

San Juan County Housing Report

September 2021 - by Steve Smith

This document will often reference the County Department of Community Development (DCD) and what the DCD does and does not do. Please know that I am not placing responsibility on the DCD for many of the things that it doesn't do. Instead, I think that the responsibility for many of the issues lies with those giving the instructions -- the County Council, Planning Commission, and the State via the Growth Management Act. The DCD actions are also largely influenced by the funding provided for the DCD by the Council. So, when I say that the DCD doesn't do something, it may well be because they were not instructed to do so or they were not provided adequate funding to do it along with all of the other things for which they are given responsibility.

This report is the type of work I would like to see the DCD do. In order to solve the housing issue, we need to have a solid set of facts with which to work. However, the DCD does not have the budget or the staff with time to perform optional work. So, I have taken it upon myself to collect the data and try to present it in a comprehensible way. And, I work for free.

The County needs to initiate a County-wide discussion about housing. I do not believe that the Comp Plan town halls accomplish this, for reasons stated in this report.

In this report:

- Why I think we need to consider more than just historical population data, such as demographics and the different classifications of housing units, as we project our housing needs.
- Some housing data.
- How I propose we engage most of the public -- not just the organized groups -- in the housing discussion.
- The options I think that we, as a community, have available to us.

[Disclosure about Steve Smith, the author of this report.](#)

While the DCD has done excellent work in compiling a great deal of information, the Comp Plan fails to adequately address the housing needs and requires adjustments, if we want to improve the housing situation. The primary drivers of the Comp Plan are the population and housing projections over the next twenty years. I believe that there are some very significant issues with some of the data being used.

This report is not meant to be critical of the DCD but to point out areas of the Comp plan that need improvement.

The Comprehensive Plan and growth projections

A primary focus of the Department of Community Development (DCD) is completing the Comp Plan as desired by the County Council and State law. The housing discussion is a vital part of that process. Due to the limited resources of the DCD, virtually everything in the Comp Plan is based on the housing and population estimates. Here, I identify some of the problems with the Comp Plan, as it is currently drafted.

Historical Data Issue

The DCD forms The Comp Plan by using historical population trends to estimate future growth. These projections are, then, used to make decisions on density, land use designations for various parcels, and the boundaries of Urban Growth Areas (UGAs). This entire process is controlled by the Growth Management Act (GMA), which is the State law affecting most decisions the County makes regarding how our community develops.

In this section, I will show how the DCD significantly undercounts the number of historical units used to make its predictions and does so by at least 1,020 units.

The data in this section was obtained from the Washington State Office of Financial Management (OFM) and from a DCD spreadsheet showing building permit data by island. The OFM report, [Jan 8, 2021 Housing Needs Assessment Appendix 5 Draft Report Page 52, Table 5-17](#) (HNA) contains data spanning 1980 to 2016. The DCD spreadsheet spans 2010 to August 2021. The two different documents overlap for the years 2010-2016 with some variation in the number of permitted units for the overlap years. I chose to use the OFM data for the overlap years.

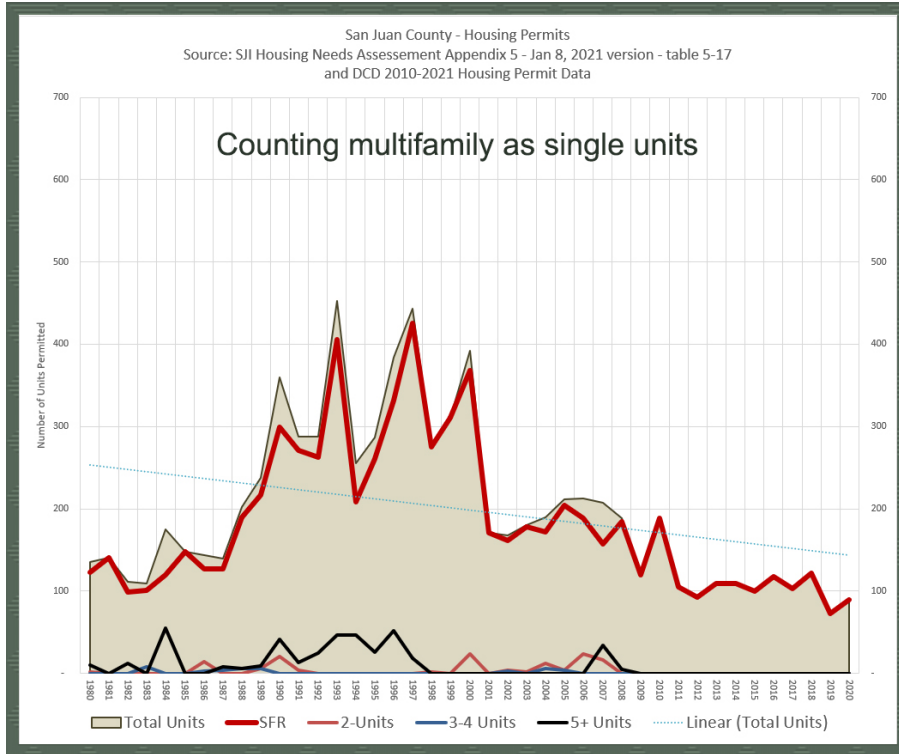
Note: On top of this discrepancy, the DCD uses data from the Office of Financial Management (OFM) and historical building permit data to help it estimate what the housing needs will be for the next twenty years. The OFM gets some of its housing estimates from the DCD. It is circular.

The DCD reports an average of 209 building permits being added each year between 1980 and 2016. However, using the same data points, I calculate the average to be 260 units.

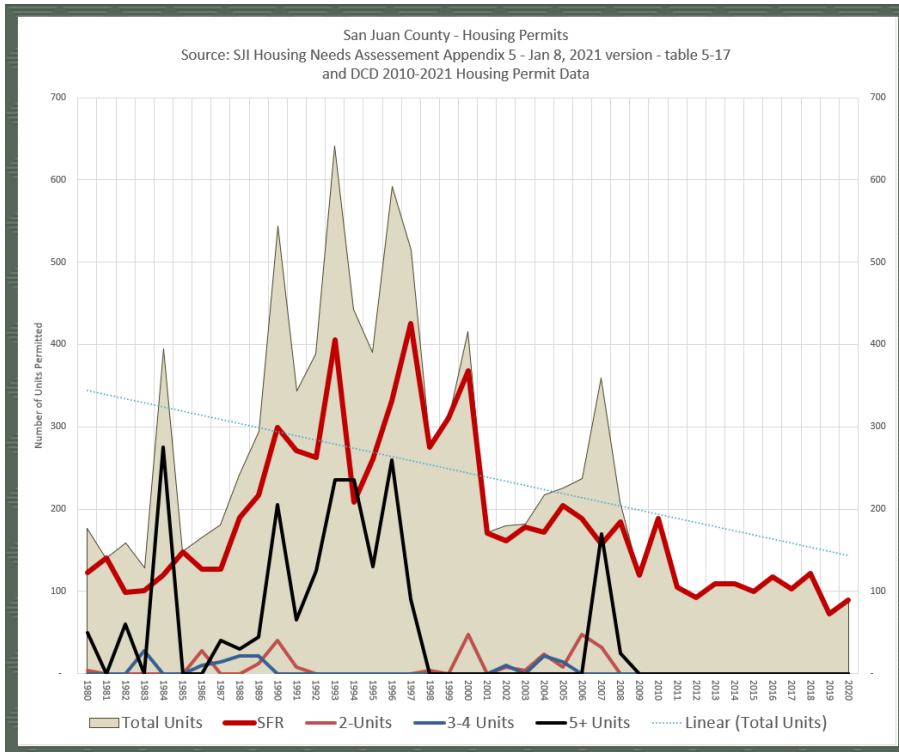
The reason for the difference is that the OFM and the DCD treated multifamily units as a single housing unit. Instead, I count each unit within the multifamily property, when that information is available.

