




SAN JUAN COUNTY DEPARTMENT OF COMMUNITY DEVELOPMENT

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MEMO

MEMO DATE: August 6, 2021
TO: San Juan County Planning Commission
CC: Erika Shook, AICP, Department of Community Development Director
Ryan Ericson, Community Development Director, Town of Friday Harbor
FROM: Adam Zack, Planner II 
SUBJECT: San Juan County Comprehensive Plan
Element B.2 Land Use and Rural
Town of Friday Harbor Urban Growth Area (UGA)
MEETING DATES: August 20, 2021
ATTACHMENT: A. Town of Friday Harbor Comment Letter Dated May 17, 2021

PURPOSE

To get the Planning Commission preliminary recommendation regarding the Town of Friday Harbor (Town) submitted Urban Growth Area (UGA) expansion requests.

PUBLIC COMMENTS

Please send all public comments to compplancomments@sanjuanco.com. Please do not copy the County Council, Planning Commission members, or County staff. Written public comments received by August 19 will be provided to the Planning Commission. Please focus public comments on the discussion topics contemplated in this memo.

BACKGROUND

In a comment letter dated May 17, 2021, the Town requested expansion of the Friday Harbor UGA (Attachment A). The County Comprehensive Plan (*Plan*) establishes the boundary of the Friday Harbor UGA. Lands that are added to the UGA remain in the County jurisdiction as unincorporated UGA until the Town annexes them. Once the Town has annexed property it becomes a part of the incorporated UGA. The Town has jurisdiction over lands within the incorporated UGA.

The unincorporated UGA is governed by *Plan* Appendices 2 and 3. The Countywide Planning Policies in Appendix 2 establish the requirements for designating the Friday Harbor UGA. Land use regulations for the unincorporated UGA are established in *Plan* Appendix 3 the Friday Harbor Urban Growth Area Management Agreement. Land uses in the unincorporated UGA are limited until the area is annexed by the Town.

UGAs and Growth Management Act (GMA)

The Statewide GMA establishes specific requirements for sizing UGAs. Some of the key GMA requirements are summarized below. A staff memo dated February 4, 2020 provides detailed background about UGAs and GMA requirements. The February 4, 2020 Staff Memo is posted online at:

<https://www.sanjuanco.com/DocumentCenter/View/19788/>

Characterized by Urban Growth

A key GMA designation criterion for UGAs is that the land has existing urban growth or is characterized by urban growth. Urban growth is defined in RCW 36.70A.030(24), which states:

"Urban growth" refers to growth that makes intensive use of land for the location of buildings, structures, and impermeable surfaces to such a degree as to be incompatible with the primary use of land for the production of food, other agricultural products, or fiber, or the extraction of mineral resources, rural uses, rural development, and natural resource lands designated pursuant to RCW 36.70A.170. A pattern of more intensive rural development, as provided in RCW 36.70A.070(5)(d), is not urban growth. When allowed to spread over wide areas, urban growth typically requires urban governmental services. "Characterized by urban growth" refers to land having urban growth located on it, or to land located in relationship to an area with urban growth on it as to be appropriate for urban growth.

Urban Governmental Services

The GMA requires that UGAs be served or capable of being served by urban governmental service. Urban governmental services are defined in RCW 36.70A.030(24) as follows:

"Urban governmental services" or "urban services" include those public services and public facilities at an intensity historically and typically provided in cities, specifically including storm and sanitary sewer systems, domestic water systems, street cleaning services, fire and police protection services, public transit services, and other public utilities associated with urban areas and normally not associated with rural areas.

The Town has indicated that the areas proposed for addition to the UGA either are or can be served by urban governmental services.

Accommodating Projected Growth

Another important GMA requirement for UGAs is that they be sized appropriately to accommodate the forecasted population and employment growth. This requirement is established in Washington Administrative Code (WAC) 365-196-310(4)(b). This section of the WAC requires the County and Town to conduct land capacity analyses to be compared with the growth projected during their respective comprehensive plans' planning periods.

WAC 365-196-310(4)(b) states:

(b) General considerations for determining the need for urban growth areas expansions to accommodate projected population and employment growth.

[...]

(ii) Estimation of the capacity of current cities and urban growth areas to accommodate additional population and employment over the twenty-year planning period. This should be based on a land capacity analysis, which may include the following:

(A) Identification of the amount of developable residential, commercial and industrial land, based on inventories of currently undeveloped or partially developed urban lands.

(B) Identification of the appropriate amount of greenbelt and open space to be preserved or created in connection with the overall growth pattern and consistent with any adopted levels of service. See WAC 365-196-335 for additional information.

(C) Identification of the amount of developable urban land needed for the public facilities, public services, and utilities necessary to support the likely level of development. See WAC 365-196-320 for additional information.

(D) Based on allowed land use development densities and intensities, a projection of the additional urban population and employment growth that may occur on the available residential, commercial and industrial land base. The projection should consider the portion of population and employment growth which may occur through redevelopment of previously developed urban areas during the twenty-year planning period.

(E) The land capacity analysis must be based on the assumption that growth will occur at urban densities inside the urban growth area. In formulating land capacity analyses, counties and cities should consider data on past development, as well as factors which may cause trends to change in the future. For counties and cities subject to RCW 36.70A.215, information from associated buildable lands reports should be considered. If past development patterns have not resulted in urban densities, or have not resulted in a pattern of desired development, counties and cities should use assumptions aligned with desired future development patterns. Counties and cities should then implement strategies to better align future development patterns with those desired.

