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The San Juan County 2036 Comprehensive Plan Updates fails to fully comply with the requirements of RCW 36.70A (the "GMA"), is internally inconsistent, and contains substantial errors. Ten significant issues are listed below. Some of the issues relate to GMA sections updated in April 2021 by H.B. 1220 – the pre-1220 language is used in part (a) and the post-1220 language is used in part (b) of the issue description.

1. The San Juan County 2036 Comprehensive Plan Update fails to comply with the requirements of RCW 36.70A.020(1) because it does not encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.
2. The San Juan County 2036 Comprehensive Plan Update fails to comply with the requirements of RCW 36.70A.020(2) because it does not reduce the inappropriate conversion of undeveloped land into sprawling, low-density development.
3. a. The San Juan County 2036 Comprehensive Plan Update fails to comply with the requirements of RCW 36.70A.020(4) because it does not encourage the availability of affordable housing to all economic segments of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.

b. The San Juan County 2036 Comprehensive Plan Update fails to comply with the requirements of RCW 36.70A.020(4) because it does not plan for and accommodate housing affordable to all economic segments of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.
4. The San Juan County 2036 Comprehensive Plan Update fails to comply with the requirements of RCW 36.70A.070(2)(a) because the Housing Element does not include an *accurate and consistent* inventory and analysis of existing and projected housing needs that identifies the number of housing units necessary to manage projected growth.
5. The San Juan County 2036 Comprehensive Plan Update fails to comply with the requirements of RCW 36.70A.070(2)(b) because the Housing Element does not include a complete and consistent statement of goals, policies, objectives, and mandatory provisions for the preservation, improvement, and development of housing including single family residences.
6. a. The San Juan County 2036 Comprehensive Plan Update fails to comply with the requirements of RCW 36.70A.070(2)(c) because the Housing Element fails to identify sufficient land for housing, including, but not

limited to, government-assisted housing, housing for low-income families, manufactured housing, multifamily housing, and group homes and foster care facilities.

b. The San Juan County 2036 Comprehensive Plan Update fails to comply with the requirements of RCW 36.70A.070(2)(c) because the Housing Element fails to identify sufficient capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, permanent supportive housing, and within an urban growth area boundary, consideration of duplexes, triplexes, and townhomes.

7. a. The San Juan County 2036 Comprehensive Plan Update fails to comply with the requirements of RCW 36.70A.070(2)(d) because the Housing Element fails to make adequate provisions for existing and projected needs of all economic segments of the community.
b. The San Juan County 2036 Comprehensive Plan Update fails to comply with the requirements of RCW 36.70A.070(2)(d) because the Housing Element fails to make adequate provisions for existing and projected needs of all economic segments of the community, including: (i) Incorporating consideration for low, very low, extremely low, and moderate-income households; (ii) Documenting programs and actions needed to achieve housing availability including gaps in local funding, barriers such as development regulations, and other limitations; (iv) Consideration of the role of accessory dwelling units in meeting housing needs.
8. The San Juan County 2036 Comprehensive Plan Update fails to comply with the requirements of RCW 36.70A.070(5)(c) because the Land Use and Rural Element (Section B Element 2) does not include measures governing rural development that protect the rural character of the area by (i) Containing or otherwise controlling rural development; (ii) Assuring visual compatibility of rural development with the surrounding rural area; (iii) Reducing the inappropriate conversion of undeveloped land into sprawling, low-density development in the rural area.
9. The San Juan County 2036 Comprehensive Plan Update fails to comply with the requirements of RCW 36.70A.110(2) because the Land Capacity Analysis does not include areas and densities sufficient to permit the urban growth that is projected to occur in the county for the succeeding twenty year period. The Land Capacity Analysis is erroneous, flawed, fails to follow Department of Commerce guidance, miscalculates the market factor by ignoring local circumstances, and grossly under-represents nonresidential uses.
10. The San Juan County 2036 Comprehensive Plan Update fails to comply with the requirements of RCW 36.70A.115 because the Plan Update, taken collectively with its Land Capacity Analysis and Housing Needs Analysis, does not provide sufficient capacity of land suitable for development within the County jurisdictions to accommodate the allocated housing growth in a manner consistent with projected residential and non-residential growth.

Respectfully submitted,

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