The difference is illustrated in the next three graphics.

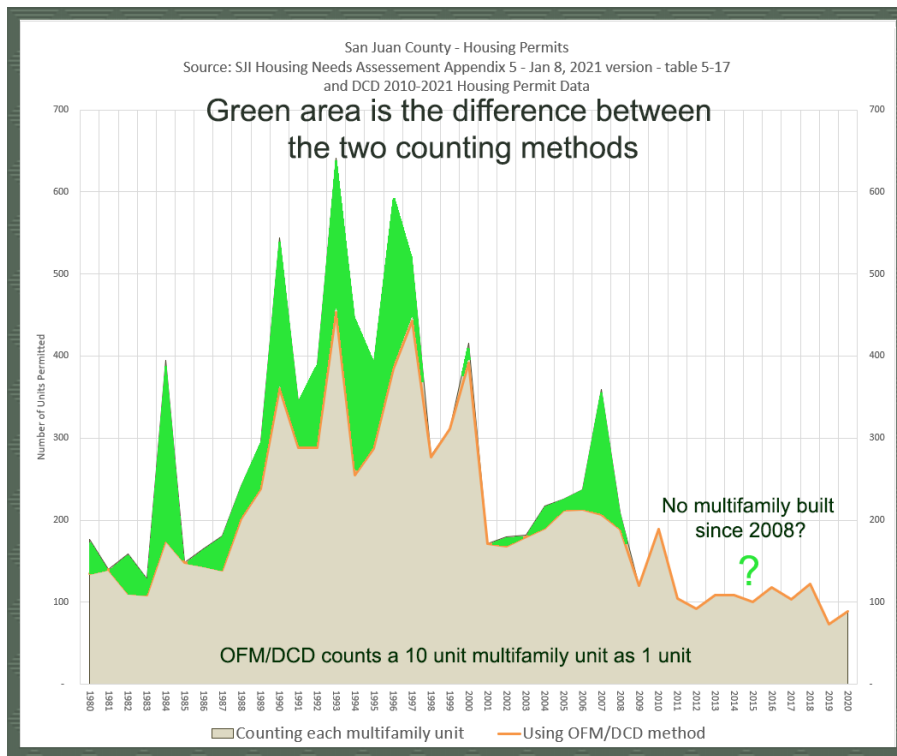
Graphic 1a - CDC's Method of Counting Multifamily Units as Single Units



Graphic 1b - Counting Multifamily Units as Multiple Units.



Graphic 1c - The Difference Between the Two Methods.



The HNA table 5-17, linked to above, reports some of the multifamily units as being 5+ units. A ten-unit apartment building would be counted as a single housing unit. The OFM and DCD counted those theoretical 10 units as 1 unit. I counted them as 5 units. Both counts undercount the number of units, but mine is to a lesser degree. The DCD would underestimate a 10-unit building by nine units, whereas I would underestimate the number of units by half in this example.

To have sound predictions, the DCD should minimize the undercounting of units. The data needed to do so should exist in the paper files in the DCD records. As historical permit data is the foundation for the entire Comp Plan, the paper files are worth pulling and counting the actual number of units added.

The DCD shows no multifamily units being built since 2008. I do not think this is correct, and this further decreases the historical housing unit count. The historical housing unit count will affect the projected housing unit counts.

The DCD undercounts the number of units added each year, historically, by at least 51 units. Project that 20 years, and that results in an undercount by 1,020 units.

The DCD reports an estimated 4,180 new housing units needed by 2036. However, if one adds the undercount of 1,020, then the total new units needed by 2036 is actually 5,200 new units.

Table 5-16. 2036 Housing Unit Forecast Using Employment Security Department Permit Data 1980-2016.

	Units Added Per Year	Total New Units Expected by 2036	2036 Housing Units	2036 Occupancy Rate	2036 Vacancy Rate
FORECAST	209	4,180	18,059	52.7%	47.3%
FORMULA	Average number of building permits 1980-2016	209 annual units times 20 years	2016 Units plus Total New Units Expected	2036 households / 2036 forecasted housing units	100% - 2036 forecasted Occupancy Rate

Source: Employment Security Department (ESD) data 1980 – 2016 and Staff calculations.

The source DCD cited for the HNA table 5-16 is probably not accurate. I believe that the DCD used [this OFM file](#).

I believe that the DCD is missing a large number of units in its report on the number of building permits issued since 1980 and that the numbers should be re-examined for accuracy.

Not Accounting for Rental Needs

While reading my statements in this section about the DCD, please note that I am not criticizing the DCD. The DCD is following instructions, and I argue that the instructions have been inadequate. In effect, when I say "DCD," I am pointing the finger at those who give the DCD their marching orders.

The Comp Plan does not take into consideration the demand for long-term rentals. For the DCD, every person is the same; there is no distinction between owners and renters. While the Comp Plan recognizes that there has been a shift in 'owner vs renter' ratios, that does not translate into the formulas that determine how many houses/units are needed in total.

For example:

Assume that the total population increased by 10% over the last 10 years. So, the DCD projects that it is likely we will continue to increase by 1% per year over the next 20 years.

At the same time, the percentage of homes lived in by owners has increased at a faster than 1% rate per year while the total number of rental units has decreased each year.

We can make alternative assumptions, based on those facts.