(F) The land capacity analysis may also include a reasonable land market supply factor, also referred to as the "market factor." The purpose of the market factor is to account for the estimated percentage of developable acres contained within an urban growth area that, due to fluctuating market forces, is likely to remain undeveloped over the course of the twenty-year planning period. The market factor recognizes that not all developable land will be put to its maximum use because of owner preference, cost, stability, quality, and location. If establishing a market factor, counties and cities should establish an explicit market factor for the purposes of establishing the amount of needed land capacity. Counties and cities may consider local circumstances in determining an appropriate market factor. Counties and cities may also use a number derived from general information if local study data is not available.

[...]

(iv) If future growth forecasts exceed current capacities, counties and cities should first consider the potential of increasing capacity of existing urban areas through allowances for higher densities, or for additional provisions to encourage redevelopment. If counties and cities find that increasing the capacity of existing urban areas is not feasible or appropriate

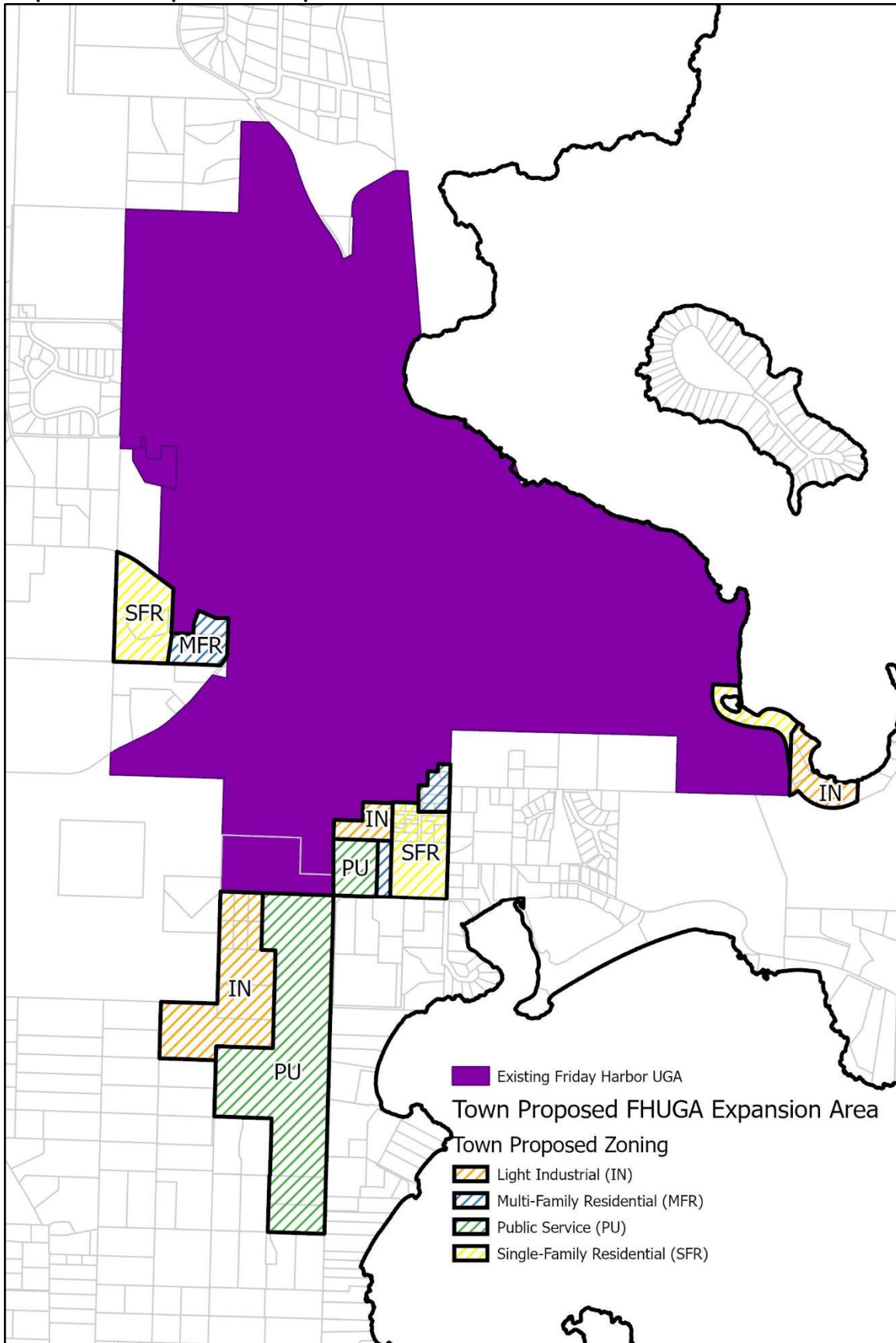
based on the evidence they examine, counties and cities may consider expansion of the urban growth area to meet the future growth forecast.

The Town did not include an estimation of capacity for the UGA with their May 17, 2021 letter. Without an estimation of how projected growth might be accommodated in the UGA, the County cannot determine whether the future growth forecast will exceed the estimated capacity in the existing UGA. County staff met with the Town staff on July 15, 2021, to discuss their options moving forward. At that meeting, Town staff agreed to provide the County with additional information about their capacity needs to satisfy the GMA requirements. That information is expected before the County adopts changes to the *Plan*.

