



SAN JUAN COUNTY  
DEPARTMENT OF COMMUNITY DEVELOPMENT

135 Rhone Street, PO Box 947, Friday Harbor, WA 98250  
(360) 378-2354 | (360) 378-2116 | FAX (360) 378-3922  
cdp@sanjuanco.com | www.sanjuanco.com

**MEMO**

**REPORT DATE:** June 16, 2021

**TO:** San Juan County Planning Commission

**FROM:** Sophia Cassam, Planner I

**SUBJECT:** 2021 Annual Docket  
Public Comments on Requests 21-0003 and 21-0005

**BRIEFINGS:** Planning Commission: June 18, 2021

**ATTACHMENTS:** A. Public Comments on Docket Request 21-0003 (Build-Out Analysis)  
B. Public Comments on Docket Request 21-0005 (Tree Code)  
C. Public Comment on Multiple Docket Requests

---

**PURPOSE:** Transmittal of public comments on the 2021 Docket received between June 13-16, 2021.

**Sophia Cassam**

---

**From:** Lynda Guernsey  
**Sent:** Tuesday, June 15, 2021 8:09 AM  
**To:** Sophia Cassam  
**Subject:** FW: I support Docket 21-0003

Hi Sophia,

Please see the email below in regard to the Docket.

Regards,  
Lynda

Lynda Guernsey, Administrative Specialist II – Direct Line (360) 370-7579  
**SAN JUAN COUNTY**  
DEPARTMENT OF COMMUNITY DEVELOPMENT  
(360) 378-2354 | 135 Rhone Street | PO Box 947 | Friday Harbor, WA 98250

---

**From:** joAn Mann <jo.an.a.mann@gmail.com>  
**Sent:** Sunday, June 13, 2021 9:42 PM  
**To:** Lynda Guernsey <LyndaG@sanjuanco.com>  
**Subject:** I support Docket 21-0003

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Lynda,

In my work with Eastsound Planning and Review there were several projections floating about the potential number of residents estimated for Orcas and the San Juan Islands in general. They were alarmingly high for what our infrastructure and environment can sustain. Water being a critical item for Orcas, where many of the lots have poor quality wells even today... and that is just the tip of the iceberg.

If there isn't a county wide conversation, we aren't being true to any of the Vision and mission work from the June 2018 Plan... and certainly not to protecting the SJ Islands as a "rural designation."

Inclusion, equity, access (and diversity...) are the bywords politically and in Human Resources these days. Being an HR Professional for over 40 years, this just gets stronger with each generation. Keeping this on the docket is a crucial first step to keeping things civil and conversational. Thanks so much for your help and considerations for this docket item consideration!

with my gratitude and best,  
*joAn Mann*  
*Orcas Island Resident*  
*PO Box 162, 178 Judith Lane*  
*Orcas 98280*

## Sophia Cassam

---

**From:** Lynda Guernsey  
**Sent:** Tuesday, June 15, 2021 10:06 AM  
**To:** Sophia Cassam  
**Subject:** FW: I support Docket 21-0003

Hi Sophia,

Please see the email below in regard to the Docket.

Regards,  
Lynda

Lynda Guernsey, Administrative Specialist II – Direct Line (360) 370-7579 SAN JUAN COUNTY DEPARTMENT OF COMMUNITY DEVELOPMENT  
(360) 378-2354 | 135 Rhone Street | PO Box 947 | Friday Harbor, WA 98250

-----Original Message-----

**From:** Susan Grout <grout@rockisland.com>  
**Sent:** Monday, June 14, 2021 11:52 AM  
**To:** Lynda Guernsey <LyndaG@sanjuanco.com>  
**Subject:** I support Docket 21-0003

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

We need a build out analysis. Our islands are going the way of Cape Cod. Don't let it happen to these fragile beautiful islands where scenery is plentiful and water and housing scarce.

Susan Grout

Sent from my iPhone

## Sophia Cassam

---

**From:** Lynda Guernsey  
**Sent:** Tuesday, June 15, 2021 10:58 AM  
**To:** Sophia Cassam  
**Subject:** FW: I support Docket 21-0003

Hi Sophia,

Please see the email below in regard to the Docket.