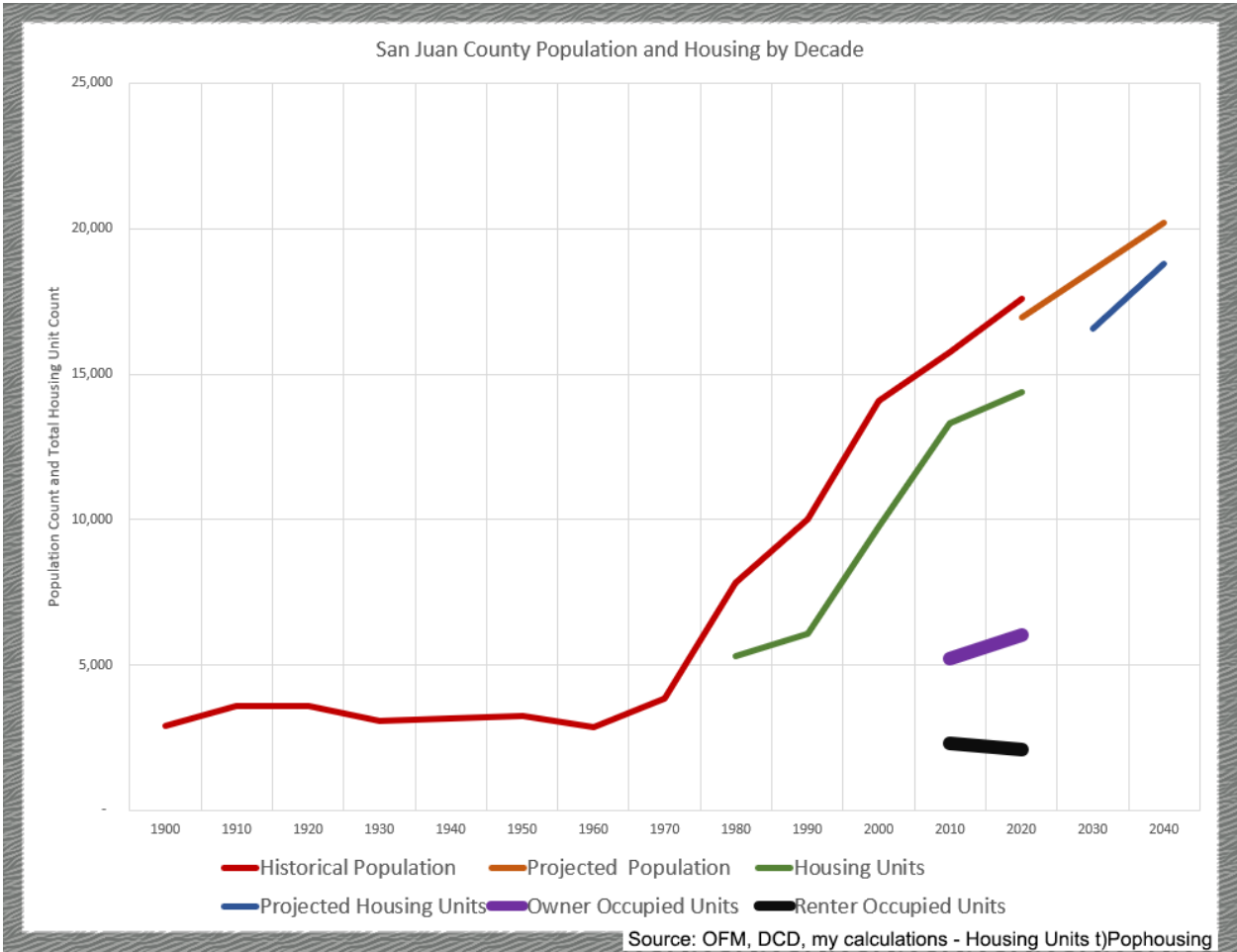
1. Former renters had the means and preferred to be owners; thus, the demand for rentals has decreased.
2. **Or**, we can assume that the need for long-term (LT) rentals has remained the same or increased but the renters are being squeezed out of the market by

owners who are able and willing to take rental units and convert them to either owned and lived-in homes, seasonal homes, or vacation rentals.

Data from the [Pew Foundation](#) shows that, across the nation, the percentage of people living in rental housing has increased. It is likely that the people of San Juan County follow that pattern and that the demand for rental housing has increased, not decreased.

Graphic 2 below shows the historical population and housing data provided by the OFM/DCD and the DCD's projections for future population and housing through 2036. Then, to maintain a normalized slope, I extended the DCD's projections to 2040 and added owner-occupied and renter-occupied units from 2010 to 2020, obtained from the Census.

Graphic 2



Note: The OFM has released 2020 housing numbers for San Juan County. When this is written, the population numbers have not been released for 2020.

The occupied housing units made up 56% of the housing in 2010 and 57% in 2020. We do not have data for other decades. The black (rental units) and purple (owner-occupied units) are 56% of the housing units in 2020. The remaining 44% are 'vacant' units, of which almost all are seasonal homes.

The number of rental housing units has declined for the County, while all other types of housing have increased.

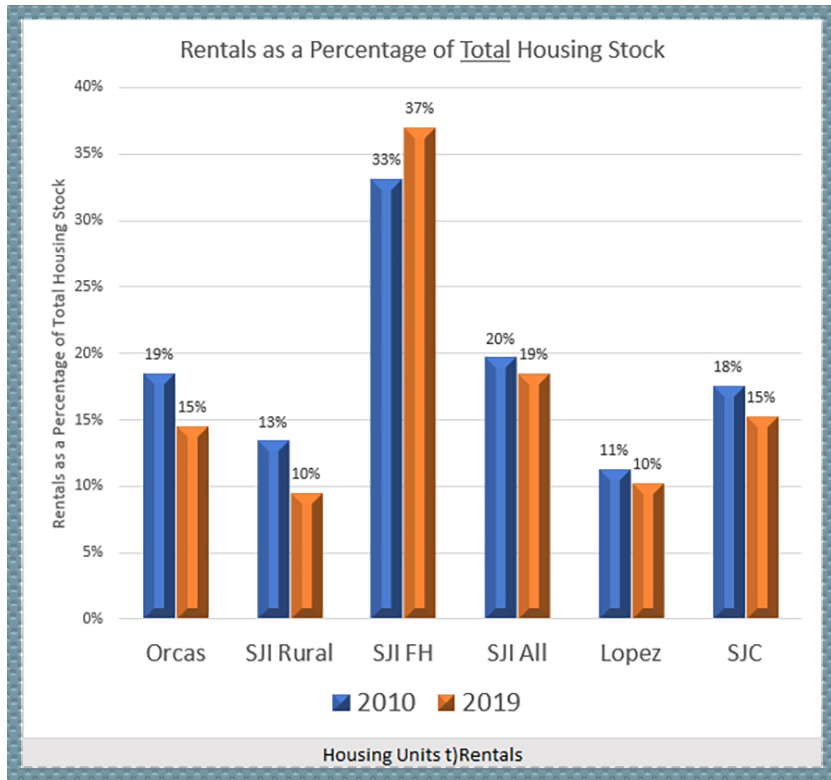
In order to account for the LT rental needs of the community, the Comp Plan should use the population trend as one factor for housing needs but should also add to that enough LT rental units to maintain the same percentage of rental units in the total housing stock. It doesn't do this because it isn't a part of the instruction set given to the DCD.

Renters have not been converting to owners. Instead, renters are being forced out of the rental units. In order to accommodate the renters, additional rental units are needed to maintain housing for those who need and prefer that type of housing.

