

MEMORANDUM

DATE: March 15, 2025

TO: Ryan Ericson, Town of Friday Harbor – Ruta Bertulis, Town of Friday Harbor

FROM: Kamal Raslan, BERK Consulting – Lisa Grueter, BERK Consulting

RE: Housing Capacity & Adequate Provisions

Purpose

The purpose of this memo is to provide information and a range of recommendations to meet the Town's housing growth allocation by income level and present the updated land capacity estimates for housing based on these recommendations. BERK Consulting, Inc. (BERK) has conducted a secondary land capacity analysis for the Town of Friday Harbor to understand the Town's ability to meet its 2045 housing allocations and different scenarios to meet these allocations. This memo updates our initial memo dated June 27th, 2024.

The goals of this memo are to:

- Update the previous iteration of the Land Capacity Memo
- Determine housing capacity under current zoning with newer information from Town staff
- Provide options for increasing housing capacity in town limits
- Provide background on the potential urban growth area (UGA) expansion areas identified by BERK and Town staff and provide reasoning data to support some possible UGA expansions

Housing Capacity Update

This section presents an update of the Town's housing capacity. Parcel characteristics have been updated to reflect changes in capacity assumptions and new regulations governing the development of accessory dwelling units (ADUs) in the Single-Family Residential zone as well as corrections to the model to the first version of the model.

