require heat reflective roofs.
15. Facilitate permitting for green roofs.
16. For county employees who work outside during the summer, consider adjusting working hours so they can start work earlier in the day when temperatures are cooler.
17. Work with health care professionals to consider how some common medications can make people more vulnerable to heat. Provide educational information to people who have chronic illnesses such as schizophrenia, diabetes, and cardiovascular or respiratory disease so they understand that they are more vulnerable to overheating and that the medications they need may worsen these risks. (Article by Charlotte Hu, May 1, 2024.)