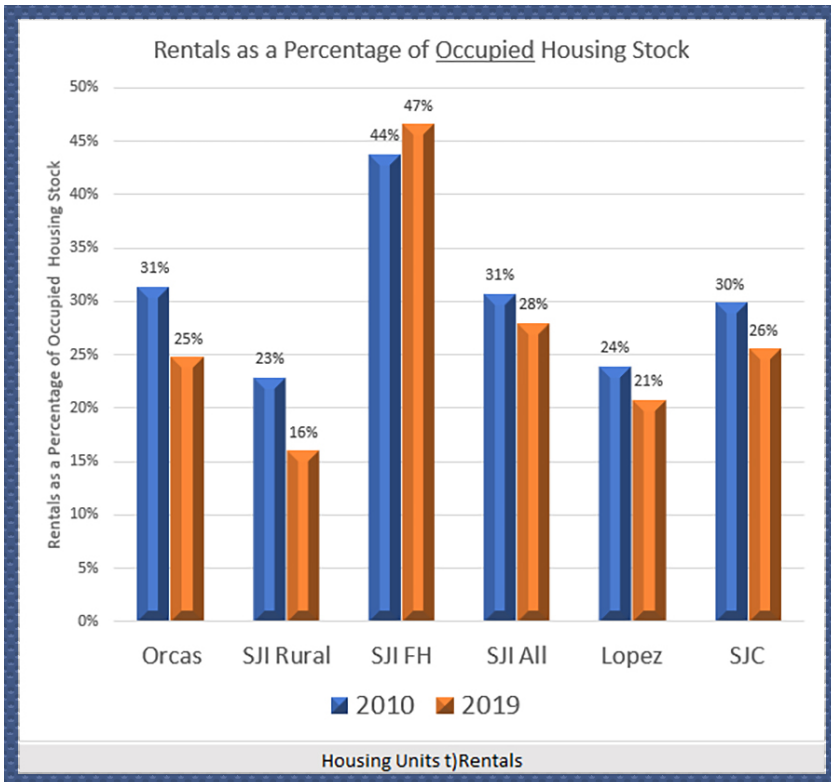
The DCD should not only consider the population trends but also include the ratio of owned-to-rented homes as a part of the housing projections. This will increase the projected housing needs over the next 20 years.

The ratio of LT rentals to owner-occupied homes matters. Every community needs a portion of its homes to be LT rentals. In Graphic 3, we can see that the number of LT rentals has failed to keep up with the total housing stock for every Census tract except Friday Harbor.

Graphic 3a



Graphic 3b



Graphic 3a shows the number of rental units as a percentage of the total housing stock while Graphic 3b shows the number of rental units as a percentage of the occupied housing stock. The source for the data is the Census.

The total housing stock includes:

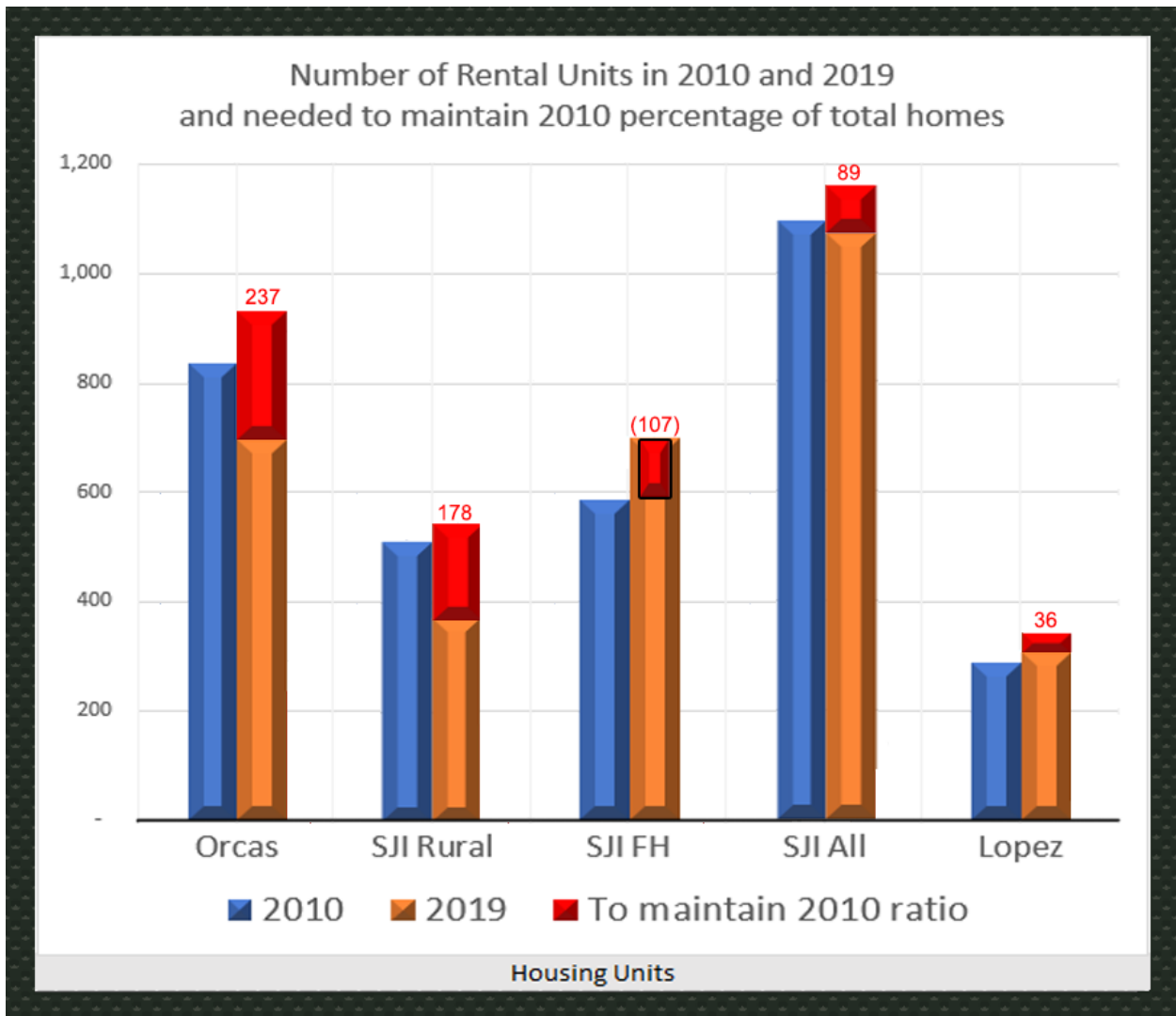
- Owner occupied
- LT renter occupied
- Seasonal housing
- Vacation rentals

The occupied housing stock includes:

- Owner occupied
- LT renter occupied

If we work on the assumption that we want to maintain the percentage of rentals to total housing units we had in 2010, then the community would have needed to build more rental units than they actually did.

Graphic 4



On Orcas, LT rentals made up 19% of the total housing stock in 2010. In order to maintain that ratio, there would need to be 237 more LT rental units now than there are. We would need another 139 units just to have as many as we did in 2010. The additional 98 units (237-139) would maintain the 2010 ratio.

