



Friends of the San Juans

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TO: Port of Orcas

FROM: Tina Whitman, Science Director

SUBJECT: Master Plan Update

DATE: September 7, 2018

Friends of the San Juans appreciates the opportunity to provide input to the Port of Orcas Master Planning process and respectfully submits the following comments, primarily related to the lack of sufficient detail on relevant natural resources and associated regulations that affect future development at the Port of Orcas including wetlands, shorelines, cultural resources and land use.

Wetlands

Wetlands are a high value habitat type that provides multiple public benefits including water quality, fish and wildlife habitat, and flood attenuation. As a result, wetlands are protected under local, state and federal laws. With extensive, known wetlands on and adjacent to the airport, as well as current active wetland mitigation required to rectify recent Port of Orcas violations, it should come as no surprise that the management of wetland habitats will play a major role in the design and selection of alternatives under the master planning process. The current level of detail regarding the wetlands themselves, as well as the impacts to them from the various design alternatives and phasing, is not sufficient.

Each wetland should be clearly identified in each of the master planning documents (site plans, alternatives evaluation tables, introduction to the development alternatives report) including clear identification for each individual wetland, the wetland category or rating, as well as the associated buffers for each wetland. Description and evaluation of each alternative/phasing must also demonstrate how it follows the required local, state and federal wetland mitigation sequence of avoidance, minimization, and lastly, compensatory mitigation, with estimated square footage or acreage of impacts in the wetlands and their buffers clearly defined for each of the alternatives/phasing.

Right now the only place where wetland impacts are even mentioned is the evaluation of alternatives table where impacts to wetlands are defined as 'none', 'none anticipated', 'minor' or 'potential' in earlier draft documents and as none, potential, yes or no in the materials provided September 5, 2018. No discussion at all of the type and size of wetlands present, avoidance of impacts or likely impacts are provided in the development alternatives report. Without any associated documentation of the wetland values, rating and area of impact, the findings in the evaluation table cannot be credibly

supported. As wetland mitigation can also have a large impact on the cost estimates of the various alternatives, sufficient detail is required on avoidance of likely impacts to wetlands of each of the alternatives to inform cost benefit analysis.

In addition to more clearly identifying potential future impacts to wetlands, consistency of the proposed design alternatives with the existing required mitigation actions from the wetland violations that occurred in 2017 to multiple wetlands on Port of Orcas properties must also be addressed. For example, the rerouting of Mount Baker road illustrated in the new Figure 3. Ultimate Development or the previous Figure 9. Runway 34 RPZ Alternatives figure will directly impact the wetland, including those areas currently the subject of required mitigation action to restore function, yet no detail is provided beyond 'potential impacts to wetlands' or 'yes' in the table. Mitigation sites should have long-term protection and subsequent development should avoid impacting the mitigation area and associated buffer.

Shorelines

There is no discussion of the shoreline environment in any of the documents produced to date in the master planning process. Multiple relevant issues related to marine shorelines should be reviewed and used in both the development and evaluation of design alternatives and phasing including: the Shoreline Master Program jurisdiction (200 feet from the ordinary high water mark and all associated wetlands) and required protective regulations; the fact that the largest wetland on the Port property is an estuarine, coastal wetland; and the fact that significant Port infrastructure and proposed future developments and property acquisitions are located within mapped coastal flood hazard zones. At a minimum, the shoreline jurisdiction and floodplain boundaries should be clearly marked on all design alternatives/phasing site plans, and as with wetlands, sufficient detail on how the various alternatives will avoid, minimize and compensate for unavoidable impacts (see San Juan County Code § 18.50.140). The projected area of impact and effects on the function of the estuarine wetland as well as marine shoreline and floodplain habitats must also be included. As coastal erosion and flood hazards are expected to increase with rising sea levels and more frequent and larger storm events, any long range planning for the acquisition of new property or development of new permanent infrastructure must include consideration of likely potential effects. As with wetland mitigation, costs to fortify low lying coastal infrastructure as well as the associated mitigation for impacts to shoreline habitats can be substantial and may influence the selection of a preferred alternative.