TOWN REQUESTED UGA EXPANSION

Map 1 shows the areas the Town has requested be added to the Friday Harbor UGA in a comment dated May 17, 2021 (Attachment A). In their request, the Town has indicated the probable zoning in each area. This zoning would not be applied until the County has agreed to add the parcels to the UGA and the Town annexes the area. The proposed zoning in these areas should only be used as an indicator of what future uses the Town might intend in the area.

Map 1. Town Proposed UGA Expansion Areas.

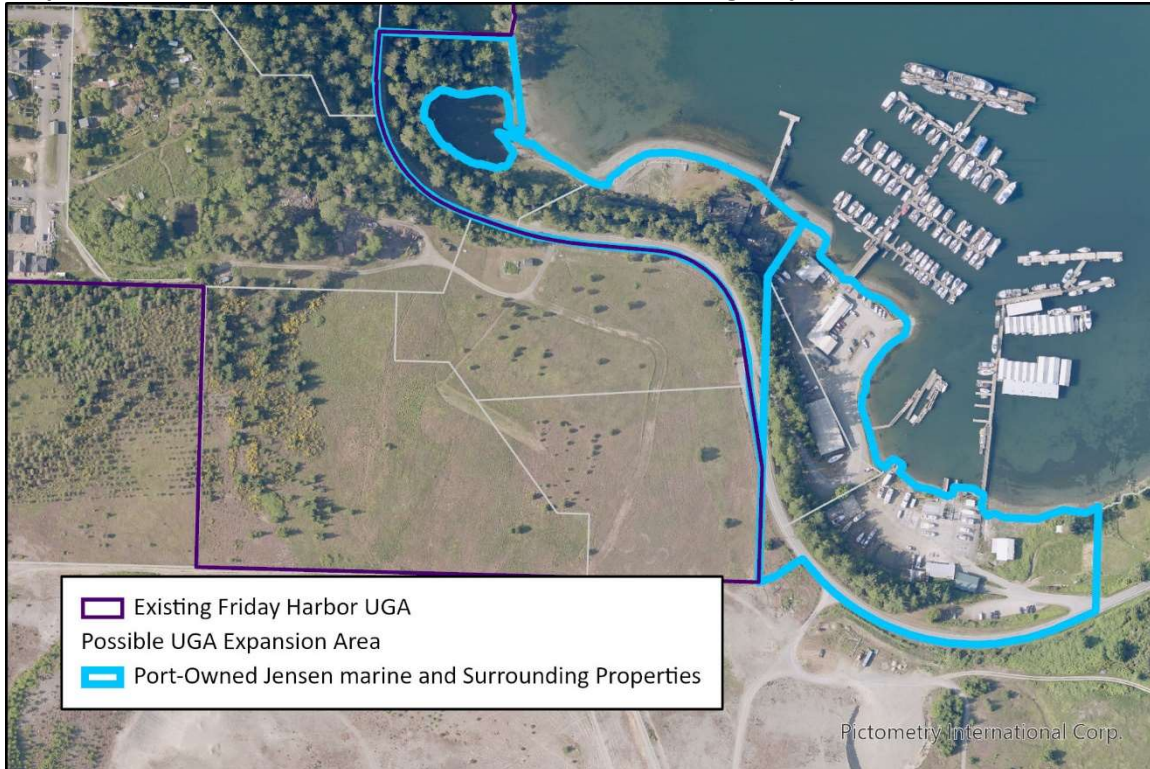


The May 17, 2021 Town comment letter divides the requested expansion of the UGA into four areas. The four areas are:

1. Port-owned Jensen Marine and surrounding properties;
2. Lampard Road area;
3. Argyle Avenue residential area; and
4. Port-owned parcels near the Friday Harbor Airport.

Maps two through five show a 2019 aerial photograph of each area outlined in blue.

Map 2. Area 1: Port-Owned Jensen Marine and Surrounding Properties.



Source: SJC GIS.

Area 1: Port-owned Jensen Marine and Surrounding Properties

The Town has proposed adding five parcels totaling 14 acres around Jensen Marine to the Friday Harbor UGA. They have proposed the expansion to increase residential and light industrial capacity within the UGA. The northern two of the five parcels are privately owned residential properties. The southern three of the five parcels are owned by the Port of Friday Harbor, a public entity, and are primarily used for transportation and light industrial. The entire area is adjacent to the Town incorporated UGA.

The northern two parcels are currently designated Rural Residential (RR). One of these parcels is developed with a single-family residence. The Town proposes residential zoning for the northern two parcels. The northern parcels do not add significant residential development capacity to the UGA because they are small and partially developed. Including the northern residential parcels primarily serves to ensure a logical boundary to the UGA.

The southern three parcels are owned by the Port of Friday Harbor and are developed with a marina and shipyard. The Town has proposed the light industrial zoning for the port-owned parcels in this area. These parcels are already developed with a marina and shipyard. In the past, the Port of Friday Harbor has proposed adding these parcels the UGA.