In other words, even if over the last ten years no LT rentals had been lost, we still would have needed to add 98 LT rentals in order to maintain the same ratio we had in 2010. But, because 139 LT renters lost their homes over the last ten years, Orcas Island is now 237 units short of having the same percentage of rental homes (when compared to the total housing stock) as it did in 2010.

The DCD projects, using population trends alone, that the Eastsound UGA will need space for another 252 housing units of all types by the year 2036. We need 139 LT rentals in the UGA

now, just to return us to what we had in 2010. We need 237 LT rentals now, if we want the same proportion of rental units that we had in 2010. Or, we can choose to use the DCD projections, which do not take into consideration the demand for LT rentals. Note that, under current County regulations and State laws, almost all LT rentals have to be built within the UGA.

San Juan Island figures are broken out into the rural and Friday Harbor sectors and, then, the island is considered as a single entity. The rural portion of the island saw a dramatic drop in the number of LT rentals; but Friday Harbor saw a significant increase. If we look at rural San Juan Island alone, then 178 new rental units would need to exist now that don't, just to maintain the 2010 percentages. Friday Harbor built more LT rental units and increased the percentage when compared to 2010. Looking at the island as a whole, San Juan Island is short 89 LT rental units, if it wanted to maintain the 2010 ratio.

Lopez had a low percentage of rentals compared to total units in 2010, and that declined into 2019. Lopez needed to build 36 more units than it did in order to maintain the 2010 ratio.

The Comp Plan is required to project needs 20 years into the future. Graphics 2 through 4 make no projections. Graphic 4 just shows the number of LT rental units that needed to have been built by 2019 in order to maintain the 2010 percentage ratios.

The demand for LT rentals is most acute on Lopez and Orcas. Even though Lopez doesn't need as many units, the rental percentages for Lopez are the most constrained of any of the three islands. Refer to Graphic 3 and note that 21% of the Lopez occupied homes are LT rentals. Because Friday Harbor has built a significant number of LT rentals, the rental housing shortage on San Juan Island is much less severe than on Orcas and Lopez. Friday Harbor has a different set of regulations than the County, which allows the demand for housing to be met in Friday Harbor while it is not met outside of the town limits.

The Comp Plan needs to determine if more long-term rentals are needed and, if so, what adjustments need to be made to the Comp Plan to allow that to happen. If it is determined that we need more LT rental units, then the Comp Plan projections will need to be modified, which will affect many of the other decisions in the Comp Plan.

If we decide that we do not want to accommodate more LT rentals because it would cause the population to increase more than we want it to, then that should be a decision that the community makes as a whole, as it affects everyone in the County in a significant way.

Our current land use regulations have caused few LT rentals to be built in the County (outside of Friday Harbor) since 2006. Many say that the rents from LT renters are insufficient to make building LT rentals economical. Yet, Friday Harbor has added 114 rental units since 2010. The only difference between Friday Harbor and the rest of the islands are the regulations.

If we decide to accept the Comp Plan as is, we are choosing to perpetuate the rental housing shortages on Orcas and Lopez.

The primary question of the Comp Plan is: do we, as a community, prefer the attrition of LT rental units to help limit population growth.

Please see the [VR Housing Report](#) for graphics about the quantities of various categories of homes by island.

Employee Housing Needs

There are two categories of housing needed for employees. There are seasonal and year-round employees. The type of housing needed for each differs.

Because seasonal workers are not considered residents, they are not a part of the population data. From the Comp Plan's perspective, seasonal workers do not exist and, therefore, the housing they use isn't considered in the Comp Plan calculations.

I am unaware of any data that exists on the number of housing units that are needed to assure housing for an adequate workforce. I believe that it would be wise to engage the Chamber of Commerce on each island and the County Economic Development Council to survey all of the employers, asking them what the housing needs are for their employees.

The DCD and the Planning Commission need this information to effectively do their job.

There is a great deal of anecdotal evidence of a housing and labor crisis, especially on Orcas, with the story making national news. [Seattle Times article](#), which was also published by the New York Times.

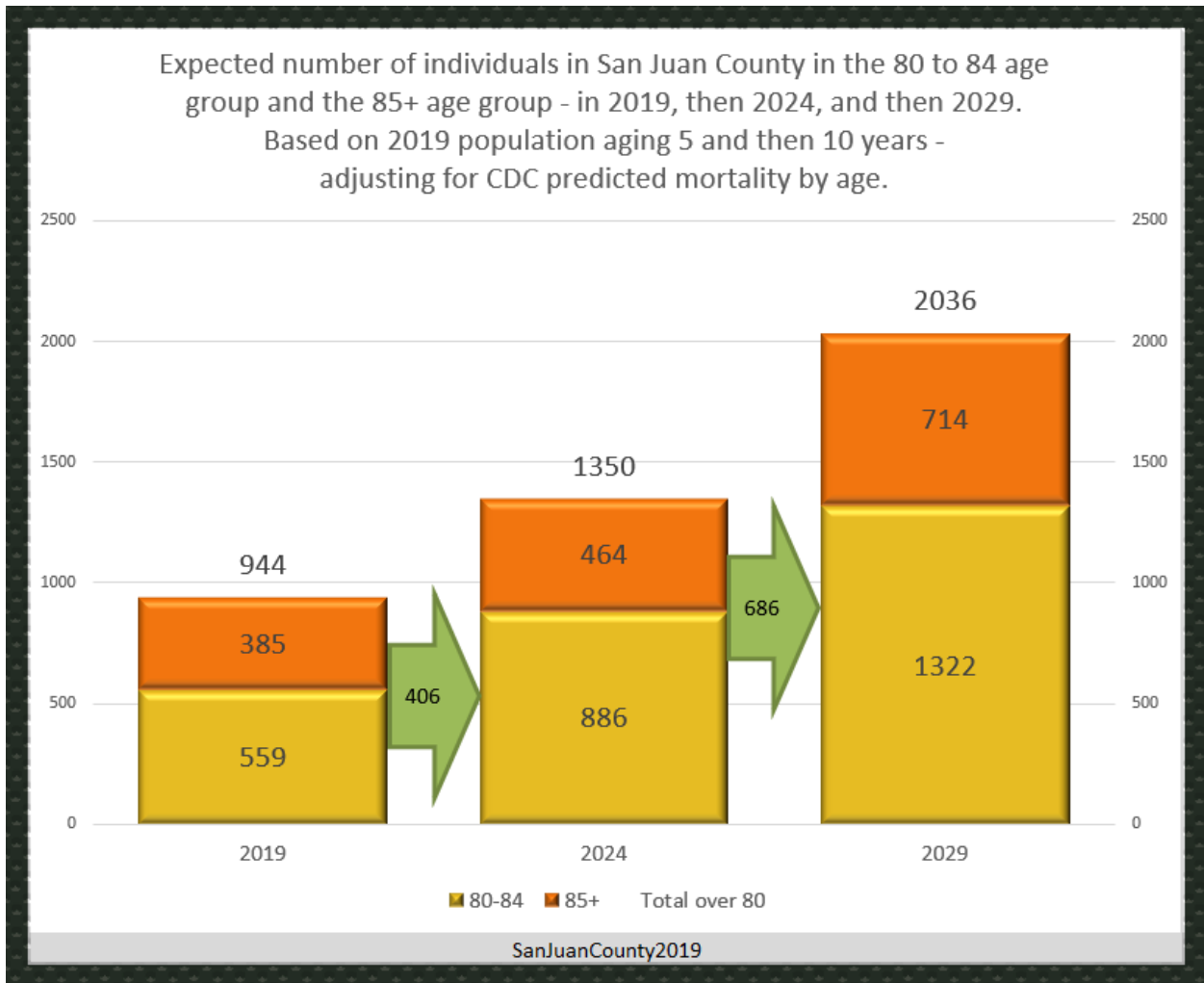
Now, an unknown, but significant, number of people are living in trailers, campers, or mobile homes which are not connected to water or septic. This type of housing will continue to increase as multiple employers are offering this lodging option to employees.



