



Via Email: sophiac@sanjuanco.com

San Juan County Council
350 Court Street, No. 1
Friday Harbor, WA 98250

Dear County Council Members:

Thank you for the opportunity to comment on the County's 2021 Annual Docket ("Docket"). The following four issues are of great concern to Transition Lopez Island as they contribute directly to the present and future resilience of our community: commercial composting on agricultural lands, resource capacity analysis, tree conservation, and stormwater code updates.

1. 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. County staff recommend opening up farmlands to commercial composting after completion of the Comprehensive Plan update. **We disagree with this recommendation** and strongly support reserving the use of these highly protected and valuable Agricultural Resource Lands solely for agriculture, continuing to allow non-commercial composting consistent with the agricultural activities on those lands.

We wholeheartedly endorse increased opportunities for both commercial and noncommercial composting in the San Juans. 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 soil amendment/fertilizer. However, opening up designated Agricultural Resource Lands to commercial composting is incompatible with the intended use of such land. Instead farmland not set aside as designated resource land should be used for commercial composting. We also 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.

2. Request 21-0003—Resource capacity analysis

Despite an enormous amount of public support for this, the County staff convinced the Planning Commissioners that doing a thorough build-out analysis isn't feasible or valuable. The Planning Commission tried to find a middle ground and ask for a more limited analysis, but now the

County staff is pushing back against that too. We agree that a full build-out analysis is a big project, but given the realities of rapid development in our County and the climate crisis, the critical information that our County would get from this analysis is just simply too important to defer this action any longer.

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.

3. Request 21-0005—Tree conservation code provisions

We're glad to see the County staff and Planning Commission members taking this seriously, and **support their recommendation to move forward with this.** 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. Because 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.

4. 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 especially promote aquifer recharge, both after stormwater and other precipitation events. 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** and look forward to this legislative update.

Thank you for your attention to these critical matters!

Transition Lopez Island Steering Committee

Ande Finley, Henning Sehmsdorf, Scott Finley, Ron Metcalf, Clarissa Szabados-Mish, Mike Moore, Bob Gerfy, Liz Lafferty, Chom Greacen, Kim Foley, and Ryan Palmateer