

## Sophia Cassam

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**From:** Bill Bangs <wjbangs@gmail.com>  
**Sent:** Sunday, July 10, 2022 1:34 PM  
**To:** Comp Plan Update  
**Subject:** Comprehensive Plan Update

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According to WAC 365-196-500(3), "The development regulations must be internally consistent and be consistent with and implement the comprehensive plan." It appears that the San Juan County 2036 Comprehensive Plan Update does not fully address compliance with this requirement and that the existing development regulations are both inconsistent with the update and incomplete in their implementation. The County appears to have chosen to rectify this problem by addressing new and updated development regulations only after the Comprehensive Plan Update is approved. This renders a complete evaluation of the compliance of the Comprehensive Plan Update logistically impossible. For example, should certain development regulations logically required to implement the Comprehensive Plan Update never be formulated and approved then the previously approved plan is rendered impotent and there is no statutory basis for subsequent review by the public.

However, according to WAC 365-196-650 (see below), **each county planning under the Growth Management Act should develop a strategy for implementing its comprehensive plan.** This strategy should be in writing and available to the public. The strategy should include a list of all regulations identified as development regulations for implementing the comprehensive plan and a schedule for the adoption or amendment of the development regulations identified. This strategy should be available for review prior to the conclusion of the public participation process in the creation or amendment of a comprehensive plan in order to render that participation meaningful.

**When will the strategy for implementing the 2036 Comprehensive Plan Update be documented and available to the public?**

Sincerely,

Bill Bangs (Orcas Island)

William J. Bangs, II  
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## **WAC 365-196-650 (attached for reference)**

### **Implementation strategy.**

Each county or city planning under the act should develop a strategy for implementing its comprehensive plan. The strategy should describe the regulatory and nonregulatory measures (including actions for acquiring and spending money) to be used to implement the comprehensive plan. The strategy should identify each of the development regulations needed.

(1) Selection. In determining the specific regulations to be adopted, counties and cities may select from a wide variety of types of controls. The strategy should include consideration of:

(a) The choice of substantive requirements, such as the delineation of use zones; general development limitations concerning lot size, setbacks, bulk, height, density; provisions for environmental protection; urban design guidelines and design review criteria; specific requirements for affordable housing, landscaping, parking; levels of service, concurrency regulations and other measures relating to public facilities.

(b) The means of applying the substantive requirements, such as methods of prior approval through permits, licenses, franchises, or contracts.  
(c) The processes to be used in applying the substantive requirements, such as permit application procedures, hearing procedures, approval deadlines, and appeals.

(d) The methods of enforcement, such as inspections, reporting requirements, bonds, permit revocation, civil penalties, and abatement.

**(2) Identification. The strategy should include a list of all regulations identified as development regulations for implementing the comprehensive plan. Some of these regulations may already be in existence and consistent with the plan. Others may be in existence, but require amendment. Others will need to be written.**

**(3) Adoption schedule. The strategy should include a schedule for the adoption or amendment of the development regulations identified. Individual regulations or amendments may be adopted at different times. However, all of the regulations identified should be adopted by the applicable final deadline for adoption of development regulations.**

**(4) The implementation strategy for each jurisdiction should be in writing and available to the public.** A copy should be provided to the department. Completion of adoption of all regulations identified in the strategy will be construed by the department as completion of the task of adopting development regulations for the purposes of deadlines under the statute.