



September 15, 2022

Dear Planning Commission,

Regarding changes to land use maps, Eastsound Planning and Review Committee wishes to thank the Planning Commission and the Department of Community Development for taking EPRC's community outreach and recommendations seriously. Your significant support of our efforts to infill with greater density in Eastsound locations that have the existing infrastructure to accommodate growth and far-sighted planning to insulate and improve the quality of life in Eastsound's residential and mixed-use areas cannot be overstated.

As a brief recap of our assessments, we wholeheartedly support Staff's recommendations on the Enchanted Forest parcels EDCA-2. On EDCA-1 we recommend increasing density to VRI 12 units per acre on 271144008000 and 271144017000 rather than on the larger block of parcels because:

1. The two 5-acre parcels to the north are likely to remain the extended family parcels they are today and would only add traffic to North Beach Road which is the only road in or out serving a bustling residential neighborhood, a marina, airplane hangars, the sewage plant, storage units, a vacation resort, and several commercial lodging establishments. We need a transportation plan before adding more traffic on this very busy road.
2. Packing in more density onto North Beach Road without constructing an alternative exit via Bartel/Terrill Beach Road or Bartel/Mount Baker Road would be unwise.
3. OPAL tells us they have no intention of adding any residences to Oberon Wood or Wild Rose Meadow and have promised the residence that no further development will occur ever.
4. If you decide to add more density to this area, please consider the parcel in green to the right below, which has egress to Mount Baker Road, and the owner, Fred Klein, has told EPRC he wishes to sell it for development. Please see the map of EDCA-1 below:

Also,

According to the Map 2a. Proposed 2036 Comprehensive Plan Official Map Changes: Orcas Island Redesignate these parcels from ER4P to VR4-12 PC will make a recommendation at the Comprehensive Plan maps public hearing. Staff recommends redesignating all the considered parcels. EPRC recommends redesignating only parcels 271144008000 and 271144017000.

There currently is no VR4-12 land use district. So did staff mean VRI (Village Residential/Institutional 4-12 or Eastsound Residential 4-12. EPRC recommends only the two parcels VRI. Changing all the considered parcel to VRI 4-12 would be a horrible mistake. Is staff recommending the creation of another land use district called VR4-12?



Regarding other ways to increase density, please also consider that EPRC will be working with Staff to update the Eastsound Sub Area Plan immediately after the Comprehensive Plan is completed. Additional density will be added if the following 6 recommendations are implemented in this update. They are:

**In Village Commercial land use designation–**

1. We recommend establishing a maximum building setback of 5 feet from the public right of way, granting up to a 20 feet setback only if area for public gathering/use is allowed in front of the building.
2. We recommend requiring parking in the rear or side of the lot - or in the middle third of the lot if the lot faces two public rights of way in between two streets. No private parking in front of buildings.
3. We recommend establishing a minimum lot size of 1/8<sup>th</sup> acre. This is to prevent the miniscule lots such as have been created recently which prevent changes in use over time, relegating those tiny lots to be residential forever.
4. We recommend removing single family residence as an allowable use. Duplexes, multi-use, multi-family and commercial would remain as allowable uses. This would prevent the trend of new single-family homes occupying the most valuable and usable commercial lots in the very center of town.
5. We recommend increasing the minimum density from 4 to 16. This means that on a typical 1/8<sup>th</sup> acre lot in VC, 2 dwellings or a duplex would be the minimum density.

**Village Residential Institutional Density and Affordable Housing-**

1. We recommend allowing one ADU per residence in Village Residential Institutional land use designation only with the stipulation that they should not be used as vacation rentals. This will increase the availability of long-term rental space very near the center of town.

Sincerely,

EPRC Members, Leith Templin, Charles Toxey, Terry Gillespie, Brian Wiese, Scott Lancaster, Brynna Gregg

## **EPRC Response to San Juan County Staff's requested feedback on possible Eastsound Subarea and UGA Changes**

- A. **Comment - Density Goal:** The Land Capacity Analysis (LCA) found that the UGA has “between a 446-person excess and 13-person shortfall of residential capacity depending on how mixed-use areas develop.” A thirteen-person shortfall is a small number which could be met by a very small increase of density in a small area. We also know from historical data that although 50% is the GMA goal, more like 25-30% of residential development happens in the UGA, not because there wasn't capacity in the UGA, but because most people who move to Orcas Island choose to live in more rural areas. So, we want to be conservative about where we increase density and do it only to the extent needed to provide a small cushion for the 50% goal with the knowledge that it is very unlikely that the actual build-out remotely would approach 50%. In accordance with goals of maintaining a compact, walkable village center and providing affordable, year-round housing, the EPRC advocates first increasing infill density to the extent possible, within the village center. The increased density EPRC has recommended in VC by increasing the minimum density in VC to 16 per acre already goes a long way toward achieving this. Just changing the land use of the parcels on the northwest corner of Mount Baker and North Beach to VRI would make up the 13-person deficit adding 23+ units/47.45 persons minus the Market factor. Also, April's Grove coming on line just provided a huge chunk of the housing needed to accommodate the projected growth.
- B. **Comment – Plan So Neighbors Face the Same Land Use and/or Density** - A planning best practice we would like to pursue is not to draw land use boundaries along roads, but instead to divide zones one parcel back from the street. Having one kind of density or land use on one side of the street and a higher density or different use on the other makes for unhappy neighbors. We support drawing new