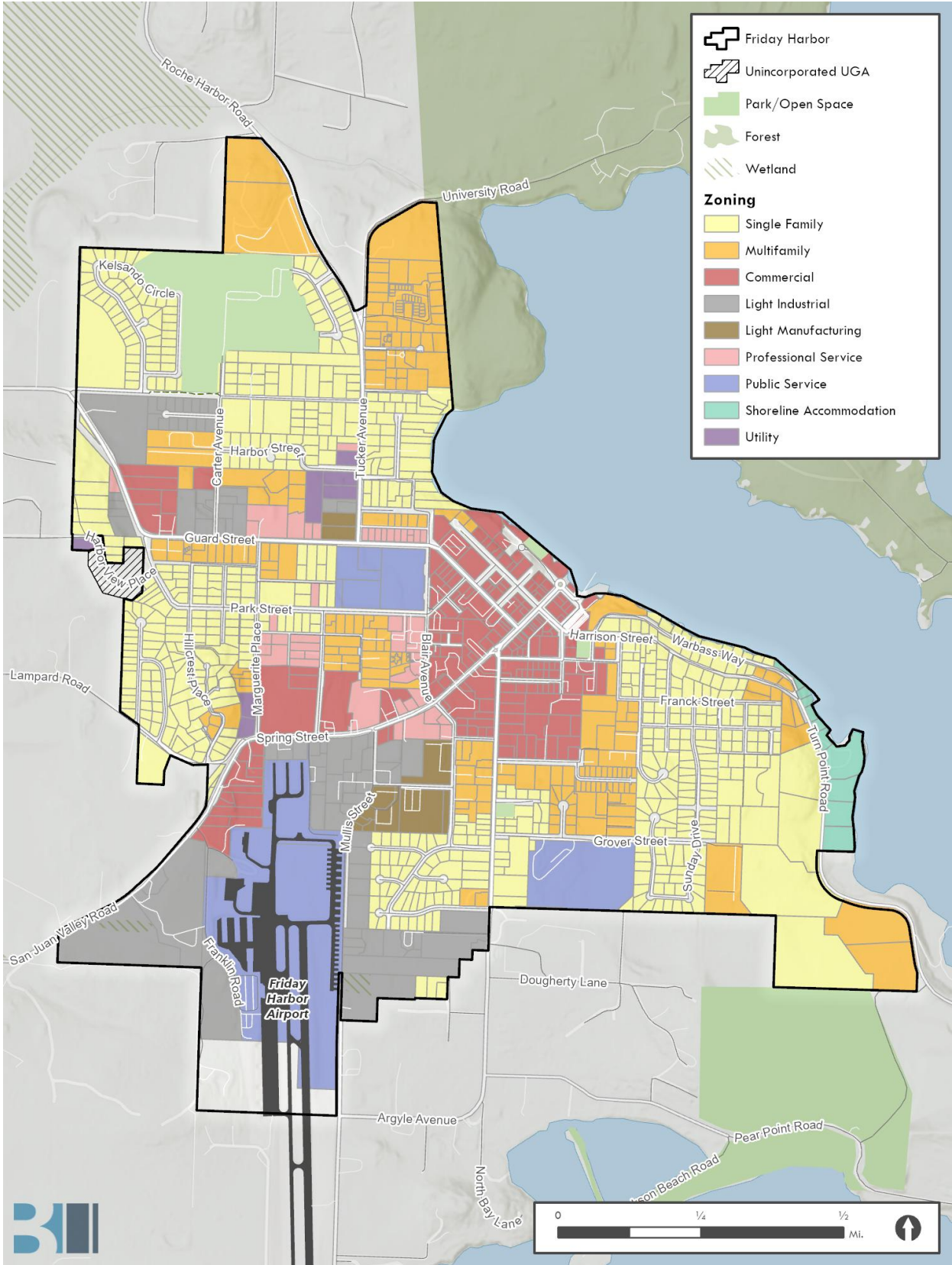
Current Conditions

The full list of current conditions is summarized in the following sections as well as in Exhibit 1, Exhibit 2, and Exhibit 3. Exhibit 1 is the currently adopted Zoning Map of Friday Harbor. Exhibit 2 shows the summary of current capacity including acreage by each zone in the town as well as the current capacity of proposed urban growth area expansions by current use type and proposed future zone. Exhibit 3 shows a total of only the housing estimates by subarea including the Town and each proposed urban growth area expansion (see section titled Proposed Urban Growth Area Expansion).

Current capacity calculations were based on a model created by BERK with several assumptions shown in Exhibit 4 including the deduction factor of each lot for public use including utilities and required setbacks, as well as deductions based on market factors (e.g. property owner is uninterested) that may reduce overall development potential of sites. Parcels were categorized into the following development statuses:

- Excluded
 - Parcels that were determined unlikely to be developed during the planning period due to plans for future non-housing or employment related improvements, critical areas, or based on knowledge from Town staff on historic properties.
- Underutilized
 - Parcels that are in zones (exclusive of Single-Family Residential zone) developed at a level where the improved land value is lower than the market land value. For residential zones these are parcels developed at a lower density than the minimum of their underlying zone.
- Partially Utilized
 - Single-Family Residential zone parcels that exceed minimum lot size by 100% (2x) making them possible candidates for potential subdivision during the planning period.
- Vacant
 - Parcels that are currently “undeveloped” per San Juan County Assessor data.
- Developed
 -
- All remaining parcels that do not meet the above criteria i.e. a parcel with a structure that meets or exceeds the minimum development capacity of the underlying zone.

Exhibit 1. Town of Friday Harbor Zoning Map



Source: Town of Friday Harbor, 2020; BERK, 2025

Exhibit 2. Summary of Current Capacity (2025)

Subarea/Zoning	Zone Code	Net Parcel Acres	Vacant Net Acres	Underutilized Net Acres	Partially Utilized Net Acres	Developed and Excluded Net Acres	Total Buildable Acres (after Deductions)	Housing Capacity - Vacant	Existing Housing Units - Underutilized	Net Housing Capacity - Underutilized	Housing Capacity - Partially Utilized	Total Net Housing Capacity
Town Limits	CO	79.09	9.62	10.36	-	59.11	13.92	-	1	-	-	-
	IN	84.67	9.68	12.68	-	62.31	15.52	-	2	-	-	-
	LM	12.57	0.84	0.91	-	10.82	1.22	-	2	-	-	-
	MF	127.08	9.42	6.10	-	111.56	10.90	68	19	38	-	106
	PS	20.60	0.71	0.89	-	19.00	1.11	-	1	-	-	-
	PU	84.65	8.66	-	-	75.99	6.24	-	-	-	-	-
	SA	9.63	2.12	3.76	-	3.75	4.07	-	1	-	-	-
	SF	270.14	46.55	-	22.88	200.70	47.92	134	-	-	57	191
Proposed UGA 1	UT	6.15	-	-	-	6.15	-	-	-	-	-	-
Proposed UGA 1	IN	8.27	1.71	-	-	6.56	1.23	-	-	-	-	-
	SF	5.54	2.41	-	3.13	-	3.79	6	-	-	8	14
Proposed UGA 2	MF	7.52	5.31	-	-	2.20	3.83	53	-	-	-	53
	SF	16.84	9.07	-	7.77	-	11.71	26	-	-	20	46
Proposed UGA 3	IN	5.22	-	5.22	-	-	3.53	-	1	-	-	-
	MF	2.43	-	-	-	2.43	-	-	-	-	-	-
	SF	10.03	-	-	10.03	-	7.01	-	-	-	28	28
Proposed UGA 4	IN	41.01	41.01	-	-	-	29.53	-	-	-	-	-
	PU	93.06	-	-	-	93.06	-	-	-	-	-	-
Proposed UGA 5	CO	16.56	5.25	-	-	11.31	3.78	-	-	-	-	-
	PU	25.49	-	-	-	25.49	-	-	-	-	-	-
	SF	278.01	62.68	-	190.47	24.87	172.35	180	-	-	508	688
Proposed UGA 6	MF	20.99	14.00	-	-	7.00	10.08	141	-	-	-	141

