

## Sophia Cassam

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**From:** Timothy Blanchard <tim@blanchardmanning.com>  
**Sent:** Thursday, July 14, 2022 11:13 PM  
**To:** Comp Plan Update  
**Subject:** Comments for Planning Commission Hearing July 15, 2022  
**Attachments:** TPB Comments for PC July 15.pdf

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Please provide the attached to the Planning Commission. Thank you.

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July 14, 2022

Re: Comments regarding the 2036 Comprehensive Plan Update -- Comprehensive Plan text, excluding Official Maps,

Dear Planning Commission Members:

Please consider these comments for your hearing of July 15, 2022, and include them in the Administrative Record for this hearing and the Update.

#### **OBJECTIONS FOR THE RECORD**

- I object for the record to what amounts to a bait and switch limiting the public's opportunity to comment effectively on the Comprehensive Plan update – limiting public comment on the entire plan to 3 minutes by conducting a single hearing on the entire Comprehensive Plan rather than conducting a hearing on each element, as originally contemplated. Unlike the original public participation plan, the three minutes that will be allowed regarding these complex issues and interactions is patently insufficient to satisfy the applicable GMA requirements.<sup>1</sup>
- I also object for the record about DCD's decision to deny the workshops requested by the Planning Commission on (1) impediments to business provided or facilitated worker housing and (2) specific non-road-right-of-way bicycle/pedestrian path routes for more focused feasibility review.

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<sup>1</sup> It was not possible for members to comment effectively on these elements previously, because the proposed provisions could not be evaluated in relation to other elements (*i.e.*, as part of a comprehensive plan), which is particularly problematic in light of reorganization and relocation of some policies within the plan. One could not have challenged certain policy or drafting decisions previously because the proposals were not final and, in some cases, had not yet been developed. The effect of proposals for some Comp Plan Elements is dependent on the effect of provisions in other Elements, and interaction among provisions in multiple elements. Indeed, all prior Planning Commission discussions regarding these elements were characterized as introductory briefings or preliminary discussions, so comments at that time would not have represented comments on the actual Planning Commission proposals.

Unfortunately, we are now back to following the traditional San Juan County approach to comprehensive planning – delay, delay, delay-then-rush-to-complete-the-minimum-required-update rather than enabling the Planning Commission to work toward solving the significant planning issues facing our community. Indeed, the most important planning issues facing the County – ***assuring available housing for needed workers, promoting development of pedestrian and bicycle paths outside of road right-of-ways, and protecting rural character throughout the County*** -- have not received adequate attention or been suppressed, notwithstanding keen interest on the part of the Planning Commission to do this important work, in the update process to date.

## **INADEQUATE PROTECTION FOR THE RURAL CHARACTER OF SAN JUAN COUNTY**

It is important to understand that, **we, as a County, are required to plan for projected growth, but we do not have to encourage it.**

The Comprehensive Plan should enable development (including public works) necessary for the community, such as housing for workers and adequate well-placed zones allowing island businesses. We should not, however, adopt planning policies that encourage people who do not really want a rural lifestyle to move here. That is the opposite of protecting rural character.

Protecting rural character, of course, requires more than limiting densities in rural zones. Indeed, rural densities have much less impact on rural character than the character of roads and other public works which affect how people perceive and relate to where they live. Although reasonable minds can certainly differ about what one considers rural or rural character, fundamentally, rural is what remains outside of urbanized and suburbanized areas. After all, everything was rural prior to urbanization or suburbanization. Accordingly, protecting rural character means avoiding road projects and governmental policies that result in, or promote, urbanization or suburbanization or our rural county.<sup>2</sup>

To those who say we need to make it easier to live here, I say part of rural life is that sometimes, indeed, sometimes quite inconveniently, you just have to accept that you can't always get or do anything you want when you want. This is a small sacrifice for the opportunity to enjoy the pleasures of this beautiful place and not living in a city or suburb, which brought most of us here in the first place. That does not mean we cannot work on appropriate local solutions to make things better. It does mean that we, as islanders, need timely and effective mechanisms to tell the County that a particular project, as proposed -- or as required as a

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<sup>2</sup> I do not believe that individual landowners should be constrained in their design choices. Freedom to choose and the resulting eclectic array of home styles is part of the serendipity people love about rural areas. Using urban standards for roads and related public works – because that approach is preapproved by grant funders or how they “do it on the mainland” — is inconsistent with protecting rural character and our Vision Statement. I believe that we must establish very conscious decision-making procedures to avoid allowing miniature cityscapes, unnecessarily wide thorough-fares, traffic control lights, divided medians, left turn lanes, glaring overhead lights and other urban streetscape contrivances to replace our small-town spaces and country roads.

condition of grants or other funding, is too damaging to the character of our community and that we do not want that kind of “improvement” to be made.