Regards,  
Lynda

Lynda Guernsey, Administrative Specialist II – Direct Line (360) 370-7579  
**SAN JUAN COUNTY**  
DEPARTMENT OF COMMUNITY DEVELOPMENT  
(360) 378-2354 | 135 Rhone Street | PO Box 947 | Friday Harbor, WA 98250

---

**From:** David Turnoy <davidgeri@rockisland.com>  
**Sent:** Monday, June 14, 2021 10:08 PM  
**To:** Lynda Guernsey <LyndaG@sanjuanco.com>  
**Subject:** I support Docket 21-0003

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi,

I am not sure if I have weighed in on this recently, but I support Docket Request 21-0003; this request asks that the county determine the maximum population of the county and demonstrate how that population is consistent with the Vision Statement. As a collection of islands, we have limited capacity for growth. Without knowing what our maximum population is that can be supported by available water and other constraints, we are shooting in the dark when it comes to growth. Good government would require that this study be completed.

Thank you,  
David Turnoy  
Orcas Island

## Sophia Cassam

---

**From:** Lynda Guernsey  
**Sent:** Tuesday, June 15, 2021 11:11 AM  
**To:** Sophia Cassam  
**Subject:** FW: Docket Request 21-0003

Hi Sophia,

Please see the email below in regard to the Docket.

Regards,  
Lynda

Lynda Guernsey, Administrative Specialist II – Direct Line (360) 370-7579  
**SAN JUAN COUNTY**  
DEPARTMENT OF COMMUNITY DEVELOPMENT  
(360) 378-2354 | 135 Rhone Street | PO Box 947 | Friday Harbor, WA 98250

---

**From:** Alice B. Acheson <aliceba7@gmail.com>  
**Sent:** Tuesday, June 15, 2021 9:15 AM  
**To:** Lynda Guernsey <LyndaG@sanjuanco.com>  
**Subject:** Docket Request 21-0003

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning!

I am very concerned for the future population of San Juan County.

The legal buildout population for San Juan County is over 134,000 people -- without accounting for even one of the thousands of visitors who have found our County.

That number seems "crazy" to me. Not sure what the current population is for San Juan County, but I'm sure it is lower than 10% of the legal buildout population -- without including even one tourist.

I can't imagine what life here would be with 121,000 more people! **The small supply of water alone would cause dissension -- and most likely civil unrest.**

Already wells are going dry, and this past week's weather is proof that we can't depend on rain.

It was forecast that this past weekend we would have a super soaker storm. At best we received 1/4".

PLEASE ask the Planning Commissioners to rethink a new legal buildout population for the County. The current one is not realistic.

Sincerely,  
Alice B. Acheson  
=====

Alice B. Acheson, Book Marketing/Publishing Consultant  
P. O. Box 735  
Friday Harbor, WA 98250  
360/378-5850  
<https://sites.google.com/view/alice-b-acheson>

---



Virus-free. [www.avg.com](http://www.avg.com)

## Sophia Cassam

---

**From:** Lynda Guernsey  
**Sent:** Tuesday, June 15, 2021 11:24 AM  
**To:** Sophia Cassam  
**Subject:** FW: I support Docket 21-0003

Hi Sophia,

Please see the email below in regard to the Docket.

Regards,  
Lynda

Lynda Guernsey, Administrative Specialist II – Direct Line (360) 370-7579  
**SAN JUAN COUNTY**  
DEPARTMENT OF COMMUNITY DEVELOPMENT  
(360) 378-2354 | 135 Rhone Street | PO Box 947 | Friday Harbor, WA 98250

---

**From:** brooke budner <bbudner@gmail.com>  
**Sent:** Tuesday, June 15, 2021 10:57 AM  
**To:** Lynda Guernsey <LyndaG@sanjuanco.com>  
**Subject:** I support Docket 21-0003

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

hello,  
my name is brooke budner and ive been a resident of san juan county for 15 years. i am writing to express my strong support for docket 21-0003. i believe it is of critical importance that the county have a cap on population growth. not only would be be pushing the limits of our natural resources, but the county and community would lose much of its character and soul if population growth is allowed to go unchecked.  
thank you for considering my opinion,  
brooke budner

--

<http://www.landseagomasio.com>

## Sophia Cassam

---

**From:** Lynda Guernsey  
**Sent:** Tuesday, June 15, 2021 11:07 AM  
**To:** Sophia Cassam  
**Subject:** FW: I support Docket 21-0003

Hi,

Please see the email below in regard to the Docket.

