



Friends *of the* San Juans

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29 March 2022

San Juan County Council, Planning Commissioners, and staff

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Re: Friends of the San Juans comments on housing and the Comp Plan Housing Element

Dear Members of the San Juan County Council, Planning Commissioners, and staff:

Thank you for your service and extensive work on the update process for San Juan County's Comprehensive Plan, and for considering these comments. As the Planning Commission begins to wrap up its work on the Comp Plan update process, the Housing Element has come up as a focus of discussion. I am writing to summarize key housing policy considerations that Friends of the San Juans supports and believes are very important to our community. The patterns of how and where housing gets built are deeply connected to the health of both our human and natural communities. Housing affordability plays a central role in the livability and inclusiveness of our communities. Sprawling development diminishes our rural character, fragments native habitats, and increases carbon emissions. In accordance with Washington State's Growth Management Act, Friends believes that increased density in our villages and other Urban Growth Areas (UGAs) can, when planned thoughtfully, increase affordability, decrease sprawl, and protect our remaining natural habitats.

Friends supports pursuing the availability of sufficient long-term housing stock, including long-term rentals, to meet the needs of people of all income levels. **Focusing development in our UGAs is the most responsible means of accommodating growth in an environmentally thoughtful way, especially in a way that prepares our community for the impacts of the climate crisis.**¹ Concentrating growth in the UGAs allows for services to be offered more efficiently, thus conserving natural resources as much as possible. It cuts down on energy use, transportation costs, and much more, while protecting our forests and ag lands from development.

It's also worth re-emphasizing that development focused within the UGAs is the most fiscally responsible means of guiding growth. Keeping growth focused within UGAs saves taxpayer money. It

¹ The Vision Statement adopted by the County Council in 2018 specifically calls for the Comp Plan Update process to address climate change. The language adopted by the Council appropriately proclaims, "Our community sets an example with its response to climate change. We prepare to address the negative effects in advance before they become crises." *County Council Adopted Vision Amendments*, adopted by Resolution 27-2018. Friends believes that growth centered within the UGAs is the single greatest policy needed in the Comp Plan to satisfy this objective.

reduces the costs of providing public infrastructure and services, including roads, water and sewer services, and emergency services, to name just a few.

In addition to the many common-sense reasons why we should focus development in UGAs, **please keep in mind the legal requirements of the Growth Management Act (GMA)**, which has a clear mandate for the County’s adopted UGAs, “within which urban growth shall be encouraged and outside of which growth can occur only if it is not urban in nature.”²

It will also be important to complete buildout within the UGAs prior to expanding UGA boundaries. Expanding UGAs prior to buildout simply creates more sprawl, and it would violate the GMA.³ In guiding that buildout, Friends supports maximizing densities within the UGAs and incentivizing multi-family development projects.

Several observers have noted that adding housing stock in the UGAs is not as easy as it sounds, given construction constraints and financial challenges for development there. Friends supports the following approaches to addressing the housing crisis in San Juan County:

- As noted above, **densities in the UGAs should be maximized.**
- **County codes that address parking and building design in the UGAs may need to be changed** so that they pose less of a hindrance to the development of multi-family residences in the UGAs; *more data are needed on which actions will have the intended result*, and we hope the County will work with the community and developers to collect these data.
- Moving forward, **the construction of new, single-family residences within the UGAs should be strongly discouraged.** Many rural communities around the country have already taken this step, or are considering forbidding single-family development in their UGAs entirely.
- **The County should explore ways to strongly incentivize the conversion of existing housing stock (including currently “vacant” housing and private apartment buildings in UGAs, for instance), County-wide, to provide affordable and mixed-income long-term rentals.**⁴
- Allowing the free market economy to “work its magic” over the decades is the single greatest cause of San Juan County’s current housing crisis. Therefore, to counteract these market forces, **mechanisms for additional public funding must be created to support the development of new housing stock in the UGAs (including long-term rentals) that is affordable to low- and middle-income residents and families.** Friends applauds the heroic work of the various nonprofit housing organizations in San Juan County, and it’s clear that *additional*, County-supported efforts are urgently needed, along with appropriate funding.

² Growth Management Act, RCW 36.70A.110.

³ *Thurston County v. W. Wash. Growth Management*, 190 P.3d 38, 49, 164 Wn.2d 329 (Supreme Court of Wash. 2008). See also RCW 36.70A.110 and RCW 36.70A.115, which limit the size of UGAs.

⁴ This includes strong caps on the use of “vacant” properties as short-term or vacation rentals. Please refer to Friends’ prior specific comments on the Vacation Rental Code Amendment, submitted by Kyle Loring on September 15, 2021. Available on the DCD website for the Vacation Rental Code Amendment at <https://www.sanjuanco.com/1826/2021-Vacation-Rental-Code-Amendment>

- **The County should address illegal development County-wide**, as it is often the illegal structures that damage habitats most or otherwise pose the greatest environmental risk. Code enforcement should be undertaken consistently and needs to be based on regular, proactive observations of our lands and shorelines by County staff. Enforcement pursued solely in response to complaints has proven to be ineffective and insufficient, and also it can be detrimental to our sense of community by pitting neighbor against neighbor.
- In order to reduce long-term costs for owners, minimize impact on habitats and natural resources, and advance climate action, **all new development should adhere to “best practices” with respect to environmental stewardship.**

Friends would also like to remind the Planning Commission and Council members that **the unlimited construction of detached Accessory Dwelling Units (ADUs) across the county is not a legally viable means of addressing housing needs, nor one that would provide significant housing solutions.** The Growth Management Hearings Board previously addressed ADUs in San Juan County in 2003⁵ and 2007.⁶ Please see our separate letter submitted today on that topic.

Again, thank you for considering these comments. I sincerely hope that they contribute to productive conversations on these important issues, and we look forward to working with you to develop meaningful housing solutions appropriate for our community.

Respectfully,



R. Brent Lyles, Executive Director

⁵ Friends Of The San Juans, Bahrych, and Symons, Et Al., V. San Juan County, before the Western Washington Growth Management Hearings Board, case No. 03-2-0003c, Corrected Final Decision And Order and Compliance Order, dated April 17, 2003.

⁶ Friends Of The San Juans, Bahrych, and Symons, Et Al., V. San Juan County, before the Western Washington Growth Management Hearings Board, case No. 06-2-0024c, Final Decision And Order, dated February 12, 2007.