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From: Breton LCLT Assistant Director <lclt25@rockisland.com>
Sent: Wednesday, November 16, 2022 2:54 PM
To: Comp Plan Update
Subject: Comp Plan Review -- Housing
Attachments: Breton's Review of SECTION B ELEMENT 5 HOUSING .pdf

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Hello,

I have read the Current Draft of the San Juan County Comprehensive Plan Update Section B Element 5 on Housing. Thank you for all of the hard work on putting this together. There are many areas I really appreciate that are included, and a few areas that I have questions and comments on. I especially want to show appreciation that there has been an emphasis on the fact that the housing challenge is not necessarily due to a lack of housing units, but the lack of units available for year-round residents to purchase or rent affordably. This is an important point that is often overlooked when considering affordable housing. Attached, I have highlighted specific sections and written in my questions, concerns or suggested changes. I hope they will be taken into consideration. For some background, I am a 27-year old woman who grew up on Lopez Island, I work at the Lopez Community Land Trust and have lived experience with substandard and unusual living situations. Please reach out if you have any questions.

All my best,

Breton Carter
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Breton Carter
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SECTION B ELEMENT 5 HOUSING – Comments by Breton Carter

5.4 Housing Projections and Inventory

Housing Condition

“According to the local family resource centers, there has been an increase in the number of families living in substandard housing with poor conditions such as trailers or recreational vehicles [...] Also, the largest percentage of respondents in the County’s 2017 Point in Time Homeless Count were those living in substandard structures.”

Throughout the plan, I would like to see more to address this issue, as substandard structures are also some of the only affordable housing options in the islands. How can these kinds of homes be brought into compliance in an affordable way? I would like to reiterate the importance of the county not actively seeking out penalizing those in this kind of situation (and maintaining the current complaint driven basis).

5.6 Key Issues & Challenges

Housing Availability.

The last sentence states **“Eighty-one percent of all vacant homes were either used for occasional, seasonal, or recreational purposes, and were only occupied part of the year by their owners or as vacation rentals.”**

I would like to know -- What is the remaining 19% estimated to be used for? Are these houses just abandoned?

Section 5.7.A General Housing Inventory, Types, Categories, and Condition

Section 5.7.A Policies

1. “Incentivize the construction of multi-family and mixed-use development”

I wonder -- How do you incentivize the construction of multi-family and mixed-use developments? For an organization like LCLT, there is very little incentive because part of the affordable building in our model is based on the sweat equity contributed by homeowners. To date, insurance companies prohibit sweat equity participation on shared-wall developments.

Section 5.7.A Goal 1 Policies

3. “Increase the availability of rentals for workers. Develop specific standards and create incentives for seasonal and year-round worker housing such as dorms, bunkhouses, hostels, group homes, home shares, farmworker housing and other communal living arrangements.”

While I think that there is a need for multiple avenues and streams of creating affordable housing options, I also have some concern in how “worker housing” is developed or described. Developing primarily for seasonal workers risks diminishing building a well-rounded, diverse and thriving community. Housing developed based on the work someone performs also risks minimizing who that person is, how they benefit the community beyond the things they do for pay, and encouraging solely a service-based community where “low-income workers” are here for the purpose of serving the wealthy who can afford to buy a home. This section focused on increasing the availability of rentals for workers, could rather encourage increasing stable housing to create “prosperous, healthy communities, thriving children, and economic development. [To] sustain a year-round community” as stated in the Key Challenges section earlier in the report. Is worker-specific housing at odds with this goal of developing stable housing? Sometimes worker housing is tied to employment creating unbalanced situations for the tenant.

Additionally, this could be an area to follow through on the Housing Element that ties to other elements in the report. The beginning of this document states, that it “relies on the Economic Development Element’s vision of stable jobs that “provide wages that allow islanders to live, work and thrive locally,” and is an important contributing factor to a diverse and resilient economy.” If you keep Policy 3 as is, I encourage adding a line to incentivize increased wages so people can move from rentals to homeownership if they so desire.

Section 5.7.A Goal 1 Policies

5. “Continue to monitor and gather data on short term vacation rentals...”

This section is currently crossed out, but I think is worthwhile to include. Is it crossed out because it is already monitored elsewhere? While there are now vacation rental caps in place, it would be worthwhile to monitor how the limits impact the community.

Section 5.7.A Goal 1 Policies

6. “Consider options for inclusion of small home parks and RV parks across the county for long term housing needs”

I would like to see stronger language than “consider.”

Section 5.7.A Goal 2: Address the housing needs of special populations such as veterans, the elderly [...]"

I am curious, how and where is special populations defined? San Juan County has a high proportion of people over 60 years of age and the median age is 54 (as indicated under the Age section of this report). There's a difference between vulnerable populations / vulnerable elderly, and those who have all they need (and may be older).

Section 5.7.A Goal 2 Policies

1. "Assure there are appropriate regulations and land use designations to allow housing to meet the needs of the elderly population..." The elder care facilities on the island are incredibly important and valuable, many do great work on the island. I wonder how this policy will be balanced with the increasingly aging population, and the ability of a younger population to find a home to live in to be able to care for them and provide medical or emergency services?