Cultural Resources

No mention of cultural or historic resources are made in any of the Master Plan documents. Marine shorelines and associated coastal wetlands within the San Juan Islands, including north Orcas were

heavily utilized by multiple area Tribes and First Nations. The State Environmental Policy Act requires an evaluation of proposed development in these areas that must include adequate identification of the cultural and historic resources present and plans to avoid impacts. As with natural resource mitigation, the presence of cultural resources can add substantially to the costs of the various design alternatives and timely understanding of the likelihood of encountering protecting cultural resources is essential.

Land Use

The Orcas airport is located in close proximity to substantial residential and commercial development in the Eastsound subarea. Potential impacts to neighboring uses should be explicitly included in the master planning process, in both the development and evaluation of alternatives. Multiple methods exist for the Port to improve its understanding and consideration of local land use concerns, including expanding participation in the master planning committee and identifying relevant plans and policies that will impact the ultimate success of any preferred alternative.

The proposed master planning committee is heavily weighted towards airplane-dependent and other commercial interests; efforts should be made to expand committee participation to better include residential interests. With significant proposed changes to public infrastructure included in the design alternatives, it is logical for the Port to involve the San Juan County Public Works Department; their expertise in planning public projects, as well as public engagement could further improve the process.

In addition, while the master planning website references future environmental analysis, it would be prudent for the Port to identify the relevant plans and policies and how they may be supported by or are in conflict with the proposed alternatives at this stage of the master planning process. These include, but are not limited to: the Eastsound subarea plan, the San Juan County Critical Areas Ordinance, the state Shoreline Management Act and county Shoreline Master Program as well as federal Clean Water and state Water Pollution Control Acts, as well as National Historic Preservation and Endangered Species Acts. As just one example of why this type of review is essential at this stage of the process, the proposed September 5, 2018 Short Term Development (Figure 1) actions include acquisition of additional shoreline property; yet the fact that this property is located in a shoreline designation under the county's Shoreline Master Program that specifically prohibits airport and non-water dependent uses is even not mentioned (San Juan County Unified Development Code 18.50.600). Substantial recent information on community values and perspectives for the future of Eastsound are also available as part of the comprehensive plan update process and could inform the Master Planning process.

In summary, significant additional detail to wetland, marine shoreline, cultural resources and land use issues are needed to improve the quality of the various development design options being proposed, the evaluation of the alternatives as well as the public's ability to meaningfully review and provide comment. Thank you for your consideration.