Surrounding Land Uses

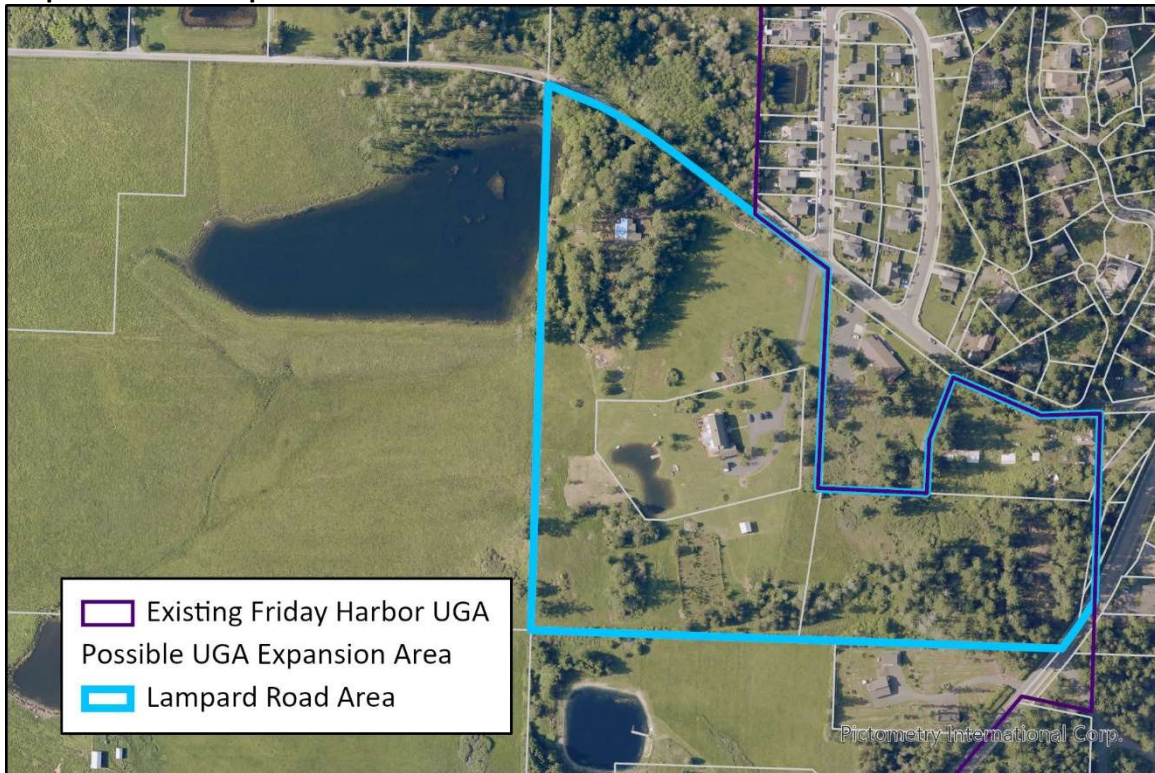
- North: Water (Jensen Bay);
- South: Institutional and Undeveloped, Rural Farm Forest (RFF);
- East: Residential, Rural Residential (RR); and
- West: Undeveloped, Town of Friday Harbor incorporated UGA.

Urban Governmental Services

Urban governmental services are defined in RCW 36.70A.030(24) as follows:

"Urban governmental services" or "urban services" include those public services and public facilities at an intensity historically and typically provided in cities, specifically including storm and sanitary sewer systems, domestic water systems, street cleaning services, fire and police protection services, public transit services, and other public utilities associated with urban areas and normally not associated with rural areas.

Map 3. Area 2: Lampard Road Area.



Source: SJC GIS.

