

Whidbey Environmental Action Network  
PO Box 293, Langley, WA 98260

Submitted to Island County via email Tuesday January 13, 2026

**Feedback on the Draft Climate Element: Please plan for proactive coastal retreat and ecosystem restoration**

*Please include these comments in the official public record regarding the Climate Element of the 2025 Comprehensive Plan update. These comments are submitted pursuant to the public participation requirements of the Growth Management Act (RCW 36.70A). I request that these comments be included in the final record of adoption and that I be notified of all future hearings, work sessions, and final actions regarding this matter.*

Dear Commissioners, Staff, and Planning Commissioners,

We appreciate the positive foundation of this draft, particularly its comprehensive asset inventory, identification of priority hazards and vulnerable populations.

To truly fulfill the mandate of the GMA for climate resilience, maximize benefits, prioritize environmental justice, and protect Island County's irreplaceable natural heritage, we recommend the following improvements:

**1. Strengthen language from aspirational to mandatory**

- Replace weak verbs: Substitute "consider" (e.g., Policy CL 11.2) with decisive language like "implement," "require," "design," or "adopt." The term "consider" provides a regulatory loophole and fails to demonstrate a commitment to action.
- Remove qualifying phrases: Strike "where feasible" from policies like CL 4.3 (Low-Impact Development). Such clauses are routinely used to circumvent best practices.

**2. Specify and strengthen protections for critical natural areas and functions**

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- Name significant habitats explicitly: Move beyond generic terms like "grasslands" and "nature preserves." The plan must explicitly name and mandate protection for specific, threatened ecosystems like the Northern Puget Sound Glacial Outwash Prairie and Coastal Bluff Prairie.
- Mandate robust buffers: Policy should require significant buffers for all Critical Areas (wetlands, streams, shorelines) to ensure ecological function and climate resilience, not merely "protect" them. Base these buffers on based on the best available science, and allow for expansion of buffers according to site-specific needs of particular habitat/ecosystem
- Expand water conservation scope: Policy CL 4.2 should apply water conservation methods to all irrigation, not be limited to parks and recreation areas.

**3. Embrace proactive and equitable planning for climate impacts**

- Address managed retreat: The plan must initiate the difficult but necessary conversation on strategic relocation and managed retreat for infrastructure (including septic systems) in areas of high-risk inundation from sea-level rise. Policies on evacuation routes (CL 7.8) are reactive; proactive land-use planning is required. This issue is at the heart of Island County's commitment to Health, Equity, and Climate, and shirking this responsibility makes us all more vulnerable.
- Develop concrete infrastructure plans: The draft lacks a clear strategy for adapting road and infrastructure elevation in the face of sea-level rise, especially where existing dikes are failing. A funded, actionable plan is needed.
- Universal pollution prevention: Policy CL 3.5 should prohibit the expansion of polluting industries countywide, not only in "overburdened communities." Environmental justice requires preventing new pollution burdens for *all* communities.

**4. Clarify definitions and agency coordination**

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- Define key terms: Crucial terms like "Climate Smart Forest Management" and the process for an "environmental justice audit" (CL 3.2) must be clearly defined in the Glossary or through written procedure to ensure transparency and consistent implementation.
- Specify agency roles: Policy CL 4.8 (chemical hazards) should explicitly name responsible agencies (e.g., Public Works, Weed Board) and mandate coordination to avoid defaulting to chemical-intensive "quick and dirty" approaches.

## **5. Enhance forestry, fire, and carbon sequestration policies**

- Assert local authority for protection: Island County should explore and assert its authority to enforce Critical Areas Ordinances on forestlands for ecological resilience, challenging the presumption of DNR's sole authority, especially since we are on record with Washington State as having no forest lands of long term commercial significance.
- Promote ecological fire management: Expand Policy CL 7.7 beyond reactive "burn bans" to proactively promote ecologically beneficial fire. The policy could:
  - Promote alternatives to harmful slash burning (e.g., lop-and-scatter, chipping).
  - Explicitly support the use of prescribed fire as a tool for hazardous fuel reduction, ecosystem restoration, and climate adaptation.
  - Recognize and support cultural and traditional Indigenous burning as vital stewardship practices.

### **Additional opportunities to correct, clarify, and strengthen the Climate Element:**

In 11.2.2 you reference over 170 assets. Can we get the list? Public review should include the list for clarification, addition, and deletion.

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The Community assets table seems to veer into natural hazards as well as climate. Not a bad thing, but does the county have a natural hazard plan or inventory of vulnerabilities through that lens?

In Table 11.1 you reference natural gas pipelines. Are there any? We believe that in the past the county has stipulated that no gas pipelines are to be allowed unless they served the local population. Restating that somewhere in this draft might be wise.

The climate hazards list below the table is so generalized as to be rendered meaningless. They seem to be taken straight out of someone else's generalized article.