Regards,  
Lynda

Lynda Guernsey, Administrative Specialist II – Direct Line (360) 370-7579 SAN JUAN COUNTY DEPARTMENT OF COMMUNITY DEVELOPMENT  
(360) 378-2354 | 135 Rhone Street | PO Box 947 | Friday Harbor, WA 98250

-----Original Message-----

**From:** David Densmore <daviddensmore@rockisland.com>  
**Sent:** Tuesday, June 15, 2021 8:40 AM  
**To:** Lynda Guernsey <LyndaG@sanjuanco.com>  
**Subject:** I support Docket 21-0003

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

It seems that the planners should take build-out into consideration. Are there remedies we could entertain?

A survey of “unbuildable” lots - how many are there? I own a parcel that can never be built on.

How about folks who have bought parcels next to them to lower congestion? Can tax breaks be offered to encourage lots put in an unbuildable status?

Please take time to discuss what steps can be taken to facilitate acts that gradually lessen the potential build out.

Thank you,  
David Densmore  
PO Box 53, Orcas, WA 98280

## Sophia Cassam

---

**From:** Lynda Guernsey  
**Sent:** Wednesday, June 16, 2021 8:13 AM  
**To:** Sophia Cassam  
**Subject:** FW: Docket 21-0003  
**Attachments:** Lynda.docx

Hi Sophia,

Please see the email below and attachment in regard to the Docket.

Regards,  
Lynda

Lynda Guernsey, Administrative Specialist II – Direct Line (360) 370-7579 SAN JUAN COUNTY DEPARTMENT OF COMMUNITY DEVELOPMENT  
(360) 378-2354 | 135 Rhone Street | PO Box 947 | Friday Harbor, WA 98250

-----Original Message-----

**From:** John Evans <johnevans@orcasonline.com>  
**Sent:** Tuesday, June 15, 2021 8:27 PM  
**To:** Lynda Guernsey <LyndaG@sanjuanco.com>  
**Subject:** Docket 21-0003

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Lynda,  
The attached is for the Planning Commission for Docket 21-0003.  
Hope to see you at the parade this year.  
John

June 14, 2021

To: Lynda Guernsey, Planning Commission and others as appropriate.  
RE: Discussion on growth.

Dear Commissioners:

The discussion on population needs to consider:

Land Bank and Preservation Trust parcels that will not be developed.

Roughly 10% of parcels are un-developable.

Property owners who acquire parcels to preserve their privacy need to be considered.

Roughly half the population goes south in the winter,

Planning under GMA: there is no population cap allowed under GMA. Under federal and State law, people are allowed to live where they want. Under GMA, we are required to accommodate new growth.

Internet telecommuting is a double-edge sword that makes working from home a possibility. Additional affordable housing also exacerbates population.

There are some natural constraints:

1. Transportation of people, goods and services to and from the islands is expensive.
2. Housing and building is very expensive.
3. Jobs and our Island economy are restricted.
4. Medical services may be inconvenient.
5. In terms of shopping and entertainment, island life is bare bones.
6. Air travel is and should be limited by airport size.

Thank you for your attention. Each listed item could occupy a full days discussion. San Juan County will continue to grow slowly depending on the world around us.

Respectfully,

John Evans  
PO Box 116  
Olga, WA 98279

360-376-4961  
johnevs@orcasonline.com

## Sophia Cassam

---

**From:** Lynda Guernsey  
**Sent:** Tuesday, June 15, 2021 11:09 AM  
**To:** Sophia Cassam  
**Subject:** FW: I support Docket 21-0003

Hi Sophia,

Please see the email below in regard to the Docket.

Regards,  
Lynda

Lynda Guernsey, Administrative Specialist II – Direct Line (360) 370-7579 SAN JUAN COUNTY DEPARTMENT OF COMMUNITY DEVELOPMENT  
(360) 378-2354 | 135 Rhone Street | PO Box 947 | Friday Harbor, WA 98250

-----Original Message-----

**From:** Gregory Kramer <gregory@metta.org>  
**Sent:** Tuesday, June 15, 2021 8:47 AM  
**To:** Lynda Guernsey <LyndaG@sanjuanco.com>  
**Subject:** I support Docket 21-0003

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear County Friend,

As the San Juan County Planning Commission works on Docket Request 21-0003, I am asking that the county determine the maximum population of the county and demonstrate how that population is consistent with the Vision Statement.

Our region is largely impacted by vacation rentals and second homes. People with little stake in the community stand to overwhelm local concerns, and the natural environment may be damaged if development is not carefully controlled. Intelligent and responsible consideration of these issues is not possible without a public legal buildout number and that number being wisely set.

Thank you for your careful personal and institutional consideration.