A different kind of housing needed as we age

The Comp Plan does not take into consideration the changing housing needs of a population as it ages. The County is attractive to retired people. As we age, it becomes more difficult to take care of our property; many want to stay on the islands but move into a home that is single level and has no maintenance. There are very few of these types of homes available, even though I believe there is significant demand for them. Graphic 5 takes into consideration our mortality as we age.

Graphic 5



One option is to accommodate the desire, by many in this age group, to "age in place" on the islands but in a downsized, single-level, no-maintenance home in close proximity to help, if needed. Under this option, there would be an increase in population as a new home would be built and the older resident stays on island while a younger person occupies the former home.

The other option is to not provide a place where such homes can be built. Most of this group will, then, move to the mainland where there is easier access to healthcare. The occupants of

the homes will be replaced with younger and healthier people. Under this option, there may still be an increase in the population, if the replacement family is larger; but, the growth will be less than under the first scenario.

What should we, as a community, do? How should the Planning Commission plan for the next 20 years? Within the next 10, this age group will double. The housing needs of this group should be a part of the DCD and Planning Commission discussion and integrated into the Comp Plan.

Law changes

The State of Washington passed [new legislation in 2021](#) that makes significant changes to what the Comp Plan must consider.

The new law adds, in part, the following:

(2)(b) Includes a statement of goals, policies, objectives, and mandatory provisions for the preservation, improvement, and development of housing, including single-family residences, and within an urban growth area boundary, moderate density housing options including but not limited to, duplexes, triplexes, and townhomes;

(c) Identifies 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;

(d) Makes 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;

(iii) Consideration of housing locations in relation to employment location; and

(iv) Consideration of the role of accessory dwelling units in meeting housing needs.

And the definition of Moderate-income is:

(18) "Moderate-income household" means a single person, family, or unrelated persons living together whose adjusted income is at or below 120 percent of the median household income adjusted for household size, for the county where the household is located, as reported by the United States department of housing and urban development.

The new law requires the Comp Plan to do some things that it doesn't do now. Namely, it requires us to consider the role of ADUs and to "make adequate provisions for existing and

projected needs of all economic segments of the community." It specifically requires attention to those who have incomes below 120% of the median income:

Household income of \$76,346 - varies depending on household size.

Individual income of \$39,859.

ADU History

The law passed in 2021 requires the County to reconsider its position regarding ADUs.

One of the primary reasons for the shortage of LT rentals is the decision by the County Council in 2006 to prohibit most accessory dwelling units (ADUs) outside of the UGAs. Prior to that date, many people would buy a lot and place a small cabin on the property while they built their main house. Then, when they moved into the new home, the cabin became an ADU that would be used for a caretaker, as a mother-in-law apartment, or a place for a long-term rental.

That practice was challenged, and it was argued that allowing ADUs permitted double the density and, hence, more population than was desired. [Here is a link to some of the negotiations](#). The Hearing Examiner agreed with prohibiting most ADUs outside of the UGAs. The [County appealed](#) the Hearing Examiner's decision to the Court of Appeals. Before the Court ruled on the case, there was an election that resulted in all of the elected County Council members feeling that a limit on ADUs was necessary. The County Council decided to withdraw the Court appeal, and the Court of Appeals never ruled on the question. The County opted to accept the prohibition of most ADUs in the County. Now, a lottery system allows a few ADUs each year.

Graphic 6

Year	Permit Requests	Number of new ADUs allowed via lottery
2018	15	10
2019	11	9
2020	13	6
2021	10	8

The number of LT rentals began a steady decline after that decision, especially on Orcas Island. The Comp Plan encourages new buildings to be placed in the UGAs and requires new multifamily units to be in the UGAs. This increased the value of UGA property. Combine that with lot coverage rules, building height restrictions, set back requirements, and parking requirements, and it became uneconomical to build LT rentals. As a result, very few LT rentals have been built outside of Friday Harbor since 2006. Instead, there has been a decline in the

number of LT rentals as people have found it to be less expensive to purchase an existing rental and convert it into an owner-occupied home than it is to build new.

The reason for the shortage of LT rentals is the result of a number of decisions that have been made over the last couple of decades. It has been the goal of some to limit population growth by limiting where housing can be built and to create regulations that increase the cost of building.

These are policy choices that the community has made. The Comp Plan is how these choices are made into policy. We may decide that it is best to continue those policies and to continue to limit the number of LT rentals in order to manage population growth. If we do, then we choose to accept the Comp Plan as it is now. Should we do that, then the response to a complaint about the affordability or availability of housing should simply be that it is the preference of the community.

Or, we might decide that we need and want more LT rentals; and, if we do, then we need to decide how many we want and where we want to allow them. Do we want them concentrated in the UGAs in the form of apartments and/or parks of some type? Or, do we prefer them distributed across the islands on parcels that already have homes? Should this be our choice, then the Comp Plan will need to be modified from its current form. We will also need to modify the methods used to calculate needs and to correct the significantly inaccurate land capacity analysis map that is being used for the Eastsound UGA (see below).

Our current policies don't shut the door on new growth. They just shut the door for the non-wealthy. LT rentals are literally the only housing option for most of our island's workforce. By choosing to ignore or not plan for this specific housing type, decision makers are not adequately planning for all economic segments of our County. Simply saying that there is land to be developed while ignoring the cost of the land or the cost of development is not enough.

Data relevant to housing

I share a series of graphics that I hope will help us understand the data and make good decisions. The County population pyramid resembles an elderly, but balanced, ratio of ages. When we look at the individual islands, we can see some things that affect the housing needs of each island differently. These graphics do not include the 2020 census data or the filling of many of the seasonal homes due to COVID. These images will need to be recreated after the 2020 data is released around September 2021.