\* Drought

\* Extreme Precipitation

\* Flooding

\* Reduced Snowpack

\* Sea Level Rise

Please be more specific with your locally relevant priority hazard identification. In particular, your list doesn't include "increased storm severity." It says "Extreme Precipitation", but that doesn't account for wind, waves, and all of the other complex factors that make up a storm vs just precipitation. "Increased storm severity" is what the state is planning for in SMA rulemaking, so it would make sense that the county would plan for the same hazard, as it pertains to our islands in particular.

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Also within that section, it says that "priority climate hazards were identified based on the County's existing plans and anecdotal information," which suggests a backward-looking, incomplete analysis of this particular area. I appreciate that they used the CMRW, the Coastal Hazard Resiliency Network Sea-level tool, and the USGS groundwater database; however, for future predictions of climate hazards, it would be useful to include the most comprehensive climate modeling available (using BAS) in this analysis, in addition to real-time events and lived experience.

In 11.3.1 Goal 2, "Protect and restore undeveloped coast ecosystems," this goal leaves out ecosystems that have been developed and will need to be restored based on changing conditions and best available science, as well as due to a lack of permitting (an unpermitted bulkhead is a developed shoreline that will also need restoration).

In CL 1.5, "educate permit applicants on the climate-associated risks", Is there going to be a notice on the title of properties most subjected to SLR? Requirements for removal insurance? Otherwise, we're just passing a hot potato from owner to the next.

In CL 2.1, please include mapping and protection from development for future coast, estuarine systems, etc. and needs to address structural abandonment.

In CL 2.2, please change "... including submerged ..." to "... including current and future submerged ..."

In CL 3.5, "where exposure to climate hazards" should read, "where exposure to current and future climate hazards"

While we recognize the importance of an environmental justice audit, we caution you not to conflate this with protecting the wealthiest, with their second and third homes disproportionately represented among shoreline homes, from rezoning.

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Under CL 4.2, "Utilize water conservation methods and technologies in development of irrigation infrastructure within parks and recreation areas to foster climate resilience," add to include private water consumption for watering lawns. Similarly, a policy of encouraging water-wise agricultural practices would fit well here. There are water conservation methods, technologies, and practices available to farmers, gardeners, landscapers, and ranchers that could be encouraged. The use for parks pales in comparison to use for private and agricultural purposes.

Retaining forest cover is conspicuously absent from "Manage water resources and sole source aquifer sustainably in the face of climate change through smart irrigation, stormwater management, preventative maintenance, water conservation and wastewater reuse, plant selection, and landscape management.". Please add.

Thank you for your inclusion of, "Encourage onsite gray water reuse systems to reduce water demand in private-sector commercial and residential buildings."

In CL 5.5, add "... wildlife dispersal and movement corridors . . ."

Goal 6, which reads, "Ensure the protection and restoration of streams, riparian zones, estuaries, wetlands, and to achieve healthy watersheds that are resilient to climate change", needs to explicitly address newly forming aquatic coastal systems—the estuaries and wetlands of the future as SLR remaps our shores.

Please also state that Goal 6 applies to all such areas, not just those currently mapped and identified.

In 7.7, consider "Reduce wildfire risk by enforcing Type 1 burn bans, establishing wildlife corridors, promoting native vegetation and prescribed burns, and maintaining robust habitat buffers."

In 7.9, Is the County's Community Wildfire Protection plan available? Can it be linked here for community review?

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Likewise, is the local hazard mitigation plan available for review? Under “reduce wildfire risk by enforcing burn bans,” edit to read, “. . . bans while allowing use of prescribed fire to reduce fuel loads on forest land and to conserve prairies and savannas.”

In CL 5.2 We have questions about “Enhance resilience by supporting upgrades to airport facilities to serve as critical infrastructure for emergency response, evacuation, and supply distribution during extreme weather events or other climate-related disasters.” Supporting acquisition of public shorelines, boat launches, wetlands, forests, and aquifer recharge areas have the potential to be more broadly supportive of resilience, and we would recommend the county not constrain their future funding commitments by promising upgrades to airports when those competing economic priorities may weigh more heavily.

In CL 10.10, the “urban heat resilience strategy” needs to coordinate with and include municipalities (i.e., OH). Under Review land use maps and identify opportunities or barriers to responding to rapid population growth or decline, rebuilding housing and services after disasters, and other extreme climate impact scenarios., amend to conclude, “. . . while recognizing that there are shoreline areas where human habitation is no longer defensible . . .”

In CL 11.3, don’t just “consider.” Not just consider. “Begin implementing ordinances to maintain and increase . . .”

In CL 11, “Tree canopy cover” should be changed to “. . . maintain and increase forest Carbon stocks . . .” 100% canopy cover of 20 year old trees is not a lot of sequestered Carbon. CL 11.5, could be clarified to read “Ensure that forest management plans include consideration of the amount and impact of Carbon emitted as a result of forest management, including logging.”

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## **Conclusion**

Thank you for your work to increase the climate resilience of Island County. Taking this work a step further by incorporating the recommendations above—moving from optional to mandatory language, leaning into the hard but necessary proactive strategic relocation planning that sea level rise will require, and encouraging climate-wise land stewardship with greater specificity—will yield safer, healthier, and more equitable conditions for generations to come.