Dr. Gregory Kramer, full time resident of Orcas Island

## Sophia Cassam

---

**From:** Lynda Guernsey  
**Sent:** Tuesday, June 15, 2021 11:38 AM  
**To:** Sophia Cassam  
**Subject:** FW: I support Docket 21-0003

Hi Sophia,

Please see the email below in regard to the Docket.

Regards,  
Lynda

Lynda Guernsey, Administrative Specialist II – Direct Line (360) 370-7579 SAN JUAN COUNTY DEPARTMENT OF COMMUNITY DEVELOPMENT  
(360) 378-2354 | 135 Rhone Street | PO Box 947 | Friday Harbor, WA 98250

-----Original Message-----

**From:** Gregory Oaksen <gregoaksen@gmail.com>  
**Sent:** Tuesday, June 15, 2021 11:26 AM  
**To:** Lynda Guernsey <LyndaG@sanjuanco.com>  
**Subject:** I support Docket 21-0003

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I support Docket Request 21-0003. We need to be clear about the implications of the Comprehensive Plan for San Juan County!

Gregory Oaksen  
Eastsound

Sent from my iPhone

## Sophia Cassam

---

**From:** Lynda Guernsey  
**Sent:** Tuesday, June 15, 2021 12:51 PM  
**To:** Sophia Cassam  
**Subject:** FW: Docket request 21-0003

Hi Sophia,

Please see the email below in regard to the Docket.

Regards,  
Lynda

Lynda Guernsey, Administrative Specialist II – Direct Line (360) 370-7579  
**SAN JUAN COUNTY**  
DEPARTMENT OF COMMUNITY DEVELOPMENT  
(360) 378-2354 | 135 Rhone Street | PO Box 947 | Friday Harbor, WA 98250

---

**From:** Anji Ringzin <anji@mindplace.com>  
**Sent:** Tuesday, June 15, 2021 12:28 PM  
**To:** Lynda Guernsey <LyndaG@sanjuanco.com>  
**Subject:** Docket request 21-0003

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

From: Anji Ringzin, Eastsound, WA  
To: SJC Planning Commission Date: 14 June 2021  
Re: Docket request 21-0003

I write to you as a longtime resident (20 years on Orcas) requesting that you support the docket request 21-0003. The docket request asks for an analysis to show the impact of what this population maximum would have on the county. The impact of visitors should also be included.

The docket request asks the county to determine the population capacity and comment on how this potential meets the county's GMA Vision Statement.

Residents need to be informed of growth trajectories and their implications for carrying capacity, community values, tax burdens, and sustainability. Most residents moved here for a quiet life, and we loathe seeing our island home become even more overcrowded.

Sincerely,  
Anji Ringzin  
1364 Palisades Drive,  
Eastsound,  
WA, 98245

## Sophia Cassam

---

**From:** Lynda Guernsey  
**Sent:** Tuesday, June 15, 2021 11:13 AM  
**To:** Sophia Cassam  
**Subject:** FW: I support Docket 21-0003

Hi Sophia,

Please see the email below in regard to the Docket.

Regards,  
Lynda

Lynda Guernsey, Administrative Specialist II – Direct Line (360) 370-7579 SAN JUAN COUNTY DEPARTMENT OF COMMUNITY DEVELOPMENT  
(360) 378-2354 | 135 Rhone Street | PO Box 947 | Friday Harbor, WA 98250

-----Original Message-----

From: Barry D Rose <bdrose51@gmail.com>  
Sent: Tuesday, June 15, 2021 9:26 AM  
To: Lynda Guernsey <LyndaG@sanjuanco.com>  
Subject: I support Docket 21-0003

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Greetings!

I am writing to support the Truth in Planning provision now being considered.

We cannot accommodate anywhere near a population of 134,000 people in San Juan County.

Please support responsible growth management!

Thank you,

Barry D. Rose  
Orcas Island

Sent from my iPhone

## Sophia Cassam

---

**From:** Lynda Guernsey  
**Sent:** Wednesday, June 16, 2021 1:03 PM  
**To:** Sophia Cassam  
**Subject:** FW: Docket Request 21-0003 support

Hi Sophia,

Please see the email below in regard to the Docket.