Source: San Juan County Assessor, 2025; BERK, 2025

Exhibit 3. Summary of Current Capacity by Subarea (2025)

Subarea Totals	Total Buildable Acres (after Deductions)	Housing Capacity - Vacant	Gross Housing Capacity - Underutilized	Existing Housing Units - Underutilized	Net Housing Capacity - Underutilized	Housing Capacity - Partially Utilized	Total Net Housing Capacity
Town of Friday Harbor	100.90	202	57	26	38	57	297
Unincorporated UGA	0.14	0	0	0	0	0	0
Proposed UGA 1	5.02	6	0	0	0	8	14
Proposed UGA 2	15.54	79	0	0	0	20	99
Proposed UGA 3	10.54	0	0	1	0	28	28
Proposed UGA 4	29.53	0	0	0	0	0	0
Proposed UGA 5	176.13	180	0	0	0	508	688
Proposed UGA 6	10.08	141	0	0	0	0	141
Total	347.87	608	57	27	38	621	1,267

Source: BERK, 2025

Exhibit 4. Table of Assumptions for Land Capacity Analysis

Zone Code	Minimum Lot Size (ac)	Residential Density	Public Use Deduction Factor - Vacant	Public Use Deduction Factor - Redevelopable	Market Factor - Vacant	Market Factor - Redevelopable
CO			0.2	0.1	0.1	0.25
IN			0.2	0.1	0.1	0.25
LM			0.2	0.1	0.1	0.25
MF		14	0.2	0.1	0.1	0.25
PS			0.2	0.1	0.1	0.25
PU			0.2	0.1	0.1	0.25
SA			0.2	0.1	0.1	0.25
SF	0.2066	4	0.2	0.1	0.1	0.25
UT			0.2	0.1	0.1	0.25

Source: BERK, 2025

Summary of Current Housing Conditions by Zone

Single-Family Residential Zone

Single-family residential parcels make up 270.1 gross acres or 39% of the town's 696.6 gross acreage. Developed and partially utilized area of the Single-Family Residential zone makes up 223.6 acres and contains an estimated 559 housing units of the town's 1,184. The minimum lot size of this zone is 9,000 square feet and the maximum allowed units per acre is 4.0 (otherwise referred to as R-4). Based on an analysis of the San Juan County Assessor's database, the town currently has an achieved density of 4.3 units per acre in the Single-Family Residential zone.

Multi-Family Residential Zone

Multi-Family residential parcels make up 127.1 gross acres or 18% of the town's 696.6 gross acreage. Developed and underutilized net acreage make up 117.7 acres and account for 544 housing units of the town's 1,184 estimated housing units. There is currently no minimum lot size in the Multi-Family Residential zone and the maximum allowed units per acre is 14 (otherwise referred to as R-14). Based on an analysis of the San Juan County Assessor's Database, the town currently has an achieved density of 11.5 units per acre in the Multi-Family Residential zone.

Currently, bonuses and incentive zoning to create affordable housing are managed on a case-by-case basis by Town staff and there is no codified strategy in the Town of Friday Harbor Municipal Code dedicated to achieving development of affordable housing within Friday Harbor.

San Juan County Allocation Update

The Washington State Office of Financial Management (OFM) provided population allocations at a county level. San Juan County and the Town of Friday Harbor have been in discussions about the allocations.

The Washington State Department of Commerce, in accordance with amendments to the Growth Management Act (HB 1220), has provided a tool to help counties, cities, and towns develop housing unit allocations by income band. San Juan County (the County) has in turn allocated a specific number of housing units at various income levels to the Town of Friday Harbor which it is required to plan for as part of the update to its Comprehensive Plan. The allocations for areas throughout San Juan County including Friday Harbor can be found in Exhibit 5.

Exhibit 5. San Juan County Growth Management Act Housing Unit Allocations by Income Band

Location	% of Total	Total	0-30%							STEP**
			Non-PSH*	PSH	>30-50%	>50-80%	>80-100%	>100-120%	>120%	
Friday Harbor + UGA	28.8%	916	311	26	279	63	38	38	161	10
Eastsound	16.2%	515	175	15	157	35	21	21	91	6
Lopez Village	7.7%	244	83	7	74	17	10	10	43	3
Rural Areas / LAMIRDs / AC	47.3%	1504	0	0	0	316	189	190	809	17

*PSH refers to Permanent Supportive Housing.