If we are serious about protecting the rural character of San Juan County, as required by the GMA and our Vision Statement, the Comprehensive Plan needs to include concrete policies to help stem the urbanizing/suburbanizing of our rural country roads<sup>3</sup> and to keep that responsibility front and center in County decision-making.

Understanding the difficulty of incorporating the concepts of the Scenic Roads Manual into the County’s road standards and recognizing that it may be impossible for the road standards to capture all of the appropriate nuances for these considerations. I recommend a different approach to protecting rural character and promoting the development of appropriate local strategies for enabling individual islanders to travel safely and efficiently within the County using multiple modes of transportation. I recommend establishing a much more robust procedure to assure that public comment regarding proposed County road projects empowers islanders to participate effectively in transportation planning consistent with rural character, safety, and efficiency. This should help us avoid missing opportunities to develop sound local solutions and escape the application of cookie-cutter road standards, which frequently are anathema to the fundamental concepts reflected in the Scenic Roads Manual and our Vision Statement.

More specifically, I recommend adding a new Policy 2 to Transportation Element 6.2.B **Transportation Goals and Financing** (Page 11 of 38)<sup>4</sup> as follows:

***For every proposed County road and transportation project the Public Works Department shall prepare for public review as early as possible in the planning, in each 6-year TIP, and prior to any grant (or other funding) application or final decision regarding a project, a report that clearly:***

- 1. Identifies the specific demonstrated local public need (i.e., the specific problem(s) to be solved or public purposes to be advanced) by the proposed project;***

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<sup>3</sup> It has been suggested that the GMA requirement to protect rural character does not require or authorize regulation within Urban Growth Areas or designated Resource Lands. However, the GMA requirement to protect the rural character of our rural lands, must include regulations affecting County projects in UGAs and Resource Lands because urbanization anywhere in the County affects the rural character of the rest of the County. Indeed, for many, if not most, purposes under state and Federal law **the entire County is considered rural**. Therefore, I submit that protecting the rural character of rural lands requires considering and addressing the impact of policies and projects for UGAs and designated Resource Lands.

<sup>4</sup> These mark-ups are based upon the Word version of the Draft Transportation Element retrieved on July 14, 2022, from <https://www.sanjuanco.com/1753/Comp-Plan-Update-Current-Drafts>.

2. ***Explains how the project is consistent with protecting rural character (as contemplated in the Scenic Roads Manual), including any impediments to addressing the demonstrated local public need with less disruption of rural character; and***
  
3. ***Identifies, using accurate drawings of other effective methods, each mature tree, rock outcrop, boulder, or other significant natural or cultural feature that would be removed or materially altered by the proposed project so that the public can have a complete understanding regarding the impacts of the proposed project in time to comment effectively on the proposal.***

I also recommend the following additional revisions to the draft Transportation Element:

- Revise Transportation Element 6.2.A **General Goals**, Paragraph 5 (Page 8 of 38) to protect rural character by avoiding wider pavement in right-of-ways and provide safer, more enjoyable and potentially more efficient travel by cyclists and pedestrians in San Juan County, as follows:
  5. Prioritize the development of **pedestrian and bike trails** lanes **separate from road right-of-ways** from the ferry terminals to the major points of interest and services on each island, to ensure connectivity utilizing safe designs for **separation of motor vehicles from pedestrians and bicycles**. ~~and bike separation of.~~
  
- Revise Transportation Element 6.5.A **Policies for Road Classification, Right-of-Way, Design and Construction** Policy 14 (Page 29 of 38) to assure internal consistency, as follows
  14. In addition to **[new] Policy 2 to Transportation Element 6.2.B (page 11 of 38)**, include a thorough public participation program and interdisciplinary teams advisory to the County Engineer, as early as practicable in the planning and design phases of major projects. Adjacent property owners and other affected persons should be represented on interdisciplinary teams.
  
- In Transportation Element 6.5.C **Policies for Land Transportation Level of Service (LOS)** (Page 31 of 38) to revise Policies 4 and 5 to add at the end of each:
 

***. . . To protect rural character, such alternatives shall not include traffic lights, mechanical control devices, or flashing signs.***

Thank you for considering these comments and for your service on the Planning Commission.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tim Blanchard". The signature is written in a cursive, flowing style.

Tim Blanchard  
Orcas Island