Regards,  
Lynda

Lynda Guernsey, Administrative Specialist II – Direct Line (360) 370-7579  
**SAN JUAN COUNTY**  
DEPARTMENT OF COMMUNITY DEVELOPMENT  
(360) 378-2354 | 135 Rhone Street | PO Box 947 | Friday Harbor, WA 98250

---

**From:** suzanne heyd <sheyd@snet.net>  
**Sent:** Wednesday, June 16, 2021 1:00 PM  
**To:** Lynda Guernsey <LyndaG@sanjuanco.com>  
**Subject:** Docket Request 21-0003 support

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Lynda,

As Orcas Island homeowners, local farmers, and concerned/engaged citizens of this rural community, we are writing to support **Docket Request 21-0003 in the strongest possible terms. It is critical that the county accurately and deliberately determines the maximum population of the county and demonstrates how that population is consistent with the county Vision Statement.** Such an analysis must include a clear-eyed, honest, and complete accounting of the reasonable limitations of all resources that make the island habitable to any of us, including non-human life (wildlife, plants, trees, shoreline habitats). **Also critical is the preservation and honoring of treaty rights and lifeways of the Indigenous tribes that call our islands home.** It is almost impossible to imagine that 'full buildout capacity' as it currently stands would be anything less than apocalyptic to all life on this island. If this is in fact not true, and the island is capable to increasing its year round population by tenfold, it is incumbent on the Planning Commission to prove to the rest of us that this is absolutely true.

No reliable, respectful, or respectable planning can be done at this point until such a buildout analysis is completed, and reported back to all community stakeholders. Not undertaking this process--weighty and challenging as it may be--and continuing to issue permits without limit, is a dereliction of your duty and will have consequences to future generations far beyond us all here on this Island now.

Sincerely and with thanks for your efforts,  
Norris Carlson

**Sophia Cassam**

---

**From:** Lynda Guernsey  
**Sent:** Tuesday, June 15, 2021 10:22 AM  
**To:** Sophia Cassam  
**Subject:** FW: Please forward letter to all Planning Commissioners  
**Attachments:** Planning Commssioners June 14 2021.docx

Hi Sophia,

Please see the email below and attachment in regard to the Docket.

Regards,  
Lynda

Lynda Guernsey, Administrative Specialist II – Direct Line (360) 370-7579 SAN JUAN COUNTY DEPARTMENT OF COMMUNITY DEVELOPMENT  
(360) 378-2354 | 135 Rhone Street | PO Box 947 | Friday Harbor, WA 98250

-----Original Message-----

From: anne whirledge karp <anneawish@me.com>  
Sent: Monday, June 14, 2021 1:16 PM  
To: Lynda Guernsey <LyndaG@sanjuanco.com>  
Subject: Please forward letter to all Planning Commissioners

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Lynda,

Please forward my attached letter to all of the Planning Commissioners as soon as possible as it concerns issues being discussed in the upcoming Comp Plan Meeting on Friday, June 18, 201 .

Thank you,

Anne Whirledge-Karp

June 14, 2021

Greetings Planning Commissioners,

I am writing to you today to express my opinions concerning some pressing issues that are being addressed at the SJC Comprehensive Plan Meeting, on Friday, June 18, 2021.

I would like to encourage you to be very cautious concerning any de-designation requests of Agricultural Resource Land and Forest Resource Lands. I know that the Planning Department Staff has made recommendations concerning requested changes but that your final decisions are very important. WA State Commissioner of Lands, Hilary Franz, is currently making efforts to ensure that a million acres of Ag and Forest Resource Lands are NOT de-designated, realizing the value of these acres for carbon sequestration, water quality & quantity, land stability, habitat for fish and wildlife, and air quality. WA state's Healthy Forest Plan applies for both large and small forest owners and 'best practices' laid out will help protect both public and private lands from wildfires, drought, and improve air quality for all. Please continue to support these efforts by NOT de-designating land out of Agricultural and Forest Resource Land in SJC.

In addition, please support the Docket Request 21-0005, Tree Retention and Protection. With the increased danger of fire and drought within the state, I firmly believe science is indicating that increasing efforts toward protection and health are needed more than previously addressed. These concerns should be for all forest owners, large and small and NOT just in "critical areas". Again, according to WA State Public Lands Administration, the risks and need for forest protection has greatly increased in Western WA. Looking around within the islands and Salish Sea Bioregion the effects of poor forest health can be seen through increasing diseased and dying trees. Practices that will restore these forests both large & small, private & public back to health will benefit all living beings in the region as well as provide more resilience to Climate Change. The solution is keeping these forests intact and healthy.

