

Whidbey Environmental Action Network
PO Box 293, Langley, WA 98260
(360) 222-3345
www.whidbeyenvironment.org

Submitted Monday February 2, 2026

Feedback on the Draft Economic Development Element: Moving from Extractive Growth to a Circular, Resilient Economy

Please include these comments in the official public record regarding 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 we be notified of all future hearings, work sessions, and final actions regarding this matter.

Commendation on Strategic Direction

We commend the County for acknowledging that Island County's rural character and natural environment are not merely aesthetic preferences but are direct economic assets. This recognition is essential and we thank you for it. Several key policies in the 2025 Draft correctly respond to the need for a more self-reliant local economy:

- **Diversification and Resilience:** The Draft identifies the risks of an economy over-reliant on external factors.
- **Focus on Local Wealth:** Policies supporting living wage employment and value-added agriculture and forestry align with the goal of retaining wealth within the community.
- **Asset-Based Development:** The statement that economic vitality and environmental preservation are complementary and not mutually exclusive is a vital step toward integrated planning.

Recommendations: Closing the Gap to Meet GMA and Climate Imperatives

While the Draft uses language regarding sustainability, it remains largely rooted in a linear, extractive economic model. To fully comply with the GMA's mandate to protect the environment and enhance the state's high quality of life (RCW

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36.70A.020) and to prepare for climate-related fiscal risks, the following revisions are recommended.

1. Address Indigenous Presence

The opening line either erases or includes, but with no nuance, indigenous settlement—it's hard to know which. Please address the 10,000+ years of inhabitation during which the island was valued for the food and resource richness—central to indigenous economies—of sustainably stewarded ecosystems.

2. Formally Pivot to a Circular, Locally-Owned Economy

The Shuman Report, provided as prior input, reveals that for every dollar spent by residents, 59 cents "leak" out of the county. The current Draft falls short in attempts to prioritize the locally owned, import-substituting (LOIS) businesses essential to plugging these leakages and building resilience.

- **Request:** Explicitly pivot the economic strategy to embrace circular economy principles—minimizing waste, keeping products and materials in use, and regenerating natural systems. This means:
 - Supporting business incubators for repair, refurbishment, and remanufacturing sectors.
 - Developing or partnering for a county-wide organic waste-to-compost program to serve local agriculture and reduce costs.
 - Creating procurement policies that favor locally sourced, durable, and recyclable materials for county projects.

3. Implement True Cost Accounting for Informed Decision-Making

Traditional economic analyses externalize the costs of environmental degradation, leading to fiscally and ecologically unsustainable outcomes. The "invisible costs" of noise from Growler aircraft, estimated at millions per year in health impacts and depressed property values, are one example. Similarly, the long-term costs of stormwater runoff from conventional development—impacting shellfish beds,

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reducing offshore biodiversity, and requiring costly infrastructure—are rarely factored in.

- **Request:** Integrate True Cost Accounting into the Economic Development framework and capital planning.
 - **We recommend a pilot project in the 2026-2027 Capital Facilities Plan** to apply these principles to a selected infrastructure project, modeling its full financial and ecological lifecycle costs to ensure public investments advance long-term resilience.

4. Commit to Funding an Ecosystem Services Valuation Study

The Draft lacks a mechanism to economically value our natural capital, which undermines robust reform of the Public Benefit Rating System (PBRs) and the management of conservation lands. Without this data, the County cannot accurately assess the economic benefits of preservation versus development.

- **Request:** Include a specific goal and commitment to fund an economic valuation of the ecosystem services provided by County-owned and conserved lands (e.g., carbon sequestration, water filtration, flood mitigation). The findings are essential to guide PBRs reform, manage timberlands, and prioritize Conservation Futures acquisitions.
 - We were assured by Commissioner Johnson that she had been told this would appear in the Economic Development Element.

Opportunities for Policy Refinement & New Action

The table on the following page identifies specific areas where the Draft can be strengthened to reflect that healthy ecosystems are the foundation of a healthy economy:

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Goal / Policy	Identified Shortfall	Proposed Remedy / Opportunity
Goal 1 (Resilient Economy)	Lacks a definition of "prosperity" beyond financial growth.	Redefine prosperity to include community health, equity, and ecosystem flourishing, aligning with GMA goals. The draft strikes a commendable goal to increase locally based non-military jobs— please reinstate the original Goal 1.1 , making it ED 1.5 in the new draft.
ED 4.1 (Natural Assets)	Treats natural assets primarily as "drivers for tourism."	Acknowledge habitat and ecosystem functions (clean air, water, climate resilience) as foundational public infrastructure essential for all economic activity.
New Policy Needed	No mechanism for evidence-based PBRS reform or natural capital investment.	Adopt Policy ED 5.5: By Q4 2026, fund and complete an economic valuation of ecosystem services. Use findings to guide PBRS updates and prioritize natural climate resilience.

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Addressing Equity and Climate Justice

A truly resilient economy is also just. The communities most vulnerable to economic leakage are often also most vulnerable to climate impacts. Prioritizing local ownership, living-wage jobs in the green economy, and investments in natural infrastructure that protect all communities will ensure that Island County's economic development reduces disparities and builds universal resilience.

Conclusion

Island County has the opportunity to lead by adopting an economic development model that measures what matters. By valuing its natural capital, internalizing true costs, and fostering a circular local economy, the 2025 Plan can transition from managing growth to building enduring, equitable prosperity in the face of climate change. This is where the county's commitments to Equity, Health, and Climate Resilience can be made manifest.

Thank you for your consideration of these comments.