[Population pyramids by Island](#)

Eastsound UGA map accuracy

The DCD has provided the Orcas Island EPRC with a map showing the land capacity analysis. This can be seen at [Second Draft LCA Inventory \(arcgis.com\)](#). The following map (Graphic 7) shows in purple the parcels that the DCD reports as vacant and available to be developed but currently have occupants or are obstructed such that the parcel is very unlikely to ever be developed with more residents than are currently present.

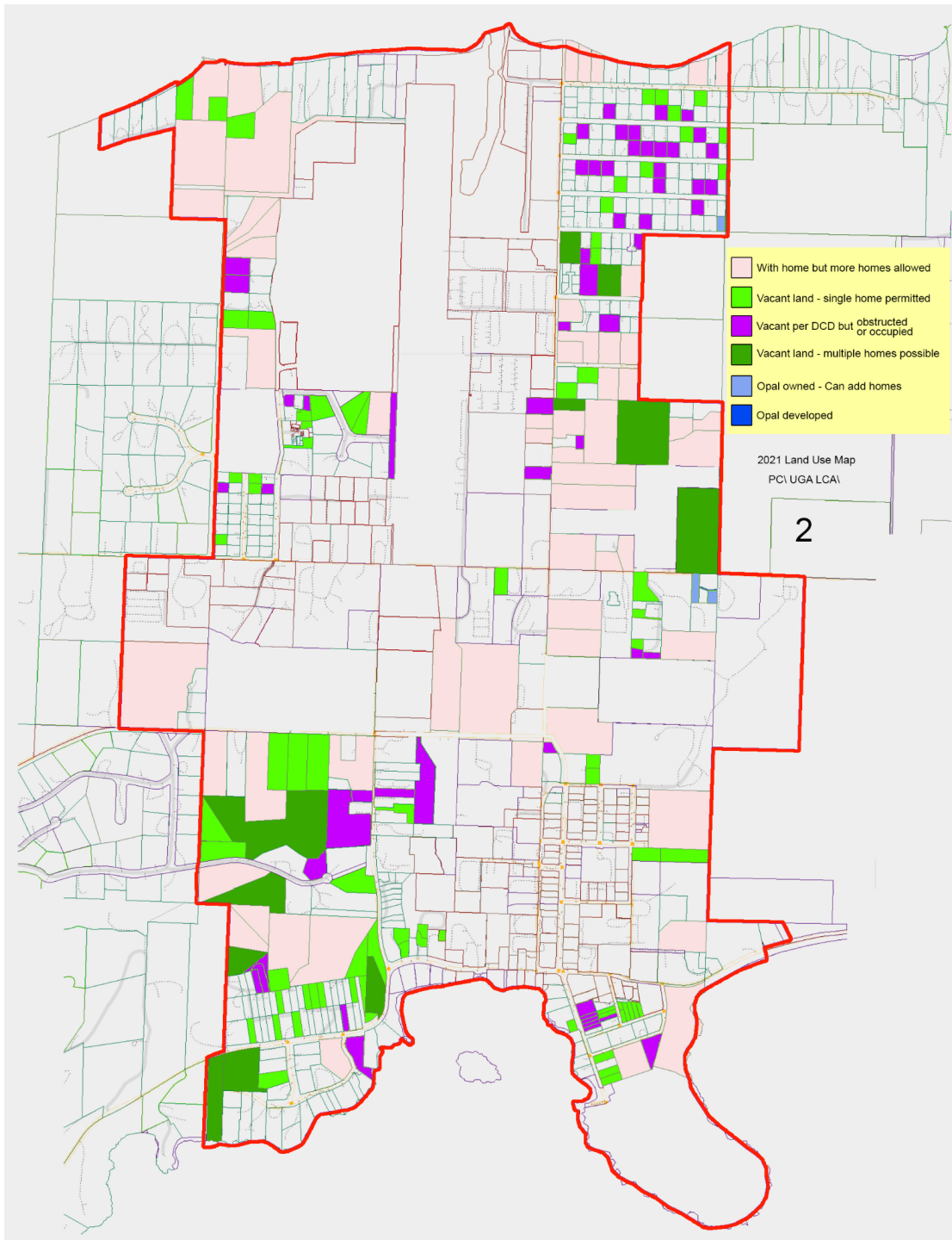
The inaccuracy of the DCD-provided analysis is large enough that the LCA inventory needs to be updated. If this does not happen, then the Comp Plan will fail to provide sufficient land to meet the affordable housing needs of Orcas Island.

The DCD reports a projected need by 2036 of 252 additional housing units of all types. The EPRC projects a capacity within the UGA of 230 additional units. Neither the DCD nor the EPRC have considered adding the replacement LT rental units of 139 that were lost since 2010 or the 237 that it would take to bring parity with 2010. Nor have either the DCD or the EPRC considered the number of rental units that must be placed in the UGA by 2036, if current regulations remain in place. Current regulations prohibit the placement of most LT rentals outside of the UGA.

If 252 additional housing units are built in the UGA, as is planned for by the DCD, then all of the green-colored parcels will need to be fully developed and about half of the pink parcels will need to be subdivided and developed. It is assumed that, over the next 20 years, at least half of the owners of those properties and all of the owners of the larger parcels will either develop or will sell to someone who will develop the properties. The DCD projections do not include the replacement of the 139 lost LT rental units since 2010. If we were to place all of the needed LT rental units in the UGA, then many green and pink parcels would need to be subdivided and developed. As the available supply of land dwindles, the cost of land in the UGA will continue to increase, making it even more difficult to solve the affordable housing issues.

In other words, the policies that we make in the Comp Plan have a direct influence on LT rental housing availability and whether the rental issues get better or worse.

Graphic 7



The DCD reports that the Eastsound UGA has the ability to hold 1,363 additional residential units under the current density allowances and if every colored block was built out to the maximum possible. It is planning for about 250 residential units to be added by 2036. There needs to be 237 more LT rental units in the UGA now to return us to parity with 2010.

Graphic 8

	Orcas	SJI Rural	SJI FH	Lopez
Gross Residential Capacity	3,180	1,541		916
Planned New Year-round Residential Units by 2036	514	365	365	230
Remaining Developable Capacity	2,666	1,176		686
Listed as residential units. Capacity assumes every parcel is subdivided and built out to its maximum allowed density. Source: DCD LCA report second draft. The Practical Capacity is how many units the DCD considers as the most units that might reasonably be built.				
Practical Capacity 70% of Max	2,226	1,078		641

Responsibility

San Juan County is a desirable location for many people to live. The Planning Commission has the responsibility of advising the County Council on how to limit too much growth while meeting the needs of those who work here and who have spent much of their lives here.

To do that well, the Planning Commission needs good data. It needs to know the will of an informed community. It needs to consider the long-term consequences of various actions.

Our Options

1. **Limit growth** - Make it a priority to limit the growth of the County population as much as possible.
2. **Allow moderate growth** - Make it a priority to address the demands for:
 1. Full-time workforce housing
 2. Seasonal workforce housing
 3. Single-level, no-maintenance homes for those wanting to downsize.