Finally, I hope you will support the need for more clarity to the public concerning the need for a 'Build Out Analysis' and a better understanding of the interconnectedness of the 'Carrying Capacity' within the San Juan Islands. This is expressed in Docket Request 21-0003. A major concern should be to understand the limits of the aquifer in providing sustainable water for a healthy nature and the effects that increased development will have. 'Trucked in' water and also water 'catchment' systems are not viable/sustainable water sources for these increasing times of drought we see happening. Maintaining the 'rural' characteristics of SJC with a healthy and protected nature is certainly of grave concern for local residents and visitors alike.

With regards to all the aforementioned concerns, humankind is part of nature and the fate of both is intertwined. A healthy, resilient nature will provide a healthy, resilient habitat for humankind.

Thank you for the work you have been doing and for your continued efforts in finding the best solutions to the challenges faced by San Juan Co and the surrounding communities of the Salish Sea.

Thank you for your quick reply back that you have received this letter to: [anne@awish.net](mailto:anne@awish.net).

Anne Whirlledge-Karp, former Lopez Island resident and small forest owner.

## Sophia Cassam

---

**From:** Jeffrey Bossler <jeffbossler@gmail.com>  
**Sent:** Tuesday, June 15, 2021 7:55 AM  
**To:** Erin Halcomb  
**Cc:** Sophia Cassam  
**Subject:** Re: SJC Proposed Tree Code: Public Comment

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

PS: Unless I was reading too fast, I don't think I saw anything in the PDF relating to deer protection for said planted trees. It's been my observation everywhere on Orcas that it takes at least 15 years for a newly planted tree to be "deer proof", enabling the cage or trunk protection to be removed, and if not protected, the tree will surely be destroyed. When a buck thrashes a tree, it is permanently injured and its lifespan drastically shortened. Even if the tree forms bark across the scar on its trunk, the process of rot and decay has already begun and will continue, critically weakening the tree.

There are other issues the County is not addressing adequately when the subject turns to waterfront screening trees, especially on shallow soils, regarding long-term viability, deer and climate challenges, and unrealistic expectations given current practices.

Jeff

[alpineseaside.com](http://alpineseaside.com)



On Tue, Jun 15, 2021 at 6:08 AM Jeffrey Bossler <[jeffbossler@gmail.com](mailto:jeffbossler@gmail.com)> wrote:

Hi Erin: / Dear Sophia:

Thanks for this! I finally made the time to read this, and it all looks pretty good to me. The one thing I really don't like is the chain link fence idea on construction sites. I've seen far too many construction fences and barriers remain on finished sites for years. I've worked in conjunction with many excavators who have all been as good as they are able to be regarding staying out of sensitive areas and keeping their foot print to a minimum.

While these codes of conduct are great in their intent, I am certain they will receive some pushback from individuals who have no sense of collective responsibility for our collective good.

In light of the die off happening with the deer, I also believe it is high time that a real discussion followed by real action on our longstanding deer problem if we are fully serious about preserving our ecosystem. The die off will only be a short respite for the empty shell of what was once an abundantly diverse ecosystem.

Natural recruitment of trees is nearly down to zero due to overbrowsing, and I've seen what I believe are island-wide extinctions of most of the traditionally historic spring wildflowers which gave the bees a jump start to good hive health. Short-lived flowering shrubs from Salmonberry to Elderberry are disappearing. Our canopy is thinning as trees die and are not being replaced, and what is left on the forest floor is being browsed to the ground. *No code of forest conduct will succeed without a routine check on the deer population.*

Pasted below is just one photo that represents the destruction of our ecosystem by an out of control deer population.



I've worked on this site for at least 15 years, and the environmental degradation has been impressive. Void of any excavators, tree cutting, or development, the once chest-high Salal has been whittled down to mostly dead sticks. The forest canopy is thinning due to trees that have been made weak by a buck's thrashing wound in the tree's infancy, and all tree seedlings are so heavily browsed and thrashed, there is no realistic hope of them ever becoming trees. I've watched every fern on these 80 acres be browsed to death and now the soil is bare and open to the sky with massive amounts of Tansy and field grass filling in.

I've worked with plants and forests full-time for the past 50 of my 66 years on this planet ... 33 of those years on Orcas, and I am certain that an unchecked deer population poses a much larger long-term threat to the San Juan Islands than does development and climate change combined. The only approach that works is to reduce their numbers back to a level consistent with a sustainable carrying capacity.

Thank you for the work you are doing! We need a lot of conservation effort everywhere and a lot of education and bodies to get the work done. I'd love to see more young people involved in both the concept of maintaining our collective assets inherent in our ecosystem as well as the healthy physical activities it takes to manage our forests.

