



Friends *of the* San Juans

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April 29 , 2022

San Juan County Planning Commission
135 Rhone Street
Friday Harbor, WA 98250
% David Williams, Director of Community Development, davidw@sanjuanco.com

Re: Proposed Revision of Table 18.030.040 Allowable and Prohibited Uses in the Rural, Resource, and Special Land Use Designations for Government Offices.
Comments for May 6, 2022 public hearing.

Dear Planning Commissioners:

I am writing with comments from Friends of the San Juans regarding the proposed Revision of Table 18.030.040 Allowable and Prohibited Uses in the Rural, Resource, and Special Land Use Designations for Government Offices. These comments are being submitted for consideration by the Planning Commission at the hearing to be held May 6, 2022.

We appreciate staff's stated goals of improving service delivery by public entities, better serving public interests in a cost-effective manner without contributing to sprawl, and reducing overall operating costs for vehicles, as well as maximizing efficient use of staff time. We also understand from the staff report and presentation to the Planning Commission on April 1, 2022, that the intended purpose of the proposed revisions is to allow co-locating government offices with emergency services facilities or other pre-existing government facilities.

Consideration of this proposal must be made while recognizing the importance of preserving rural, resource, and conservation lands. Once an office building is put on these parcels, they would permanently lose their rural, resource, or conservation value in those areas. Nonetheless, we agree that in some rare circumstances this type of co-location of facilities may be appropriate even in Rural, Resource, and Special Land Use parcels.

However, the proposed amendments are broader than needed to accomplish the stated goals. As proposed, the revisions would allow establishment of government offices in Rural, Resource, and Special Land Use areas regardless of whether they are, or are not, co-located with emergency services facilities or other pre-existing government facilities. Establishment of stand-alone government offices in these lands would be contrary to the stated goals of reducing

sprawl and increasing efficiency, and would violate the goals of the Comprehensive Plan and legal requirements of the Growth Management Act.

Friends proposes adding clarification to the staff’s draft amendments to Table 18.030.040, to specify (1) that government offices in these lands will only be allowed if co-located with emergency services facilities or other pre-existing government facilities, and (2) that establishment of government offices in these lands should only occur pursuant to a conditional use permit with a public hearing process.

The current table under Institutional Uses shows the following related to Emergency Services and Government Offices:

Table 18.30.040. Allowable and Prohibited Uses in Rural, Resource, and Special Land Use Designations^(1, 2, 3)

| Land Uses | Classification of Uses by Land Use Designation | | | | | | | | | |
|--------------------|------------------------------------------------|----|-----|----|----|----------------|-----|------------------------------|---|--|
| | Rural Designations | | | | | Resource Lands | | Special Lands ⁽⁴⁾ | | |
| | RGU | RR | RFF | RI | RC | AG | FOR | C | N | |
| Emergency services | Y | C | C | Y | Y | C | C | C | N | |
| Government offices | N | N | N | N | N | N | N | N | N | |

DCD Staff’s proposed language:

| | | | | | | | | | |
|--------------------|---|---|---|---|---|---|---|---|---|
| Government Offices | Y | C | C | Y | Y | C | C | C | N |
|--------------------|---|---|---|---|---|---|---|---|---|

Alternate language that better protects rural areas:

| | | | | | | | | | |
|--------------------|----|----|----|----|----|----|----|----|---|
| Government Offices | C* | C* | C* | C* | C* | C* | C* | C* | N |
|--------------------|----|----|----|----|----|----|----|----|---|

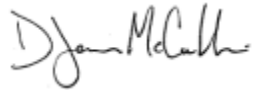
**** Government Offices are allowed in Rural Designations, Resource Lands, and Special Lands only when co-located with emergency services facilities or other pre-existing government facilities.***

This clarification will allow the uses contemplated and proposed by staff, while also ensuring that future development is not undertaken in a way that is inconsistent with the goals of reducing sprawl and increasing efficiency. Limiting these potential uses to conditional use

permits only will appropriately allow for public participation before rural, resource, or special lands are used for office buildings.

Thank you for your work on this matter and consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "D. James McCubbin". The signature is written in a cursive, slightly slanted style.

D. James McCubbin
Friends of the San Juans, Legal Director & Staff Attorney