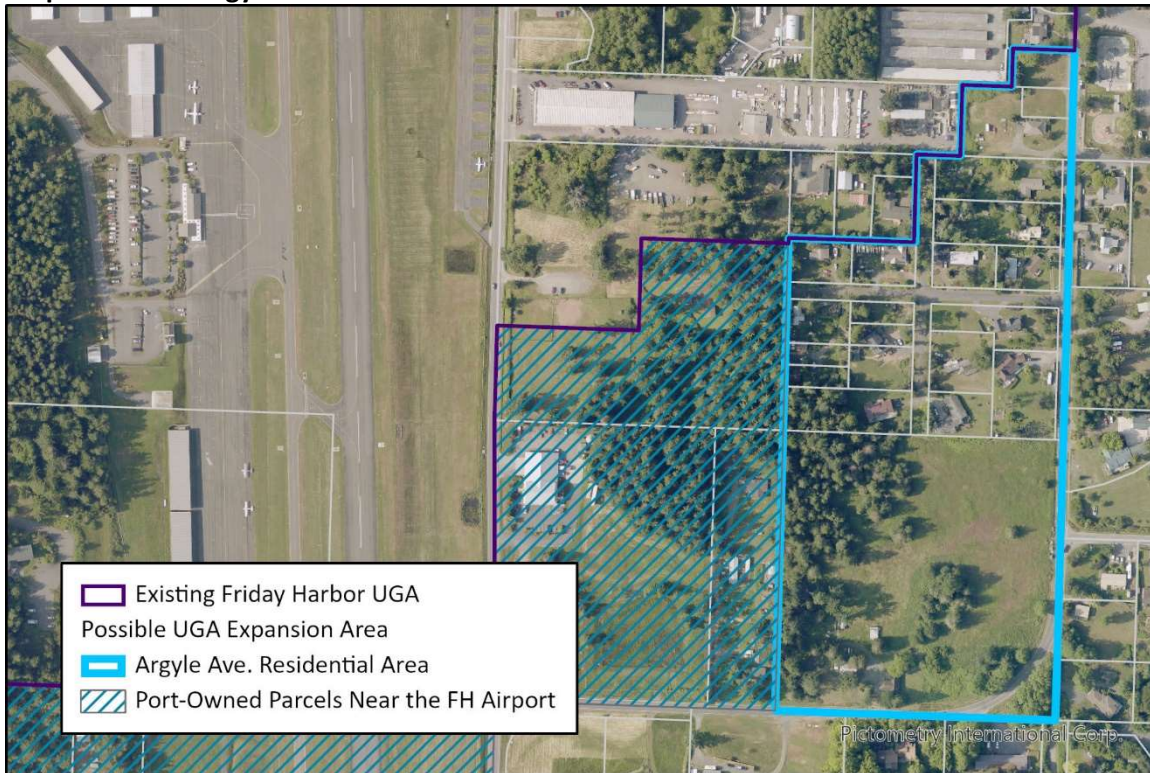
Area 2: Lampard Road Area

The Town has proposed adding four parcels totaling 24.5 acres along Lampard Road to the Friday Harbor UGA. They have proposed the expansion to increase residential capacity within the UGA. The four parcels are developed with three detached single-family residences. The parcels are adjacent to the incorporated Town UGA.

Surrounding Land Uses

- North: Residential, Town of Friday Harbor incorporated UGA;
- South: Residential and Undeveloped, RFF;
- East: Institutional and Commercial, Town of Friday Harbor incorporated UGA; and
- West: Undeveloped and Agricultural, Agricultural Resource Land (AG).

Map 4. Area 3: Argyle Avenue Residential Area.



Source SIC GIS.

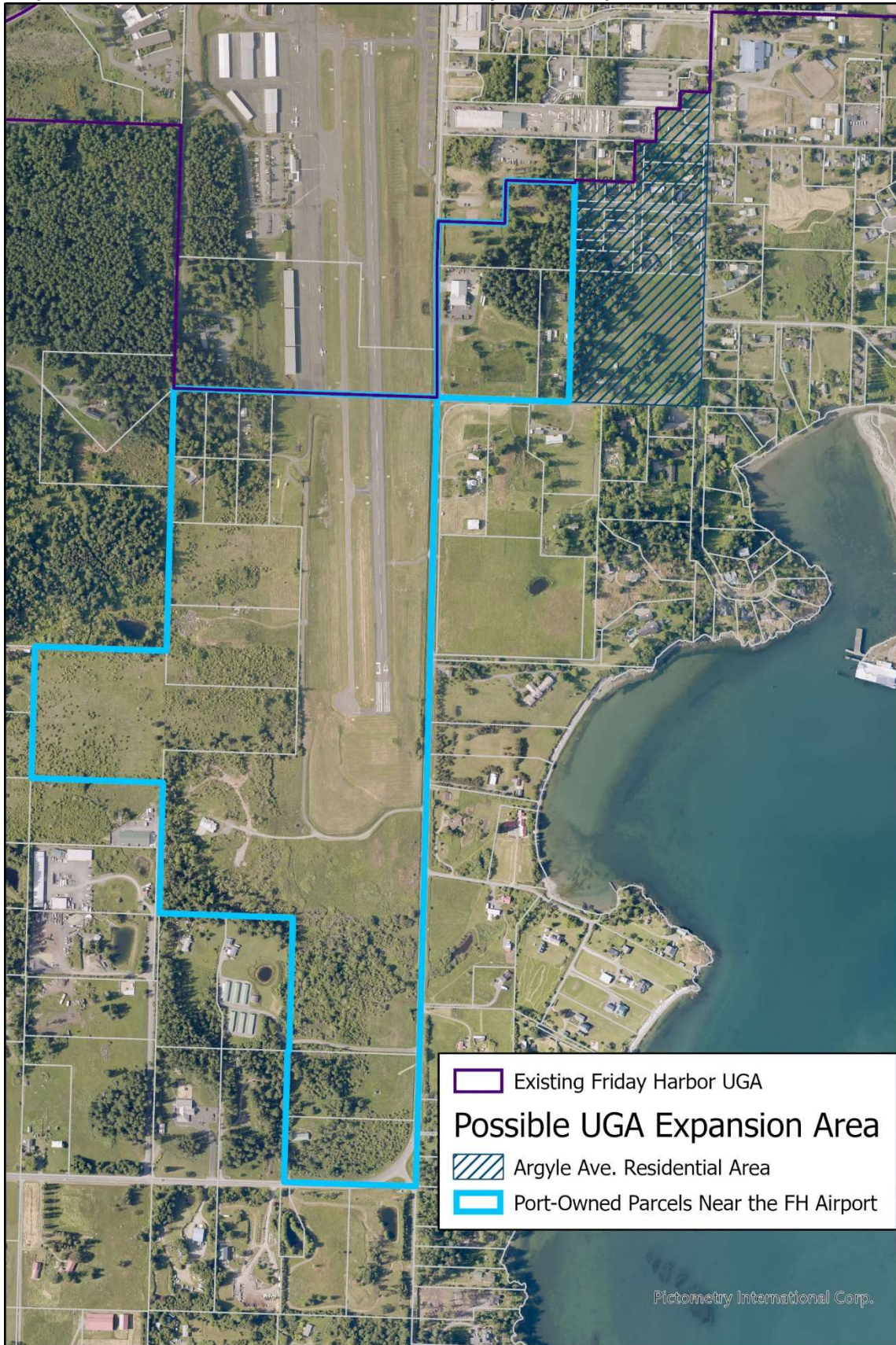
Area 3: Argyle Avenue Residential Area

The Town has proposed adding twenty-one parcels totaling 18.5 acres along Argyle Avenue to the Friday Harbor UGA. They have proposed the expansion to increase residential capacity within the UGA. The area is a mix of both undeveloped land and single-family home development. The Town has proposed a combination of multi-family residential zoning for the northern parcels and single-family residential zoning for the southern parcels. The parcels are adjacent to the incorporated Town UGA.