Have a great day!  
Jeff

[alpineseaside.com](http://alpineseaside.com)



On Tue, Jun 8, 2021 at 5:01 PM Erin Halcomb <[erinh@sjclandbank.org](mailto:erinh@sjclandbank.org)> wrote:

Greetings,

Attached is a draft code to preserve trees and canopy cover in the County. Its overarching goal is to preserve the ecological function and benefits of trees in our community. It has three main mechanisms:

- 1) to prevent removal of large diameter trees, unless they are dangerous or meet other exemptions;
- 2) to include trees in building permit applications, along with a tree protection plan for any retained trees; and
- 3) to replace removed trees with new plantings to maintain a similar number of trees on individual properties.

The proposed code in full is attached. It allows for vegetation management on public lands and on properties where there is an established forest management plan. Much of this code is already in effect in many counties and cities in the Puget Sound who are improving their climate resiliency, stormwater management, and quality of life. Please note this is a separate effort from any forest land-use reforms (which do not apply to many smaller private parcels with trees). And, lastly, if it is adopted by the County Council, SJC planners would need to review/rewrite components.

If this effort interests you, please consider sending a letter of support for this initiative to:

Sophia Cassam at [sophiac@sanjuanco.com](mailto:sophiac@sanjuanco.com) by **June 14, 2021**.

Feel free to pass this on to your neighbors who care about trees, and to reach out to either Miles Becker (cc'd) or me if you have any questions.

Thank you,

Erin

**Sophia Cassam**

---

**From:** R. Brent Lyles <brent@sanjuans.org>  
**Sent:** Monday, June 14, 2021 1:01 PM  
**To:** Sophia Cassam; Comp Plan Update  
**Subject:** Comments on docket requests  
**Attachments:** 2021 Docket Requests - Comments from Friends of the San Juans - 14jun2021.pdf

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Sophia,

Please find attached a comment letter on the current docket requests before the Planning Commission.

If you could please respond to this email, to let me know that you've received this and it transmitted faithfully, I'd appreciate it -- thank you!

Respectfully,

Brent

o o o o o o o o o o o o o o o o

**R. Brent Lyles** (he/him) | **Executive Director** | **Friends of the San Juans**  
PO Box 1344 | Friday Harbor, WA 98250 | Direct: 360-378-2324, Cell: 512-773-9789  
[www.sanjuans.org](http://www.sanjuans.org) | [donate](#) | [facebook](#) | [e-news](#)



# Friends *of the* San Juans

360.378.2319  
[www.sanjuans.org](http://www.sanjuans.org)

P.O. Box 1344  
Friday Harbor, WA 98250

By Email

June 14, 2021

San Juan County Planning Commission  
c/o Sophia Cassam  
SJC Department of Community Development  
PO Box 947  
Friday Harbor, WA 98250  
[sophiac@sanjuanco.com](mailto:sophiac@sanjuanco.com)

Dear Planning Commissioners,

Thank you for the opportunity to comment on the County's 2021 Annual Docket ("Docket"). As set forth proficiently by the May 6th staff report, the Docket offers an excellent opportunity to plan for suitable Comprehensive Plan and development code amendments, and the proposals before you warrant careful review. We offer the concise comments below to address the proposals for commercial composting on agricultural lands, indoor recreational facilities, resource capacity analysis, floodplain development, tree conservation, and stormwater code updates.

## **A. Request 21-0001—Commercial composting on farmlands**

This request seeks to revise the County Code to authorize the installation of commercial composting facilities on designated agricultural resource lands through a provisional use or conditional use permit. At present, the Code authorizes commercial composting facilities on thousands of acres countywide in the following designations: Rural General use, Rural Industrial, Rural Commercial, and Forest Resource. County staff recommend opening up farmlands to commercial composting after completion of the Comprehensive Plan update.

While we ardently support increased opportunities for both commercial and non-commercial composting in the San Juans, we also vigorously support the use of agricultural resource lands for agriculture, rather than for industrial activities like commercial composting. We thus recommend that the County decline the invitation to open up farmlands to commercial-scale composting and that it continue to allow non-commercial composting consistent with the agricultural activities on those lands. While local commercial composting can provide benefits like keeping compostables out of the waste stream and returning material to local soils, those benefits do not require that commercial composting occur on farmlands. Indeed, due to the incompatibility of commercial-scale composting with agricultural activities,

neighboring Whatcom and Skagit Counties both prohibit commercial composting on agricultural resource lands, while authorizing composting associated with farming.

