

Adam Zack

From: Glen Bruels <glen@bruels.com>
Sent: Thursday, August 24, 2017 1:04 PM
To: Ryan Page
Subject: Comments on Comprehensive Plan Appendix 5 Housing Needs Assessment August, 9 2017 Preliminary Draft

Hi Ryan,

Attached are my comments on the subject draft. I will begin with some specific comments and then suggest some additions that should be a part of the document.

Specific Comments

Section 5.3.2 Income and Economic Structure. I think you miss an opportunity here. In Figure 5-2 you depict the Per Capita Personal Income by County which shows San Juan County as second highest in the state. While you go on to point out that Earned Income as a share of San Juan County's personal income has declined, you don't do a similar figure to Figure 5-2 to benchmark San Juan County against the other counties in the state. I believe we would be near or at the bottom. That is a key component of housing affordability — while we have some of the highest median home price values in the state, our Earned Income is one of the lowest. That point needs to be hammered home and not just buried as a metric in the Housing Affordability Index.

Section 5.3.3 Employment. The numbers and trends in Table 5-5 seem inconsistent with the argument that we are shifting more towards tourism and that more, older, and more affluent are moving to the County (e.g., while the percentage of service occupations has gone by 3.1%, the natural resources, construction et al have declined nearly as much). I think a better discussion of what falls into the Management et al category is also warranted. What's in there? Saying that this category represents a third of our workforce and is growing seems inconsistent with the point that we are increasingly becoming a tourist economy.

Page 17, Line 16. “affected” not “effected”.

Section 5.4.1 Vacant Units, Page 17. You attempt to do an illustration of the disparity within the county regarding the percentage of rental units (with Lopez the lowest), but the assessment you make relates to the consistency of vacant units across the islands. Perhaps you should either drop the point about Lopez's lower rental rate or make a hypothesis of why that might be (e.g. fewer tourist activity options?). Anyway, you should try to be consistent.

Section 5.6 Land Availability. I recognize that this section is not yet available, but I would suggest some analysis that should be done, especially since we are trying to benchmark our county against the others in the state. From my readings, it appears that San Juan County has one of the largest percentages of protected open space as a percentage of county area. That is not surprising given the governmental (federal, state, county) and multiple preservation organizations' holdings. On the one hand, that is something that we should all be proud of as stewards of some of the most beautiful land in the US. And it probably has a direct correlation with the increase of second, vacation, and retirement home growth in the county. But it also comes at a price. Reducing the amount of available land for development drives the prices of remaining land up. And this is not just coastline, but also interior portions of our islands. We make a conscious decision to preserve our land, but we should include this element into the overall housing needs and affordability equation. By the way, I came

across an interesting thesis submission on local land preservation that you or the groups may want to look at (<http://cedar.wvu.edu/cgi/viewcontent.cgi?article=1016&context=wwuet>).

Table 5-13 San Juan County Low Income Housing Inventory. While you caveat the numbers for Homes for Islanders, recognizing “with or without resale restrictions,” I think you need to be more specific because a large percentage of those homes have no restrictions. Hence, while the people who perform the sweat equity properly get the benefit of that effort, most of the properties can be subsequently be sold at market rates, meaning there is no increase to affordable housing stocks.

Section 5.5.7 Housing Groups and Nonprofits. I think you need to explicitly state that San Juan County is only one of two counties in the state that does not have a Housing Authority. While Housing Authorities are struggling a bit these days, not having one keeps us from having a dedicated resource to deal with housing issues, deal with all levels of government on housing related issues and funds, be an interface with potential low cost housing developers and provide the ability to be a housing finance source (obviously in our case with the Washington State Housing Finance Commission and private investors). I believe we have been somewhat hamstrung in the actual creation of affordable housing by having depend solely on our nonprofits.

General Comments

There are currently no goals, policies, or objectives stated for the preservation, improvement, and development of housing. Right now this is a statement of “what is.” The danger in doing assessments such as this is that they are often seen as “admiring the problem.” Since this Housing Needs Assessment should ultimately lead to a range of alternatives to be examined, a consideration of what resources/capabilities to help work the problem should be included. Ideally, a SWOT (Strengths, Weaknesses, Opportunities, and Threats) should be done as part of the assessment. In this reading we have heard a lot about weaknesses and some threats, but little on strengths, and nothing on opportunities. Who are the stakeholders and what can they bring to the table related to policy/regulation, financing, outreach/education, partnerships, etc. This kind of data will be critical to conducting a successful analysis of alternatives.

I believe partnerships are going to be critical in addressing our housing needs. To date, there has been limited (and somewhat growing) collaboration between County and local governments and the non-profits who are doing the affordable housing provision. What incentives (or removal of impediments) are available to help them in their work? Also, are there other potential partners who could contribute to the problem resolution? Martha’s Vineyard, an island with many of the same challenges we are experiencing, has enabled good working partnerships between their Land Bank(s) and the affordable housing groups on the island (<http://www.mvlandbank.com/documents/affordablehousing11-2016.pdf>). I would err in the direction of casting a wide net in terms of who your stakeholders are (including potential partners you may not have considered). When we did the strategic plan for the Home Trust in 2011, we interviewed over 60 people and the insights were surprising and insightful.

Anyway, thanks for the opportunity to comment. I wish you luck as you continue down the path.

Glen Bruels