Surrounding Land Uses

- North: Residential and Commercial, Town of Friday Harbor incorporated UGA;
- South: Residential and Undeveloped, RFF;
- East: Residential, RR; and
- West: Institutional and Residential, Rural General Use (RGU).

Map 5. Area 4: Port-Owned Parcels Near the Friday Harbor Airport.



Source: SJC GIS.

Area 4: Port-Owned Parcels Near the Friday Harbor Airport

The Town has proposed adding fourteen parcels totaling 52.75 acres surrounding the Friday Harbor airport to the Friday Harbor UGA. They have proposed the expansion to increase public service and light industrial capacity within the UGA. Nearly all the parcels are owned by the Port of Friday Harbor. The area west of Cattle Point Road is primarily undeveloped except for the Friday Harbor Airport runway. The area near the intersection of Argyle Avenue and Cattle Point Road developed with single-family residences and a fire station. The Town has proposed a combination of light industrial and public service zoning for these parcels. The parcels are adjacent to the incorporated Town UGA.

Surrounding Land Uses

- North: Transportation (Friday Harbor Airport) and Residential, Town of Friday Harbor incorporated UGA;
- South: Residential and Undeveloped, RFF and RGU;
- East: Residential, RFF; and
- West: Undeveloped and Residential, RFF.

STAFF RECOMMENDATION

Staff recommends the Planning Commission make a preliminary recommendation for expanding the UGA as proposed by the Town. This will give the Planning Commission the opportunity to get input from the neighboring property owners on the proposed expansion. It will also give the Town the chance to put together the additional information about their capacity needs in advance of the Planning Commission making a final recommendation to the County Council. The public feedback can then be taken into consideration with the Town stated need for capacity before the Planning Commission makes a final recommendation to the County Council.

The final decision on whether to expand the Friday Harbor UGA must be contingent on the Town providing more information about land capacity needs in the UGA. During planning coordination meetings, Town staff has agreed to provide more information about the Town's land capacity needs before the County adopts the *Plan* update. Before the final decision is made, the proposal will need to be analyzed for consistency with WAC 365-196-310 using the Town provided land capacity information. In the meantime, the County can collect public comments on the proposed expansion during public participation efforts, including the San Juan Island Official Map Town Hall.



TOWN OF FRIDAY HARBOR
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May 17, 2021

Erika Shook
Community Development Director
San Juan County

Adam Zack
Planner III
San Juan County

Ms. Shook and Mr. Zack,

The Town of Friday Harbor appreciates the opportunity to comment on the Friday Harbor Urban Growth Area (FHUGA) expansion applications that San Juan County (SJC) received for the current SJC Comprehensive Plan update. The Town completed an update of its Comprehensive Plan in 2018.

Currently, the Town does not have updated housing availability numbers for the next 20-year planning horizon from 2025 to 2045. However, the Town has determined several of the potential units in the 2018 Comprehensive Plan will remain underdeveloped during the current 20-year planning horizon as fiscal constraints to extend sewer and transportation improvements has delayed development or a property owner is not ready to complete improvements. In addition, the potential units within the 2018 Comprehensive Plan did not include a multiplier for other market factors.

A cursory calculation of occupancy certificates and building permits was completed to provide context to review of the FHUGA expansion applications. In the 3 years since adoption of the 2018 Comprehensive Plan, the Town has added an average of 10 single-family units per year, and 28 multi-family units per year. If construction continues at this pace, we expect the land inventory to reach 50% of the potential units reported in the next 3-5 years.

On April 15, 2021, Community Development and Planning (CDP) presented the FHUGA expansion application requests to the Town Council. The potential FHUGA expansion discussion was positive. Town Council expressed a strong interest to provide affordable housing to San Juan Island residents. The State sent a strong affordable housing message outlining legislation intent in E2SHB 1220. This bill signed into law by Governor Inslee requires Comprehensive Plans to include affordable housing policies to address housing options for moderate, low, very low, and extremely low median income levels and contains language directing implementation across development regulations. CDP Staff included potential Town Zoning designations for future annexation in each attached figure.

In review of the FHUGA expansion applications, CDP Staff concluded other parcels should be included during this SJC Comprehensive Plan Update. The Town is requesting SJC to consider

additional properties that include areas of existing urban development such as all parcels in Port ownership adjacent to and near the Friday Harbor Airport, and connector parcels for a contiguous FHUGA. The newly acquired Port property at Jenson Marine is another area which is best served by urban services, however planning for urban services in this area will not occur until the 2025 Comprehensive Plan Update. The Town would support adding the Port's existing urban development and the two connector parcels should SJC determine the parcels shown are appropriate to designate FHUGA (Figure 1).

The other parcels Town is requesting for inclusion in the FHUGA expansion review are required to maintain a contiguous Town limit. RCW 35.13.005 limits annexation to areas in which urban growth areas have been designated and RCW 35.13.010 further restricts annexation to those areas lying contiguous to the Town.

Request-Application 18-0013

This is a rezone request to change from Rural Farm Forestry to Rural General Use. The allowed uses in General Rural are compatible with the future land uses in the Town's Comprehensive Plan and the current zoning designations.