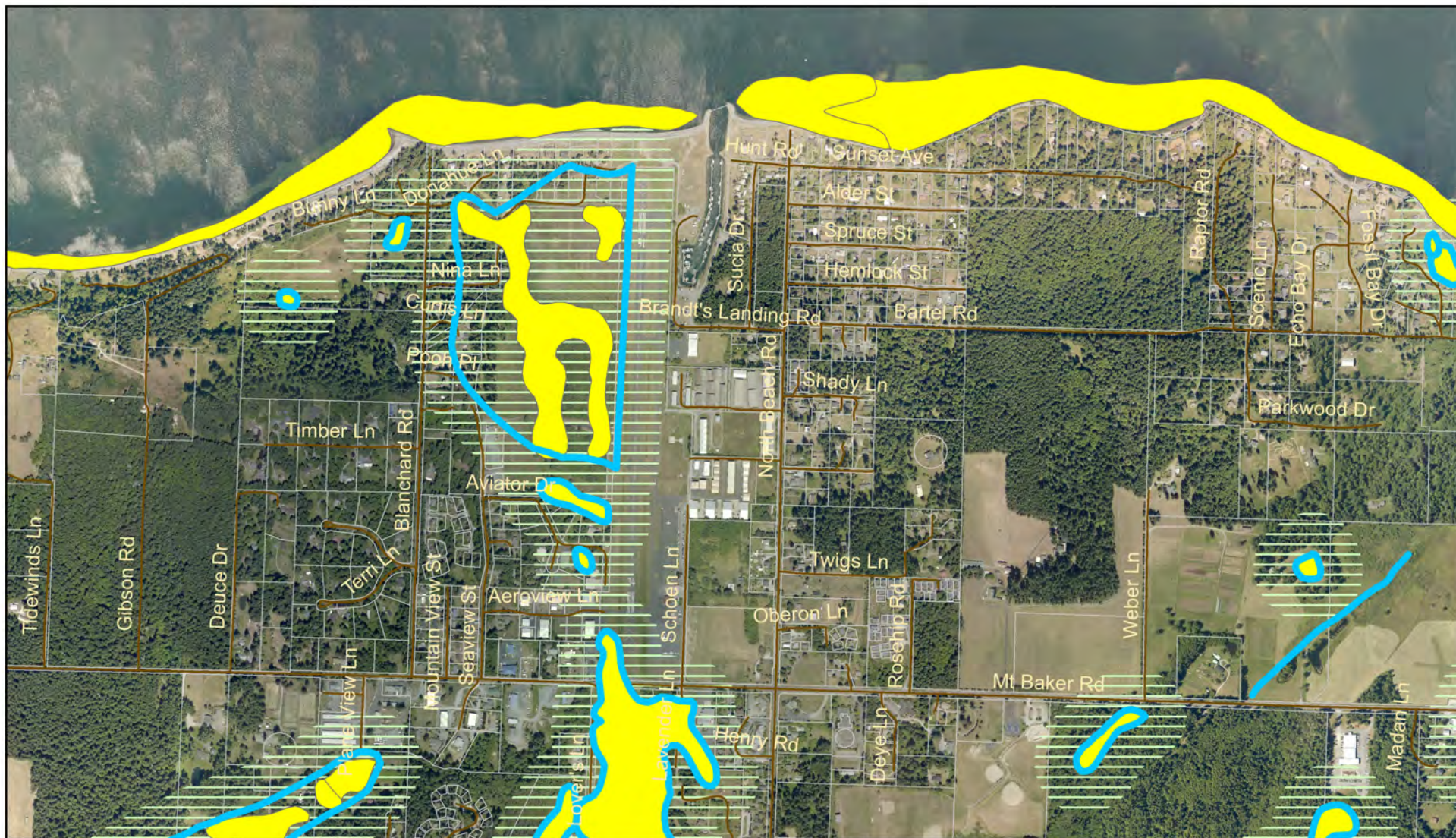
Attachments:

- a) Port of Orcas region, Eastsound wetland habitat map
- b) Port of Orcas region, Eastsound shoreline resources map
- c) Port of Orcas region, Eastsound parcel and building map
- d) Port of Orcas region, Eastsound floodplain map
- e) Port of Orcas region, Eastsound sea level rise vulnerability map