We encourage the County to investigate local commercial composting infrastructure that could be constructed and operated on the thousands of acres already zoned for it. We understand that the Port of Friday Harbor and the Exchange on Orcas have expressed interest in such facilities. In addition to serving people who don't have the ability to compost at home, commercial-scale composting could help our community transition away from single-use plastics and toward materials that can break down and provide a valuable natural feedstock. Many communities have already chosen this path, and we encourage you to begin planning for our community to join them.

**B. Request 21-0002—Indoor recreational facilities on rural farm forest lands**

This request seeks to amend the Code to permit indoor tennis facilities on Rural Farm Forest lands throughout the county. At present, the Code authorizes indoor recreational facilities on lands designated village and hamlet commercial and industrial, rural general use, and rural commercial. In the event that the County wishes to amend the code per the request, staff recommend that a conditional use permit apply to the development of new indoor recreational facilities or indoor tennis facilities.

We support the staff recommendation, and believe that the conditional use permit process could guide the development of indoor recreational facilities to prevent impacts on their surrounding neighborhoods. Given the potential aesthetic impacts associated with large new structures, it would also be reasonable to include a screening criterion or direction to construct such facilities at a significant distance from neighboring properties.

**C. Request 21-0003—Resource capacity analysis**

We support the request to prepare a resource capacity analysis that takes the results of the County's 2018 Land Capacity Analysis and evaluates the impacts of that buildout on our community's quality of life. Such analysis would include a review of water availability to serve both the legal amount of water that can be withdrawn and the amount of water likely to be used based on current use patterns and trends indicating increased use. It would also identify transportation needs within and to the San Juans, projected energy needs, the soils' capacity to handle septic waste, emergency evacuation needs, health care needs, waste management, food supply, and housing needs for local employees and whether the high level of temporary housing use (we understand it to be approximately 40%) could accommodate the housing needs at full buildout.

#### **D. Request 21-0004—Floodplain development proposal**

This request seeks a Code revision so that agricultural and accessory structures could be built in Special Flood Hazard Areas without a variance if they were constructed of flood damage resistant materials and/or built to allow water to flow through them. Currently, such structures must be elevated to avoid flooding impacts unless an applicant obtains a variance to construct them in flood zones. Staff recommend against this revision in large part because the option is available with a variance. We strongly support the staff recommendation and believe that the variance process will continue to allow such construction where appropriate while protecting important flood zones from impacts of that development.

#### **E. Request 21-0005—Tree conservation code provisions**

This request seeks to: (1) to consolidate all Code provisions regarding trees in one location; and (2) add general tree retention and protection standards to the Code. The new tree standards would: (a) protect trees from unintentional destruction during construction; (b) maintain tree canopy; (c) establish general tree retention standards; and (d) protect significant and exceptional trees and groves. Staff recommend against consolidating all tree protections into one code location and did not provide a recommendation on whether to take up the new tree standard proposal.

To avoid confusion, we agree with staff that the tree protection standards installed in the Shoreline Master Program and Critical Areas Ordinance should not be consolidated into a single section. We also recommend that the County enact tree standards similar to those provided by the proponent. Unlike many jurisdictions, our Code does not currently provide general tree protection language. Friends of the San Juans regularly fields calls from community members who are concerned about non-forestry clear-cutting of lots and who then become distressed to learn that much of the extensive tree cover we enjoy in the islands is not protected and has been retained more by accident than intent. Because those trees provide many benefits beyond beautiful landscapes and rural character – from essential habitat to carbon sequestration and more – we strongly support the adoption of general tree standards. The sample language from Mr. Becker provides an excellent starting point.

#### **F. Request 21-0008—Stormwater code updates**

This proposal would amend the Comprehensive Plan and update the County Code with language consistent with current stormwater standards to improve environmental protection, address stormwater runoff, control erosion and sedimentation, and promote aquifer recharge. Staff have already identified the need to update the stormwater code and propose adding the Comprehensive Plan language during the current update and to take up the stormwater

regulation update in 2022-23.

We heartily support the staff recommendation. We understand that the County's Environmental Resources unit is actively involved in this effort to modernize stormwater provisions, and we are confident that they will be able to play a valuable role in this update. We look forward to this legislative update.

Thank you for your consideration. We welcome any questions you have.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Brent Lyles", with a long horizontal stroke extending to the right.

R. Brent Lyles, Executive Director