Request-Application 18-0016

The Town is in support of this request to designate the requested parcels as FHUGA. Urban services are available near the location. CPD Staff would recommend future zoning to be Single-family Residential for the parcels adjacent to Lampard Road with proximity to agriculture and potential critical areas., and Multi-Family Residential for the Parcel adjacent to Spring Street. The Town is also requesting the following parcels to be designated with the request (Figure 2):

- 351424002000 Owner-Herbert Mason
- 351491701000 Owner-Church of Jesus Christ of the Latter-Day Saints
- 351491624000 Owner-Town of Friday Harbor

Request-Application 19-0002

The Town is in support of this request to designate the requested parcels as FHUGA. Urban services are available near the location. One parcel separates the requested FHUGA designation parcel and the application from the Port of Friday Harbor to designate Parcel Number 352231201600. The adjacent SJC zoning is Rural General Rural Farm Forest and Rural Residential. The adjacent parcels zoned Rural General are currently developed as single family residential, a stormwater pond for the Friday Harbor Airport and the San Juan Island Fire Department these land uses are compatible with the CDP Staff's recommended future zoning of Single-Family Residential. The Town is also requesting the following parcels to be designated with the request. (Figure 3):

- 351444003000 Owner-Jill Marie Pattern and Sara Louise Patten
- All parcels in the Northeast, Southeast, Southeast section of section 14, T 35N, R 3W

Request-Application Port of Friday Harbor

In the Town's discussions with the Port of Friday Harbor (Port) on airport planning, the Town and Port concluded this would be an appropriate time to request SJC to include all Port properties in the FHUGA, as airport operations are currently split between SJC and the Town. The Port and the Town have discussed Port properties for the next Town of Friday Harbor comprehensive planning effort in 2023. Expanding the FHUGA to include Port properties during this SJC comprehensive planning effort will provide predictability for Annexation discussions, including a plan to provide urban services to this essential public facility. In addition, the Town currently provides Town services to several of these parcels. (Figure 4).

Sincerely,

A handwritten signature in blue ink, appearing to read "Ryan Ericson". The signature is fluid and cursive, with a large initial "R" and "E".

Ryan Ericson
Community Development Director
Town of Friday Harbor
(360) 378-2810 x231
ryane@fridayharbor.org



San Juan County GIS, Pictometry International Corp., San Juan County Assessor's Office



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1 in = 280 feet

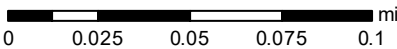
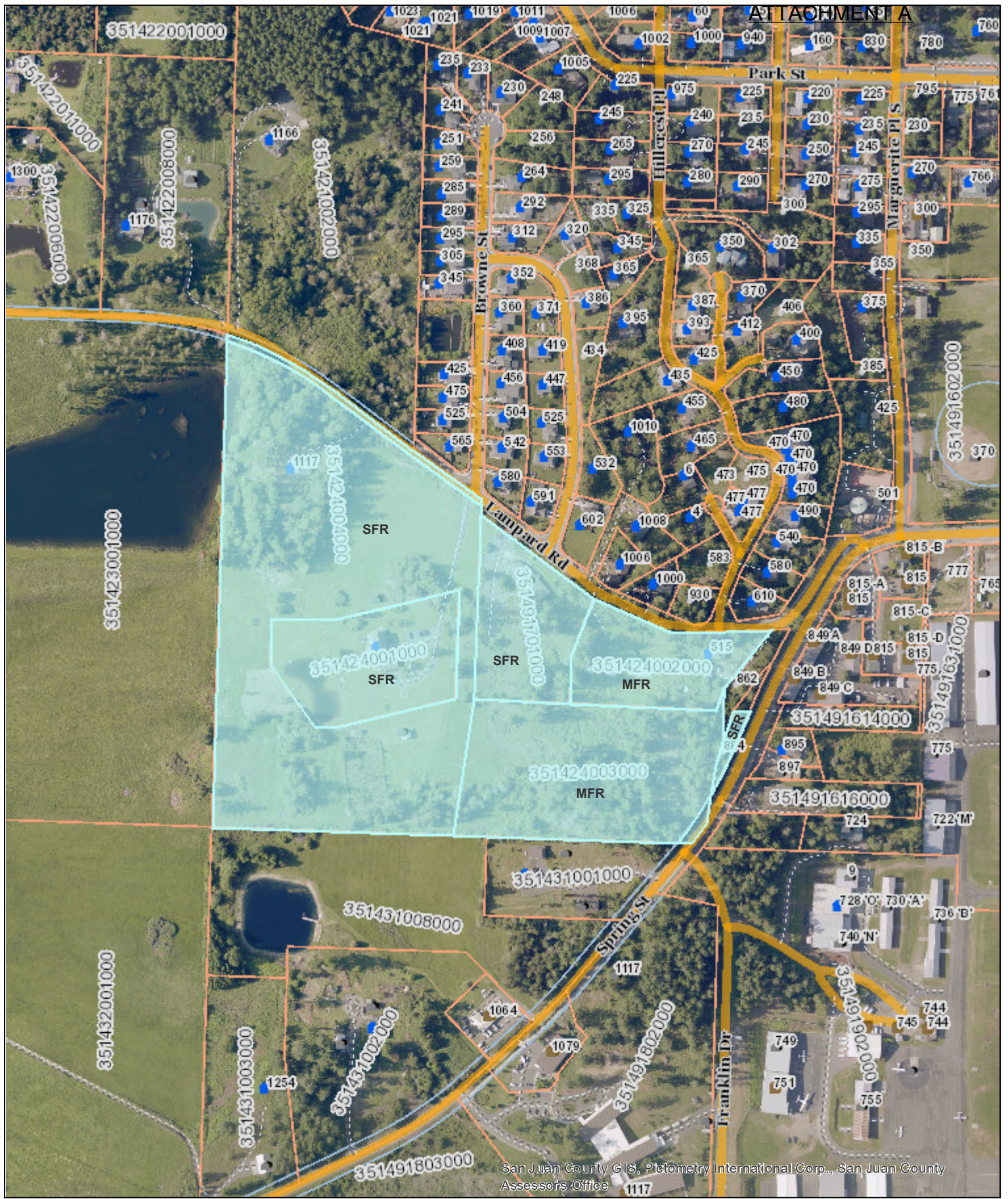