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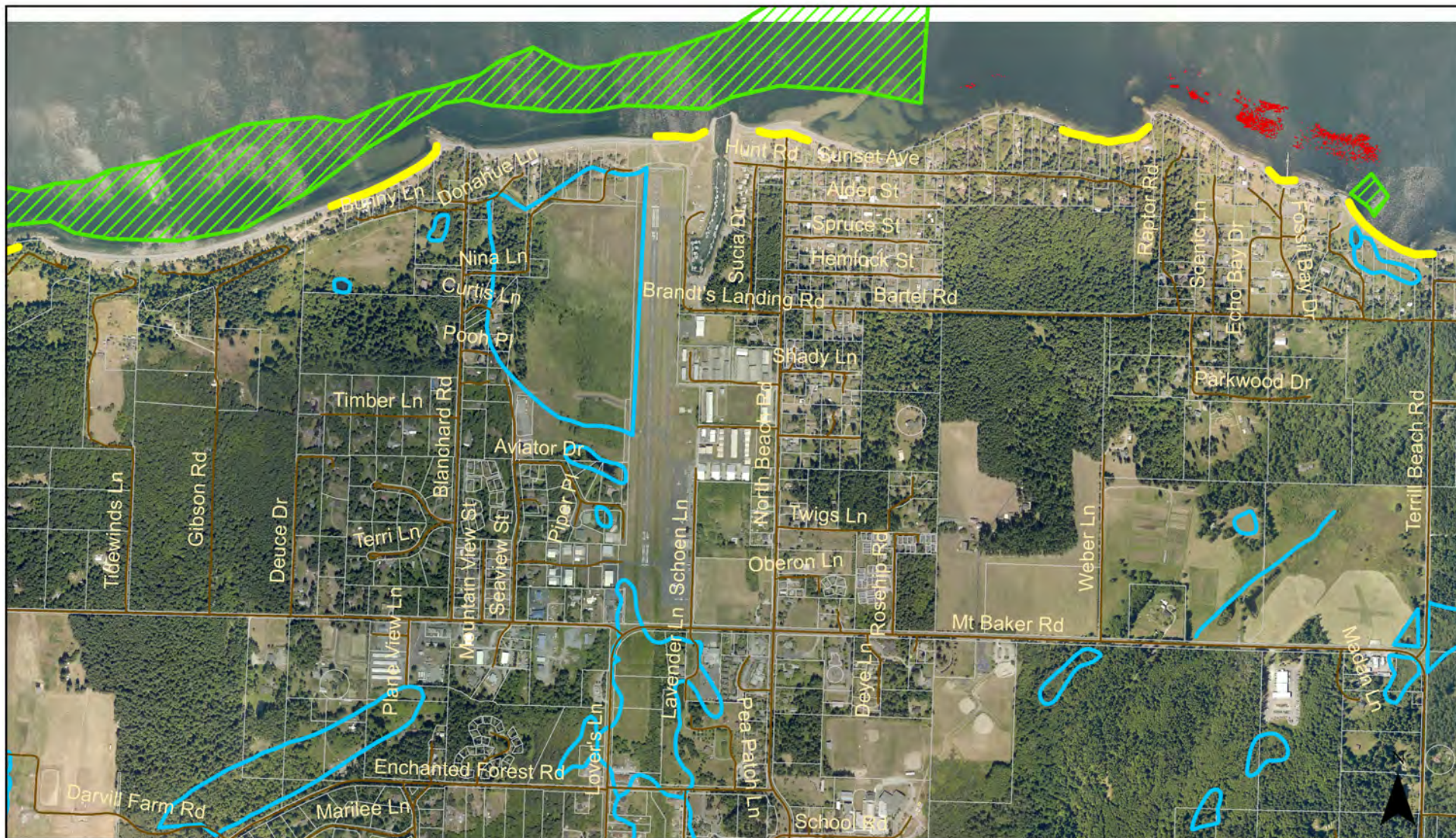
Paul Kamin, Chair Eastsound Planning Review Committee

Doug Gresham, Washington Department of Ecology



Port of Orcas Region, Eastsound Orcas Island: Wetlands

- Wetlands and Streams (SJC)
- NWI_Wetlands
- County Roads (SJC)
- Wetlands_300ft_buffer (SJC)



Port of Orcas Region, Eastsound Orcas Island: Critical Habitat

- Forage Fish Potential Spawn Habitat (WDFW and FSJ 2004)
- Bull Kelp (FSJ and DNR 2007)
- Wetlands and Streams (SJC)
- Eelgrass (FSJ, DNR, and UW 2004)



Port of Orcas Region, Eastsound Orcas Island: Building and Parcels

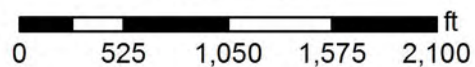
Building_Footprints
 County Roads (SJC)
 Parcel_Link



