

Whidbey Environmental Action Network  
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## **Feedback on the Draft Transportation Element: Thank You for Shifting Toward Multimodal Planning and Climate Resilience**

*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 its clear pivot toward multimodal planning and climate resilience in the 2025 draft Transportation Element. This shift directly responds to state mandates (HB 1181, RCW 47.04.035) and critical community priorities. Specific strengths include:

- The proactive commitment to **fish barrier removal** (Policy 4.6).
- The foundational adoption of **Multimodal Level of Service (MMLOS) standards**, correctly prioritizing walking, biking, and transit (Policy 1.4).
- **Strengthened environmental protections**, such as expanding Policy 4.4 to protect wetlands adjacent to roadways.
- The establishment of **Climate Resilience** as a formal goal (Goal 5), committing to a system that can recover from extreme weather.

### **Critical Recommendations for Technical Accuracy & Rural Implementation**

To ensure these excellent goals are grounded in the physical and fiscal realities of Island County, we offer the following recommendations for refinement.

#### **1. Adapt State Standards to Preserve Rural Character & Environment**

- **Employ Context-Sensitive Complete Streets:** Mandated "Complete Streets" designs must be adapted site-specifically. Urban features (e.g., curb cuts,

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sidewalks at isolated intersections) are often impractical and out of character in rural areas. Standards must allow for rural-appropriate solutions.

- **Define Trail Infrastructure Precisely:** The plan should distinguish between many types of trails, which vary wildly (from 10-12 foot wide paved multi-use pathways to narrower, unpaved natural surface trails and many types in between). This clarity sets accurate public expectations and guides appropriate, lower-impact construction.
- **Mandate Proactive Critical Area Protection:** Shoulder widening and pathway projects must not degrade wetlands or other critical areas. We recommend:
  - Amending shoulder widening criteria to **include explicit, non-negotiable protections** for adjacent critical areas.
  - **Requiring a Critical Area Assessment** for all proposed shoulder widening and pathway projects, not just those triggered by SEPA.

## 2. Improve Data, Maps, and Objective Standards

- **Enhance Ferry Accessibility Analysis:** While encouraging walk-on passengers (Policy 5.5) is positive, the County should evaluate whether the physical design of facilities (e.g., ramp lengths) inadvertently discourages use by elderly, disabled, or mobility-impaired residents.
- **Base Decisions on Objective Metrics:** Level of Service (LOS) and mitigation decisions should be governed by clear, objective standards to avoid the appearance of arbitrary "case-by-case" discretion.
- **Provide Legible, Accurate Maps:** The current maps (e.g., pp. 51, 69) are often too coarse and lack detail. The final plan must include:
  - **High-resolution**, legible maps for public evaluation.
  - Transit maps that accurately reflect **current service routes**, not outdated information.

## 3. Prioritize Safety, Necessity, and Strategic Use of Funds

- **Institute a Public "Necessity Assessment":** Given declining fuel tax revenues, costly reconfigurations (e.g., Burley/Swede Hill, Heggenes/Orr) must be justified through a transparent, public process before funding is allocated. This ensures limited funds are directed to projects with demonstrable need.
- **Address Immediate Safety Hazards with Commitment:** The plan should move beyond "considering" upgrades to a firm commitment to install ADA-compliant

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lighting and crosswalks at high-speed road bus stops where documented safety risks and past fatalities exist.

- **Avoid Piecemeal, Developer-Funded Fixes:** Using SEPA mitigation (p. 93) to fund road improvements is legally tenuous and leads to uncoordinated infrastructure. We strongly recommend:
  - Relying on established, **equitable impact fee programs** for developer contributions.
  - Addressing cumulative traffic impacts through the **comprehensive plan** itself, not ad hoc project negotiations.

#### **4. Demonstrate Fiscal Responsibility Before Pursuing New Revenue**

The funding discussion prematurely focuses on new taxes and fees. The County must first build public trust by:

1. **Prioritizing safety and maintenance** over speculative capacity expansions.
2. Publishing a transparent, objective **project prioritization framework** to demonstrate that all proposed capital projects are essential.

#### **Conclusion**

By refining this draft to incorporate rural-appropriate engineering, precise data, proactive environmental protection, and a transparent prioritization of necessary projects, Island County can transform high-level goals into an effective, fundable, and resilient transportation strategy. We appreciate your work and the opportunity to provide these constructive comments.