boundaries so that VRI faces VRI, VC faces VC, ER4 faces ER4 across the street whenever possible.

Examples:

- Village Commercial parcels facing each other across Main Street, Prune Alley, North Beach
- VRI parcels across from each other on Haven
- The remaining Eastsound Residential parcels facing each other across North Beach Road

## **Regarding Changes in Land Use Designation Standards:**

### **1) Changes to density in SLI:**

- a. Increase Lot Coverage in SLI – We fully support this recommendation.
- b. Decrease Setbacks in SLI – We do not support this recommendation. - As an Eastsound UGA goal, where residential land and industrial land come in contact, EPRC is actively looking for ways to reduce building proximity, provide sound and visual screening, and to buffer & protect residences from industrial encroachment on residential areas. We seek to increase both residential and industrial densities where they are farthest apart from one another. As a planning best practice planned buffering makes for good neighbors and higher property values. Visual screening and deeper setbacks are hallmarks of good intersections between industrial uses and residential uses. Increasing the lot coverage in SLI makes perfect sense as long as we retain full dense vegetative screening and setbacks are maintained between land uses and facing the street. If a parcel does not border a property with either existing or potential residential uses or is not across the street from such uses, then the setbacks and screening could be reduced. We consider the fact that Marina has smaller setbacks than SLI to be valid because Marina has residential uses as one of its primary uses, and all developments in Marina facing public streets are in fact conforming residential/lodging. So, there is no negative impact to the streetscape or the Eastsound

Residential properties across the street from what is simply more residential architecture in Marina. Industrial sites and warehouses, however, have a negative visual impact for residences and an impact on the streetscapes which are heavily travelled by local and tourist pedestrians, cyclists, and passenger vehicles. Existing setbacks should be kept. Vegetative screening should be kept or perhaps even enhanced for fuller visual separation.

- 2) **Add Industrial Capacity to Service Park Areas**– The service park parcels north of Maidenhair Lane including 271350005000 are poised for further development in a multi stage plan which is laying the groundwork for more lot coverage than currently allowed in Service Park. Since there is active development in this land use and a desire on the part of property owners to expand, please consider expanding lot coverage and non-noisy allowed uses to alleviate some of the needs currently being met in Service and Light Industrial.

## **Regarding Changes to Land Use Designation Boundaries**

- 1) **Candidate Area 2** - We support this recommendation. The parcels on Enchanted Forrest Road across from Bonnie Brae are perfect for the modest increase from 1 to 4 units per acre. Increasing density on any land that can access Mount Baker and Enchanted Forrest makes much more sense than creating more density which has to travel on the congested cul-de-sac of the North Beach Road neighborhood.
- 2) **Candidate Area 1** We support the conversion of the two parcels 271144008000 and 271144017000 on the corner of the Mount Baker North Beach intersection whose owners requested be changed to VRI-12. Going beyond that does not seem to be warranted to meet the density goal. We asked OPAL director Lisa Byers if OPAL would consider adding housing to the Wildrose Meadow or Oberon housing areas if they were upzoned, and she said no. So, there is no benefit to adding capacity there. If adding the density of the Candidate Area 2 parcels and the two parcels on the NE corner of North Beach / Mt. Baker Rd. intersection is not enough to meet and exceed the LCA requirements by a comfortable margin as we believe it does, then we would consider recommending extending VRI-12 to the 5-acre Mount Baker Road parcel (Klein) across from the medical center, but that does not seem necessary at this time.

3) **Candidate Area 3** – We don't support increasing density in this area and think it would be a significant mistake to relegate any of our existing traditional suburban street communities to 12 per acre development. This is what is happening in residential areas in lots of suburban neighborhoods where suddenly an 8-plex gets sandwiched in between two houses on a residential street. The value of existing built improvements drops as the land value increases and those owners increasingly over time can only sell to someone who will tear down the house to put up a complex. This is unnecessary, and creates a poorly-planned street appearance of house-complex-house-complex for decades. In addition, the calculated net gain of residential units is not sufficient to justify the rezoning. We want to increase density where dense multi-unit developments create their own new complex or neighborhood such as April's Grove and not cannibalize the older neighborhoods. VRI-12 for the Christmas parcels is perfect for this. Luckily, there are several parcels that would fulfill this goal if needed.

