

Friends *of the* San Juans

February 20, 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 Housing, Capital Facilities, Utilities, and Economic Development Elements.

Dear Planning Commission and County Council,

Friends of the San Juans (“Friends”) appreciate the significant efforts that County staff and consultants have made to upgrade the County’s Comprehensive Plan and offer the following public comments to address the draft 2025 Comprehensive Plan Update (“Update”) elements that were made available on February 7th.

Housing Element

- **Temporary Housing.** Friends appreciate that the County recognizes that a substantially higher portion of the county’s housing is dedicated to “seasonal, recreational, or occasional” than across the state – 37.5% vs. 7.4%, and that this removes thousands of homes from year-round residential use.
- Friends also appreciate the County’s statement that there “should remain a focus to maintain limits on vacation rentals, and to introduce and strengthen County policies and programs that support permanently occupied housing within County UGAs (Urban Growth Areas) where services and jobs are most plentiful.” *To add more weight to this approach, we recommend that the County promote a long-term reduction in the number of vacation rental permits as existing permits fall into disuse and we also recommend that the County identify in this Update some of the policies, programs, and incentives that would support permanently affordable housing.*
- **Utilization of Eastsound UGA.** Friends appreciate that the Update would promote new, housing in the Eastsound UGA to address the existing and projected deficit of low-income housing there. *We recommend that the County prioritize steps to address this in the following order: (1) decreasing barriers to development in Eastsound, such as parking*

Friends *of the* San Juans

requirements, utility hookup fees, and site-by-site sidewalk construction; (2) increasing density within Eastsound with a focus on intentional design; and (3) as a last option, expanding the UGA, first by prioritizing the infill within the existing outer boundaries and then by adding land outside those boundaries.

- **Policy 1.5.** *Friends support the proposed revision to “Support the provision of tiny houses, tiny house communities, mobile home parks, and manufactured homes in UGAs, Activity Centers and rural residential clusters....”*
- **Policy 3.5.** *Friends support the proposed revision to “Prioritize weatherization, home maintenance programs, and efficiency upgrade programs for vulnerable communities including renters, lower income, elderly, and those with compromised health.”*
- **Policy 4.5.** *Friends support the proposal to “support” rather than “consider” tiny homes, with the important caveat that, as with Policy 1.5, this occur in UGAs, Activity Centers, and rural residential clusters.*
- **Policy 7.8.** *Friends support the proposal to remove barriers to ADU construction to the extent that this effort occurs for UGAs and Activity Centers and that it addresses utility needs like water, sewer, and stormwater. Removal of ADU limitations in other rural land use designations would conflict with the Growth Management Hearings Board's 2007 decision limiting detached ADUs in rural areas to prevent sprawl.*
- **New Policy H-7.9.** *Friends support this new policy to explore amendments to regulations that may be a barrier to housing production, like maximum building heights, minimum lot sizes, maximum densities, parking requirements, and lot coverage limits to the extent that this effort occurs for UGAs and Activity Centers. Special attention should be given to accessibility and mobility considerations related to these changes.*

Capital Facilities Element

- **Policy 9.5.** *Friends support the new sewage treatment policy to “create and implement a plan to identify septic systems vulnerable to sea level rise and increased flooding, and mitigate potential harm to freshwater and marine receiving waters.” Additionally, the county should examine current monitoring systems, which have proven inadequate and as a result had detrimental impacts on human health and marine and freshwater quality.*

Friends *of the* San Juans

Utility Element

- **Policy 6.7.** *Friends support the proposed policy language to “Work with utilities and the public to develop a specific solar siting policy for community solar projects, with a focus on streamlining approval on urban core/impervious areas rooftops, and already impacted developed land.” Friends also encourage the County to adopt language to protect agricultural resource lands and forest resource lands from utility development that would be incompatible with the long-term use of those lands for resource purposes.*

Economic Development Element.

- **Policy 3.3.** *Friends recommend against eliminating the preference for “quieter” ferries. Vessel noise contributes a significant risk factor to the continued existence of the Southern Resident Killer Whales, in addition to disrupting the marine environment generally, and Friends therefore recommend retaining the existing language.*
- **Friends supports the following goals and policies:**
 - The revision to Policy 1.2, to “encourage the retention and expansion of locally owned businesses and employment base, rather than fostering the attraction of mainland or nationally franchised businesses”;
 - New Policy 3.5 to “Ensure that the local economy fosters business opportunities associated with climate mitigation and adaptation, including local food production, energy supply and backup, and carbon-free transportation for residents and visitors. Support local businesses' efforts to bolster climate preparedness and continuity of operations”; and
 - New Goal 4 and associated policies to address the nexus between tourism and environmental and social assets.

Thank you for your consideration of these comments.

Sincerely,



Eva Schulte

Executive Director, Friends of the San Juans

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