

Friends **Protect this Place**

April 17, 2025

To: Sophia Cassam, Planner III; Planning Commissioners; County Council

Delivered via email to: sophiac@sanjuanco.com

From: Friends of the San Juans

Re: Comments for Planning Commission review of the San Juan County Comprehensive Plan Update on the Introduction and Transportation Element.

Dear Planning Commission and County Council,

Friends of the San Juans (“Friends”) respectfully submits the comments below to express appreciation and offer recommendations to improve the San Juan County Comprehensive Plan Update Introduction and Transportation Element. As an initial matter, Friends believe that the 2045 Vision closely and accurately tracks the vision that residents of our islands share for our home, from the robust desire to protect the natural ecological heritage to the goals for maintaining a self-sufficient, diverse, vibrant rural community. We strongly encourage the County Council to make every effort to translate these lofty yet attainable principles into meaningful direction on the ground through development regulations that implement them.

With regard to the Transportation Element, we offer the following feedback:

- **Complete Streets (General Goal 1 and page 21 of Appendix 6).** While the Complete Streets policies offer a step toward implementing actual complete streets, the changes below should be made to better align the policies with a complete streets approach and to improve the accuracy of the Appendix’s characterization of the County’s current Complete Streets framework. Deletions have been marked by strike-through, and additions with underline.
 - **Policy 1.b.** ~~Improve~~ Create safety travel corridors for all users by designing and constructing them to reduce, and if possible eliminate, conflicts between the different types of users.
 - **New Policy 1.e.** Design and construct paths for active transportation that are separated from roads wherever possible, achieved by eliminating shoulders for the road surface if necessary to achieve this within the road right-of-way.

Friends **Protect this Place**

- **New Policy 1.f.** Annually monitor the length of new complete streets corridors that has been built in the prior 12 months.
- **Appendix 6, at 21 and 38.** Delete the statements that:
 - “In 2018, the County adopted the Complete Streets Program Ordinance to ensure that future planning, design, and construction of motorized and non-motorized transportation facilities incorporate Complete Streets principles.”
 - “In addition, the 2018 Complete Streets Program Ordinance states that all projects in the County’s six-year Transportation Improvement Program must incorporate complete streets where feasible....”

The Ordinance does not ensure the incorporation of Complete Streets principles in transportation facilities or the Transportation Improvement Plan where feasible. A Friends representative participated in the 2018 effort to adopt a Complete Streets Policy for San Juan County and while we agree that the above statements captures the initial goal, the language that was ultimately adopted is more aspirational and does not require the implementation of Complete Streets principles. Instead, the County Engineer must simply "evaluate the application of complete streets principles into the planned design" of projects considered for inclusion in the TIP, and he or she has the discretion to determine whether it is "appropriate" to "recommend complete streets projects" in preparing the TIP. SJCC 12.03.030.D.1, D.2. Although the Complete Streets regulations do not currently require complete streets, we urge the County Council to adopt revisions to do so and would be pleased to provide sample language toward that end.

- **Resiliency, Goal 3.** Friends supports and appreciates the Resiliency Goal (3) and associated policies.
- **Active Transportation, Goal 4.** Friends supports the Active Transportation policies, and recommends revising the new Goal 4 so that it would read:
 - Establish ~~an~~ a walking, rolling, and equestrian network on each ferry-served island with public transportation corridors so that residents and visitors of all ages can safely and comfortably connect from the ferry and from their homes to points of interests and necessary services.

Friends **Protect this Place**

- **Connecting ferries and transit, Policy 6.4.B.6.c.** Friends representatives have a significant amount of experience connecting to the mainland transit system by ferry and Skagit Transit, and we are sympathetic to the need for transit agencies to be able to provide consistent, predictable schedules. Toward that end, we recommend revision of this policy as follows:
 - c. Encourage WSF to coordinate ferry arrivals at terminals so that they are timed to connect with transit schedules serving those terminals; Solicit resources to improve transit schedules and connections at ferry terminals and coordinate with Skagit Transit and other transit providers;
- **Level of Service (LOS).** Friends supports the addition of a Level of Service metric for pedestrian and bicycle access along transportation corridors per the Growth Management Act. We recommend that the following adjustments be made to more accurately reflect the LOS that would be experienced by pedestrians and cyclists:
 - **Policy 6.5.C.8. Pedestrian.** The orange/medium LOS apply only where a 5-foot-wide shoulder exists on **both** sides of a road. The current proposal would apply this standard when only one side of a road has a 5-foot-wide shoulder. But with 45mph speed limits and frequent 50-60mph actual speeds, pedestrians should be able to walk against traffic in both directions before the County considers the LOS medium.
 - **Policy 6.5.C.8. Bicycle.** As with the pedestrian LOS system, the orange/medium currently would apply for a 5-foot-wide shoulder on just one side of the road, but should apply only where a 5-foot-wide shoulder exists on **both** sides of a road. It's not reasonable for a medium LOS to describe situations where a cyclist would travel next to automobiles traveling at 50-60mph with only a narrow or nonexistent shoulder.
- **Corrections. The Appendix makes two assertions that do not appear to be supported by facts on the ground and so should be corrected:**
 - **Appendix 6, at page 39 of 42 (Challenges and Solutions).** This section erroneously states that Beaverton Valley Road has a shoulder equal to or greater than 4 feet. The shoulders on most of Beaverton Valley Road are far narrower than 4 feet, so the reference to that road should be deleted at the bottom of page 39.
 - **Feasibility of separated routes, Appendix 6, at 40.** The Appendix asserts that the County's 60-foot right-of-ways aren't wide enough to accommodate more

Friends **Protect this Place**

than 2 lanes and drainage elements, but this statement conflicts with transportation corridors along Mount Baker Road and Fisherman Bay Road that accommodate two traffic lanes, shoulders, ditches, vegetation, and 4-6 feet of separated path within 50 feet and 55 feet, respectively. The elimination of the 4-foot shoulders on either side of the roads would increase the amount of space available for separated paths.

- **Madrona Institute comments.** Friends supports each of the recommendations that the Madrona Institute offered in their April 11, 2025 comment letter: (1) promote the reduction of transportation-related greenhouse gases emitted for tourism; (2) create a Transportation Citizen Advisory Committee; and (3) pilot edge lane roads on secondary transportation corridors throughout the islands that experience infrequent traffic.

We look forward to working with you to create a Transportation Element that reflects the diverse needs of our island community.

Sincerely,



Eva Schulte

Executive Director, Friends of the San Juans

Eva@sanjuans.org

360-378-3991