Section 5.7.A Goal 2 Policies

5. "Promote the development of new housing opportunities for vulnerable populations such as safe homes for domestic violence victims, transitional housing for the recently homeless, and the host home program for at-risk youth and youth experiencing emergencies." Please add chronically homeless to this.

Section 5.7.A Goal 3: Improve housing condition and reduce the number of substandard housing units.

Section 5.7.A Goal 3 Policies

1. "Utilize all available resources to complete weatherization upgrades and provide energy assistance."

Why was this removed? I think it still has importance.

Section 5.7.A Goal 3 Policies

3. "Review and revise permit process for home remodels to ensure compliance with State lead regulations and reduce the risk of exposure"

Generally -- what is the plan for unpermitted dwellings to raise the quality and safety of currently substandard housing? Improving substandard housing impacts most all affordable housing. As part of reviewing and revising the permit process, clear steps for how to get unpermitted structures into code compliance, while providing or maintaining affordable avenues will be an incredibly important stream of affordable housing options. There are homes in San Juan County that either were built without a permit, or the final occupancy was not granted. I think it is fair to assume that many of these homes are owned by an increasingly aging population (perhaps folks who were younger when they moved to the island and built their own home on land, over time, and now are aging). For homes where this is the case, then they are not bankable, a future homeowner who might consider purchasing the property could not get a loan from the bank on an unpermitted structure/house. This means that only those who have the means to make a cash offer, or those who have access to private financing could purchase the home. They are likely to be wealthier, less likely to contribute to or already be part of the local workforce (due to the low wages), and might simply demolish the older structure. This compounds all of the affordable

housing issues at hand. Additionally, it is more environmentally costly to demolish an old home and build anew than to keep the existing structure. I would like to see this concern addressed in the comp plan.

Section 5.7.A Goal 4: Reduce the costs of maintaining existing homes and constructing new housing units.

Section 5.7.A Goal 4 Policies

3. “Continue the owner-builder permit program to enable County residents to construct their own homes.” I FULLY SUPPORT THIS. Additionally –advocate at the State level for the maximum expenditures by owner builders to be increased from the \$500 currently allowed.

Section 5.7.A Goal 4 Policies

5. Keep “Amend the San Juan County Unified Development Code and Building Code to better allow for the development of Tiny Houses and Tiny House Communities.” I FULLY SUPPORT THIS. And “Amend” is much stronger than “Consider.”

Section 5.7.A Goal 4 Policies

6. “Support tool lending libraries...” This is great. I also want to suggest consider developing micro-lending programs to loan funds to individuals to purchase their own tools directly.

Section 5.7.A Goal 4 Policies

7. “Provide information on environmentally responsible prefabricated building materials and encourage their use as a way for owner-builders to reduce construction costs.” I am curious to learn more about this and if it really does, or how it does reduce construction costs (oftentimes pre-fabricated materials increase costs).

Section 5.7.A Goal 5:

“Promote climate resiliency by minimizing the environmental impacts, such as greenhouse gas emissions, of the existing and future housing stock in San Juan County.”

I encourage doing so by incentivizing living small — make it less expensive to build on a smaller footprint and more expensive to build a larger home. The larger home environmental requirements should be more stringent to meet. Encouraging smaller building footprints should be more affordable and considered as another important way to promote climate resiliency. Additionally, it should be encouraged/incentivized to build high quality of homes that are going to last longer.

Section 5.7.A Goal 5 Policies

2. “Identify and support partners that work to increase the environmental sustainability of housing on the Islands by means such as reducing energy use, protecting critical areas, and mitigating climate change impacts.”

This can be balanced with incentivizing people to do so. Additionally, (as mentioned above) consider smaller / more affordable homes get more points for environmental sustainability in that

area, so require fewer points in another area that might be incredibly costly. Must balance affordable options with environmental sustainability

Section 5.7.A Goal 5 *Policies*

5. “Support working farms and farmland succession.”

I think this is important, and also seems out of place in this particular section. It would be useful to tie in how supporting working farms is part of supporting housing & the environment.

5.7 B Affordability

Goal 6: Increase the number of resale-restricted homeownership and rental affordable housing units.

Would it be worth considering encouraging individual households to put a covenant on their own home so that it is resale-restricted? Is that even possible?

5.7 B Affordability Goal 6 *Policies*

1. “Support applications to the WA State Housing Finance Commission Land Acquisition Program (LAP) for assistance in purchasing land for affordable housing development.”

This is great. I also think it is equally important (and vital for environmental stewardship) to support applications for assistance in purchasing PRE-EXISTING homes.

5.7 B Affordability Goal 7 *Policies*

8. “Explore and implement ways to better utilize Accessory Dwelling Units as long-term affordable housing.”

Hand-in-hand with this policy, I would like to see encouraging ways to incentivize those with primarily vacant homes to rent their home, or if they have them, rent their ADU or “mother-in-law” suite.