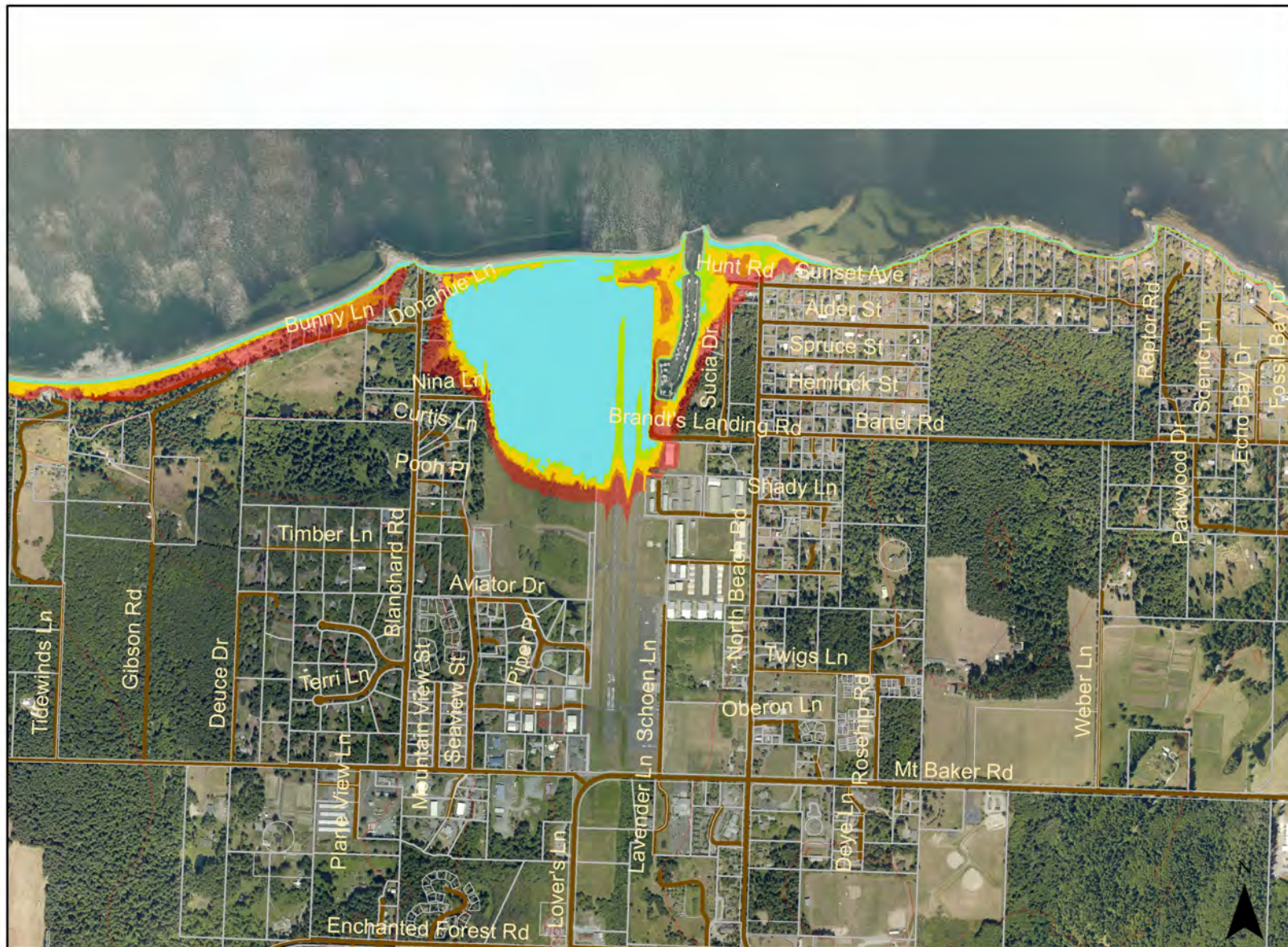


This map is derived from San Juan County's Geographic Information System (GIS). It is intended for reference only and is not guaranteed to survey accuracy. The information represented on this map is subject to change without notice

1 in = 1,000 feet



FEMA Floodplain



**Port of Orcas Region, Eastsound Orcas: Potential Inundation Hazard Map
SJC Sea Level Rise Vulnerability Analysis (MacLennan and Johannessen 2014)**

