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REPLACING COMMENTS OF JAN, 10, 2020

Ms. Sophia Cassam  
San Juan County Department  
of Community Development  
935 Rhone Street  
Friday Harbor, WA 98250

Comment on Preliminary Draft Section B,  
Housing Element, December 17, 2019

Dear Ms. Cassam,

The following are my comments and suggestions concerning the  
above draft:

Page 13, line 6, add the following paragraph:

**Accordingly, despite the theoretical adequacy of inventory of existing County housing, much of which is unoccupied for most of each year, coupled with the high cost of renting or purchasing housing, the large unmet need for affordable housing emphasizes the contrast between the vigor of the San Juan County real estate market and its inefficiency at meeting the needs of its residents. Some government oversight would be expected to follow in the normal course of events.**

Page 15, line 23, add the following policy to Goal 3:

**6. Impose an enforceable purchase or rental price cap for each housing unit improvement funded from federally tax exempt sources to prevent private financial gain from**

**increase in property value arising from that improvement alone, except in cases where private inurement is permitted.<sup>1</sup>**

Page 16, line 6, add the following policy to Goal 4:

**9. Except as provided by RCW 36.70A.070(5)(d)(iii), establish priority for creation, extension or increase of utility rural government services<sup>2</sup> outside urban growth or currently served water and sewer district service areas, to serve affordable housing in preference to housing serving a higher income or wealth markets so long as affordable housing is substantially insufficient.<sup>3</sup>**

Page 17, line 16, add the following policy to Goal 7:

**5. Give administrative priority to all housing project applications for development, construction, repair or rehabilitation of permanently affordable housing constituting \_\_%<sup>4</sup> or more in number of the housing units included in the application.**

Page 17, lines 40 et seq.

Comment concerning vacation rentals will follow public policy discussion.

Thank you,

William Appel

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<sup>1</sup> Such as when funded with certain federal funds. It is otherwise intended to discourage remarketing to a higher-priced market without recovery of the unamortized costs of improvement.

<sup>2</sup> As defined in RCW 36.70.030. This is intended to cover existing and future sewer and water districts, as San Juan County itself cannot directly render these services.

<sup>3</sup> This is in recognition that over the life of this Plan, water resources may become scarce by drawdown and the danger of pollution of remaining resources. The effect of this priority is to bar capital expenditures for creation, extension or increase contrary to this priority. RCW 36.70A.120

<sup>4</sup> I suggest 25% but a different number may prove more relevant, or a variable figure may be needed to apply to mixed (commercial/residential) projects.