



ISLAND COUNTY MARINE RESOURCES COMMITTEE
www.islandcountymrc.org

c/o Island County Department of Natural Resources
PO Box 5000
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February 4, 2026

Subject: Marine Resource Committee Response to Island County's 2025 Comprehensive Plan Draft

To the Island County Comprehensive Plan Team,

The Marine Resource Committee (MRC) welcomes the opportunity to provide comments on the draft Island County 2025 Comprehensive Plan. The MRC's goal is to protect and restore marine resources in Puget Sound. However, marine resources are related to the land surrounding Puget Sound, and, as such, it is incumbent upon the MRC to emphasize the areas of the Comprehensive Plan that have a bearing on the health of the eel grass, kelp, forage fish, salmonids, and apex animals such as whales. The time scale of the Comprehensive Plan providing guidance for the next 20 years means that it is imperative that it consider the longer term predicted changes to the natural systems such as the water cycle and sea level rise.

The Plan is an important tool for guiding development and warrants the extensive time and efforts by the staff and Commissioners to date. We have provided comments at earlier stages of the process and appreciate how the plan has developed over time. Our current comments are organized according to broad themes and individual elements.

Overarching Themes

The staff report dated December 10 provides a helpful summary of the process and conclusions of the planning effort. The summary of key themes is particularly helpful. The key themes are listed and related to the various elements that address them. We believe this material is expressed very well and is more compelling than the summary of themes in the Draft Comp Plan introduction itself. We provided a similar listing of themes in our July 10 comment letter. We recommend that the listing of themes be expanded to include the following:

Theme 6: Protect natural lands from development using best available science, **PREDICTIVE MODELS**, a no-net-loss approach, and strategic conservation...

New. Preserve and enhance public access to shorelines and tidelands as resources for residents and visitors, including those who **DO NOT** own shore and/or tidelands, as well as those who do, while respecting tribal rights. (Land Use, Natural Resources, Capital Facilities, Economic Development, Parks Recreation and Open Space, Climate, Economic Development, and Transportation Elements),

New. Initiate strategic reliance upon enforcement of regulations to assure compliance (Land Use, Housing, Natural Resources, Capital Facilities and Utilities, Parks Recreation and Open Space, Climate, Economic Development, and Transportation Elements),

Climate Element

This element is a valuable addition to the Comprehensive Plan. The introduction and framework section provides a list of community assets and priority climate hazards. The element would benefit from a substantive discussion of conditions and issues. The MRC 2024 White Paper on Climate Change provides such a discussion. Our paper could be summarized in the introduction and be included as one of appendices.

Further, we recommend the following changes to the draft Goals and Policies.

New. Explore all data sources to estimate water flowing into and out of specific aquifers to inform decisions. The MRC considers that freshwater quality is directly related to marine water quality. Similarly, ground water is directly related to surface water. In an era of increasing droughts and deluges, it is important to consider the interrelationships between storm water, surface water, ground water, runoff, infiltration, and the impact to marine water quality.

New. Support data collection to monitor effects on marine resources such as shellfish, forage fish, kelp, eel grass, and salmon.

New. Prohibit new septic systems within projected flood areas.

New. Restrict use of hard armoring to protect marine ecosystems while recognizing the legal rights of private property owners.

Natural Resource Element

The recommended changes to goals and policies since the earlier drafts included welcome additions related to use of incentives, regulation of development in frequently flooded areas, encouragement of community septic systems, strategies such as cluster development to preserve natural lands, and access to beaches. We recommend the following additional changes.

NR 9.3. Enhance recreational opportunities for County residents and **VISITORS**, including those who **DO NOT** own shore and/or tidelands, as well as those who do, while respecting tribal treaty rights.

New. Provide access to mitigation bank as an option when on-site mitigation is not feasible.

New. Designate land for renewable energy and carbon sequestration.

New. Repurpose land that is subject to repeated inundation as land that would be best used for wetlands and/or carbon sequestration.

Capital Facilities and Utilities Element

The recommended changes to goals and policies since the earlier drafts included welcome additions related to level of service standards, climate related hazards, facilities for reuse,

recycling and composting, and exploration of creation of Public Utility Districts. We recommend the following additional changes.

Add back previous CFU 6.1.4. Consider the use of alternative sewage treatment techniques in areas that contain a significant concentration of critical areas, will be impacted by extreme rain and coastal flooding, or which have topographic challenges, discharge constraints, or critical aquifer recharge areas.

New. Incentivize community-scaled wastewater treatment solutions which provide economies of scale and minimize detrimental impacts.

Parks and Open Space Element

The recommended changes to goals and policies since the earlier drafts included welcome additions related to sustaining and creating more wildlife corridors and beach access to all types of persons (specifically including ADA). The goals and policies do not directly address several issues that are likely considered in other elements such as septic systems, protection of nearshore habitat, climate change, aquifer recharge, and historical issues including tribal activity. A reference to such issues and the associated elements would be valuable.

Economic Development Element

The recommended changes to goals and policies since the earlier draft provide more distinct and actionable items. There are several policies that relate to marine resources including environmentally responsible development, water-related uses, enhancement of natural resources as economic drivers, and aquaculture. The relationship of marine resources and the economy deserves discussion as an overarching theme in the introduction to the document.

We recommend the following additional changes.

New. Recognize the importance of marine resources to economic opportunities given the county's relative uniqueness as one of only two counties in Washington comprised entirely of islands.

Transportation Element

The recommended changes to goals and policies since the earlier draft provide more distinct and actionable items. There are several policies that relate to marine resources including local evacuation plans for coastal areas, public beaches for human-powered watercraft access, transportation access to recreational opportunities, and revised level of service standards.

Land Use Element

The Land Use element addresses the balance of assuring adequate land for population and employment growth with health safety and preservation of natural resources. Several of the goals are related to preservation of marine and other natural resources. The second goal calls for directing growth to areas urban growth areas where services and facilities can be provided efficiently and consistent with environmental goals. Consistent with that goal, we recommend the following explicit policy.

New. Incentivize community-scaled wastewater treatment solutions which provide economies of scale and minimize detrimental impacts.

In addition, we recommend the following policies that support responsible land use policies more generally.

New. Incentivize Low Impact Development (LID) to direct stormwater runoff.

New. Ensure that unpermitted existing structures are not the recipient of any governmental grants or loans to enhance or rebuild.

New. Apply strategic enforcement to discourage flagrant disregard of policies.

New. Allow use of credits from certified mitigation banks when on-site mitigation is not feasible.

Housing Element

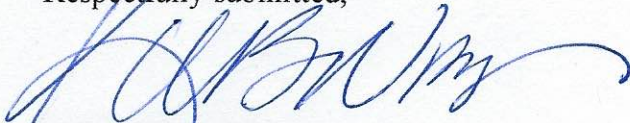
The Housing Element addresses issues primarily related to housing needs and affordability. While none of the goals are directly related to marine and other natural resources, the second goal could be expanded to address “diverse housing types in locations where ... community services and **RECREATIONAL RESOURCES** are readily accessible...”

All Elements

As noted in the overarching themes discussion on the earlier page, various issues and policies cut across multiple elements. Many of the policies identified for the above elements could be included in other elements as well. These relationships could be highlighted through a regulatory crosswalk among the Comprehensive Plan, Shoreline Master Program and Hazard Mitigation Plan.

Thank you for your consideration.

Respectfully submitted,



Kelly Webb, Chair
The Island County Marine Resources Committee