Figure 1



San Juan County GIS, Pictometry International Corp., San Juan County Assessor's Office



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1 in = 330 feet

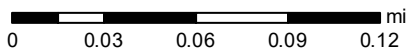
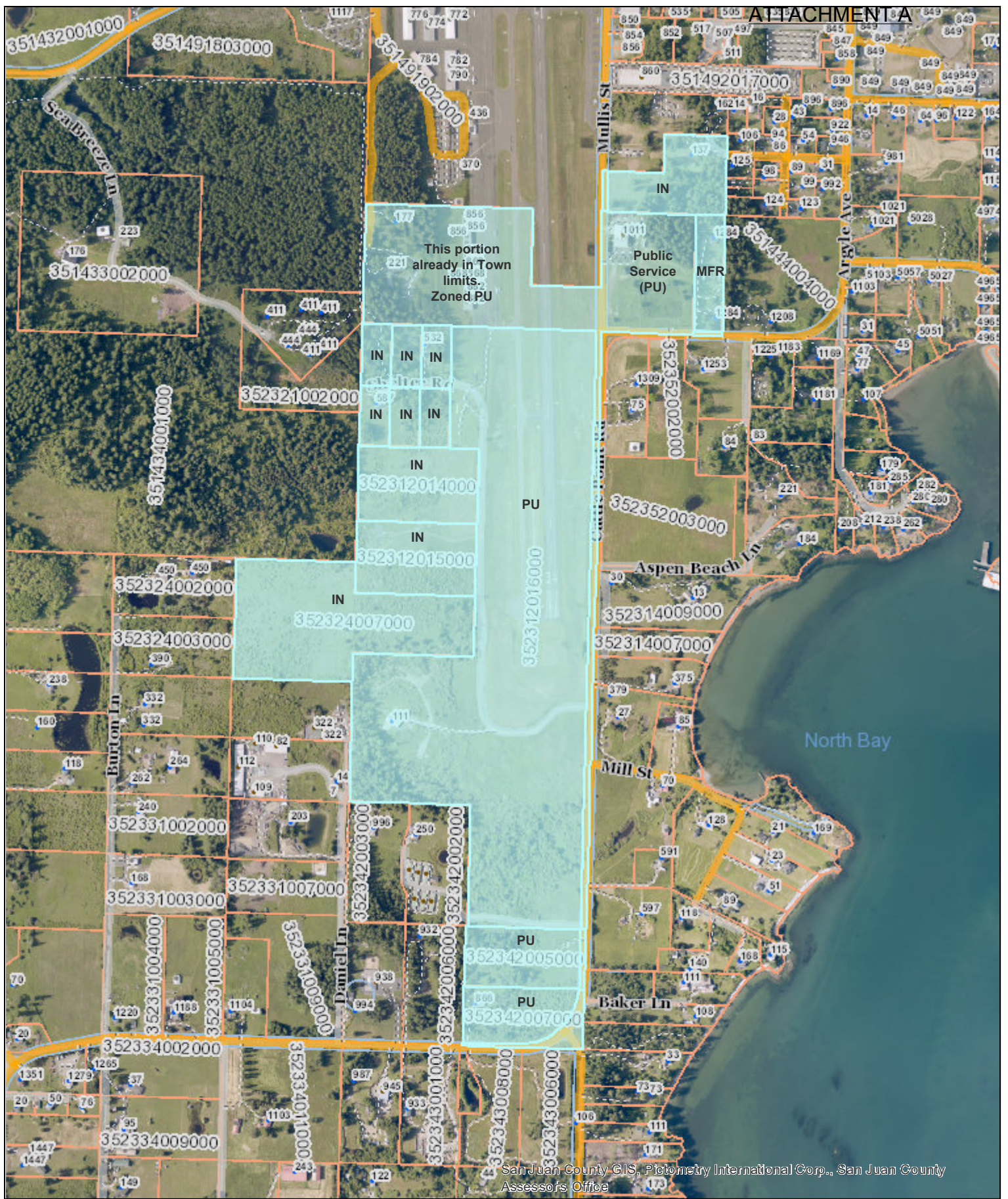


Figure 2



San Juan County GIS, Pictometry International Corp., San Juan County Assessor's Office



This map is derived from San Juan County's Geographic Information System (GIS). It is intended for reference only and is not guaranteed to survey accuracy. The information represented on this map is subject to change without notice.

1 in = 700 feet

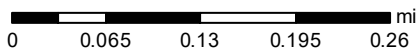


Figure 4