If this option is chosen, then decide how many units are needed, what form they would be allowed to take, and where they will be allowed.

3. **Permit unregulated growth**

Once one of the three options is chosen, there are many additional choices that will need to be made.

The **Limited Growth** option

The limited growth option tries to limit population growth as much as possible. Many think that we continue to grow too much now. There are several organized groups that work to limit population growth and one that has filed suit against the County.

Current policies:

- Prohibit almost all ADU (caretaker/mother-in-law) units outside of the UGAs.
- Mobile home parks are not allowed anywhere in the County.
- RV parks are not allowed anywhere in the County.
- Prohibit new multifamily units outside of the activity centers (Friday Harbor, Eastsound, Lopez Village, hamlets, and the resorts, Rosario and Roche Harbor).

The limited growth option proponents argue that we should add additional regulations that will further limit the availability of housing.

The arguments to limit growth as much as possible are:

1. We are at our capacity on the number of people. We do not have the resources (water, ferries, food, energy, roads, parking) to support additional people.
2. Any additional people will hurt the environment too much.
3. The rural character will be lost if we allow population growth.
4. The community has already changed too much.

The counter-arguments are:

1. We need homes for our workers. Many essential businesses cannot find workers because of the current policies. The cost of many basic services are very high due to the significant housing costs associated with the limited employee availability.
2. More damage is done to the environment when people live in unpermitted and unsanitary conditions than if there were enough homes with proper sanitation.
3. The rural character can be preserved by choosing locations for new homes that do not interfere with the open vistas that people value.
4. The resources exist.
5. The current policies that limit growth have caused the lack of LT rentals and shortage of housing for employees.
6. Limiting multifamily units to the most expensive land on the islands and limiting the lot coverage and numerous other regulations makes building new apartments uneconomical. It is why very few have been built outside of Friday Harbor, which has a different government with regulations that are more friendly to affordable housing.

The **Moderate Growth** option

The moderate growth option tries to limit population growth while creating affordable housing options for those who work on the island and who have been here for many years.

The proponents of moderate growth argue that, in order to create affordable housing options, some or all of the following need to happen:

1. We need housing for workers.
2. We need housing for LT renters.
3. Essential services are unavailable due to a lack of housing.
4. Many are living in unsanitary shelters due to a lack of housing.
5. The environment suffers because of the unsanitary shelter options chosen by those who are desperate for housing.
6. The prohibition on ADUs (caretaker/mother-in-law) outside of the UGA should be eased or removed.
7. Each island should be allowed to have a mobile home park. State law requires that these be within a UGA or activity center.
8. Each island should be allowed to have an RV park. State law requires that these be within a UGA or activity center.
9. Expand the UGAs to provide locations where multifamily units can be built in sufficient numbers to provide housing for the employers who need housing for their employees.

The counter-arguments are:

1. These changes would ruin the rural character of our community.
2. There is no way to restrict housing to just workers; so, anything we build will be bought by non-locals and we end up increasing the population without solving the worker-housing problem.
3. If the businesses just paid their workers more, the workers could afford to buy or rent. Employers just need to pay a living wage, and the housing problem will be fixed.
4. The environment cannot support any additional people. The parks are already overrun. We don't have enough water. There isn't enough room on the ferries.
5. Dense, low-cost housing such as mobile homes, RVs, and tiny homes often become slums.

Public Engagement

The housing issues touch the lives of every resident and many of those who want to live here. As planners, we want to hear from everyone; but, we usually only hear from the most vocal. We hold town halls to solicit comments, and they are very important; but, no matter how many we hold or how long they last, we still only hear from a small fraction of the residents.

I believe that it is important for the Council, the DCD, and the Planning Commissioners to hear from everyone who is willing to give an opinion. The only practical way to do that is to have the Planning Commission and DCD frame a set of questions and, then, ask the community via a survey for their response.

Surveys are controversial because so many of them are biased and poorly done. However, we have available to us professional public opinion surveyors who are willing to donate their time. The Commission and the DCD can frame the questions, review the survey to eliminate bias from the questions and possible answer options, and then engage the professionals to conduct a representative survey. A representative survey is one where a random representative sample of the community is taken. The Commission, DCD, and Council would be welcome to review the methods used. The overall purpose is to solicit public participation from everyone who is willing and do so in such a way it is manageable and meaningful.

In short, I think we want to ask the community if they want there to be more housing for those who work on the islands and who have lived here many years or if we prefer to limit all growth as much as possible. Should the community decide that it wants more housing, then ask if the community prefers new housing to be clustered in the UGAs or distributed across the islands.

Many activists tell us that they speak for the community. A professionally-done survey would let the community tell us themselves.

This is a link to a possible survey set of questions that the planners may find helpful. It is a very rough draft. The Council, DCD, and Planning Commission would make significant modifications.

The purpose of the survey is:

1. To determine if people want as many rental houses as we had in 2010?
2. If so, where? Do we want them to be clustered or distributed or both?
3. If clustered, in what form? Mobile homes, apartments, tiny homes, etc.

[Rough draft of a potential community survey](#) - how it might look to the public
[Rough draft of a potential community survey](#) - In an editable format

Proposals

These are the things I think the County Council should do and that I will ask the Commission to recommend to the Council:

1. The Planning Commission recommends to the County Council that it instructs the DCD and the Planning Commission to add the number of lost LT rentals since 2010 in the formulas that determine the projected housing needs.
2. The Planning Commission recommends to the County Council that it instructs the DCD and the Planning Commission to consider setting a target percentage that LT rentals should be of the total housing stock of each island and to add that number as a part of the population trends that are used to project needs.
3. The Planning Commission recommends to the County Council that it instructs the DCD and the Planning Commission to obtain estimates of employer housing needs for their employees and to integrate both the year-round and seasonal housing needs into the 20-year Comp Plan projections.
4. The Planning Commission recommends to the County Council that it instructs the DCD and the Planning Commission to conduct a representative survey of the community to determine the desires of the community:
 - a. On limiting growth or allowing enough growth to accommodate the needs of workers.
 - b. If the community desires worker housing, to determine if it prefers that to be:
 - i. Concentrated in the UGAs
 - ii. Dispersed across the islands
 - iii. Both
5. The Planning Commission recommends to the County Council that it instructs the DCD and the Planning Commission to solicit feedback from all organizational stakeholders regarding the aforementioned questions.
6. The Planning Commission recommends to the County Council that it instructs the DCD and the Planning Commission to engage an outside consultant to assist with the representative survey under the direction of the DCD and Planning Commission.
7. The Planning Commission recommends to the County Council that it instructs the DCD and the Planning Commission to analyze the needs of the aging population who want a single-level, no-maintenance, close-to-help home as well as to determine what, if anything, the County should do to accommodate this group.
8. The Planning Commission recommends to the County Council that it instructs the DCD to update the Eastsound UGA map to accurately reflect the parcels that could be developed if the owner wanted that to happen. Instruct the Planning Commission to review the UGA needs of Orcas Island in light of the corrected map, once that is available.