## **Regarding the Land Use Change Requests**

**A) Split zoned Port of Orcas Parcel 271143016000** – Iterations of the EPRC for years have sought to keep the residential parcels on west side of North Beach Road as intact as possible with a buffer of SLI between the Eastsound Residential land uses and the airport (which is written in the Eastsound Subarea Plan Goals). The Port's decision to use FAA funds to buy the split-zoned parcel with its ER zone on North Beach Road has put San Juan County and Eastsound in a difficult position as the FAA will not permit the Port to develop non-airport residential uses on land they paid for. We understand that they would like more SLI space, but not at the expense of the residential areas which line the entrance to the North Beach neighborhood. EPRC would greatly prefer to:

- a. Leave it as a split zoned parcel. The Port may simply choose not to develop that portion of the lot or build airport use housing on it.
- b. If the split zone must be resolved, then create two distinct parcels from the one, keeping the land uses the same. Again, the Port

could develop that lot or not, or could sell it and reimburse the FAA. The County has the authority to require either of these first two scenarios with the use of the land at the Port's discretion.

- c. If the County disagrees and makes this one whole SLI parcel abutting North Beach, we must get the 60-foot set back with landscaping/vegetative screening buffer which the Port of Orcas agreed to and which is shown on the Airport Master Plan, written as a deed restriction - a permanent setback from the property line (not the center of the ROW) that runs with the land. Also, the Port changed its master plan to reflect keeping the entrance(s) to the airport on Mount Baker Road and not onto North Beach Road. The Port of Orcas manager, Tony Simpson, and the Commissioners agreed to this, and it is depicted in the Airport Master Plan, but a new manager and several new commissioners reduces the certainty of this promise. Please do not grant the SLI change to this parcel without completing these vital steps.

**B) Klein Bartel Road Parcel** –No demonstrated need to expand the UGA. The slight shortfall of residential capacity in the UGA can be addressed through infill. Adding more undeveloped land to the UGA is not necessary to accommodate the projected population. Without a new road, adding that many new residents to the already busy traffic on North Beach Road would add to a growing problem. We recommend opening up Bartel Road as a public road through to Terrill Beach Road so that in the future when additional capacity is needed adding density to this area may be appropriate.

**C) The Nexco Airport Center** - Eastsound is limited in land for service and light industrial uses. Also, this is in Zone 5 of the Airport Accident Safety Zone. As stated in San Juan County Code in regulations related to the Sideline Safety Zone/Airport Development Zone (Zone 5) "5. Except as necessary and incidental to airport operations, the following uses that require or promote the concentration of people or have substantial occupancy by dependent populations (such as children, sick, or the elderly) are prohibited: schools, libraries, hospitals, nursing homes, day care centers, multifamily housing, playfields, public meeting rooms, public assembly uses, churches and religious assembly uses, restaurants, motels and hotels." Restaurants are places of public assembly. We don't recommend supporting this request.

- D) Fishing Bay Short Plat** – Adding these parcels does not add functionality to the UGA, and they are unlikely to be built out to add much additional density. We don't recommend supporting this request.
- E) Christmas Parcels** 271144008000 and 271144017000 – This adds needed density and matches the VRI designations across the street. We are, however, concerned about possibly even more vehicular traffic going onto the already very congested flow of vehicle, foot and bicycle traffic from North Beach to town and back. We understand a traffic study was done in September. Were entrances and exits for these parcels addressed? If not, we ask for further traffic study to consider entrances/exits on Mount Baker to keep from impacting the significant pedestrian and bicycle traffic going primarily up and down North Beach Road, enabling an easy walk or bike connection to town from the North Beach residential neighborhoods. The pedestrian traffic on either side of Mount Baker is significantly less. Also, if a roundabout has been considered at the Mount Baker-North Beach intersection, please establish what additional setbacks would be necessary and plan for obtaining deeded setbacks and screening on both the Port of Orcas parcel 271143016000 and the Christmas parcel 271144008000 as a contingency for granting these land use changes. We are also amenable to adding turn lanes at this intersection to alleviate traffic.

## **EPRC Recommends the Following Which affects Development Patterns and Density in the UGA**

In Village Commercial land use designation–

1. We recommend establishing a minimum setback of 5 feet from the right of way, granting up to a 20 feet setback only if area for public gathering/use is allowed in front of the building.
2. We recommend requiring parking in the rear or side of the lot - or in the middle third of the lot if the lot faces two public rights of way in between two streets. No private parking in front of buildings.
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4. We recommend removing single family residence as an allowable use. Duplexes, multi-use, multi-family and commercial would remain as allowable uses. This would prevent the trend of new single family homes occupying the most valuable and usable commercial lots in the very center of town.
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