**STEP refers to four specific types of short-term emergency style housing and includes emergency shelters, transitional housing, emergency housing, and permanent supportive housing

Source: San Juan County, 2025

The Town is required to plan for 916 total housing units over the next 20 years, 10 of which are STEP [short-term emergency style housing] housing, 337 of which are for households earning 0-30% area median income (AMI), 279 for 30-50% AMI, 63 for 50-80% AMI, 38 for 80-100% AMI, 38 for 100-120% AMI, and 161 for 120+ AMI.

Currently most of the housing offered in the town does not serve extremely low-, low-, or moderate- income households earning less than area median income and does not meet the criteria laid out by OFM to meet GMA requirements. Town staff have identified Friday Harbor as a high-cost community. Commerce has identified which housing densities and housing types have historically served households at each income level. This full list can be found in Exhibit 6.

Exhibit 6. Example of relating zone categories to housing types and income levels served in higher-cost communities

Zone category	Typical housing types allowed	Lowest potential income level served		Assumed affordability level for capacity analysis
		Market rate	With subsidies and/or incentives	
Low Density	Detached single family homes	Higher income (>120% AMI)	Not feasible at scale*	Higher income (>120% AMI)
Moderate Density	Townhomes, duplex, triplex, quadplex	Higher income (>120% AMI)	Not typically feasible at scale*	Higher income (>120% AMI)
Low-Rise Multifamily	Walk-up apartments, condominiums (2-3-floors)	Moderate income (>80-120% AMI)	Extremely low, Very low, and Low-income (0-80% AMI)	Low income (0-80% AMI) and PSH
Mid-Rise Multifamily	Apartments, condominiums	Moderate income (>80-120% AMI)	Extremely low, Very low, and Low-income (0-80% AMI)	Low income (0-80% AMI) and PSH
High-Rise/Tower	Apartments, condominiums	Higher income (>120% AMI)	Moderate income (>80-120% AMI)	Moderate income (>80-120% AMI)
ADUs (all zones)	ADUs on developed residential lots	Moderate income (>80-120% AMI)	N/A	Moderate income (>80-120% AMI)

Source: Washington State Department of Commerce, 2023

As mentioned in the previous section, the town has several vacant, underutilized, and partially utilized parcels of land that may be developed into housing at a variety of densities and which may serve the needs of current and future residents at all income levels. A full list of the land capacity under current conditions including aforementioned deductions can be found in Exhibit 7. The exhibit also includes information on current unit capacity surplus and shortfall relative to the County allocations.

Exhibit 7. Current Land Capacity and Housing Capacity by Zone

Zone	Gross Parcel acres	Developable Land (acres)		Net Developable Land	Assumed Density	Net Housing Capacity		Total Net Housing Capacity	Allocation (Units)	Unit Capacity Surplus or Shortfall
SFR (R-4) >120% High-Income*	270.14	Vacant	46.55	69.43	4.3	Vacant	134	191	161	30
		Under Utilized	0			Under Utilized	0			
		Partially Utilized	22.88			Partially Utilized	57			
		Developed and Excluded	200.7							
Low-Rise Residential (R-14+ ADUs) >80-120% AMI	127.08	Vacant	23.41	29.51	11.5	Vacant	68	106	76	30
		Under Utilized	6.10			Under Utilized	38			
		Partially Utilized	0			Partially Utilized	0			
		Developed and Excluded	111.56							
Mid-Rise Residential (R-20 to R-30) 30-80% AMI + 0-30%/ PSH/STEP if subsidized*		Residential zone at this density does not currently exist				0	679	-679		

Source: San Juan County Assessor, 2025; Washington State Department of Commerce, 2023; BERK, 2025

*Based on Washington State Department of Commerce Housing Element Guidance Book 2 assumed affordability level

<https://deptofcommerce.app.box.com/s/1d9d5l7g509r389f0mjpowh8isjpirlh>

Next Steps

Identifying the current land capacity within the town plays a major role in meeting the allocations set forth by the State and the County. However, the Town's zoning, development standards, and town boundaries are incompatible with its ability to meet these allocations. The purpose of these next steps is to ensure that expected growth happens sustainably without sacrificing cultural resources or environmental sustainability and with community input from several dedicated community members and organizations in mind. These next steps will help to support increased housing options for residents at every income level and a continuity of the town's charm that has made it a wonderful place for visitors and residents alike.

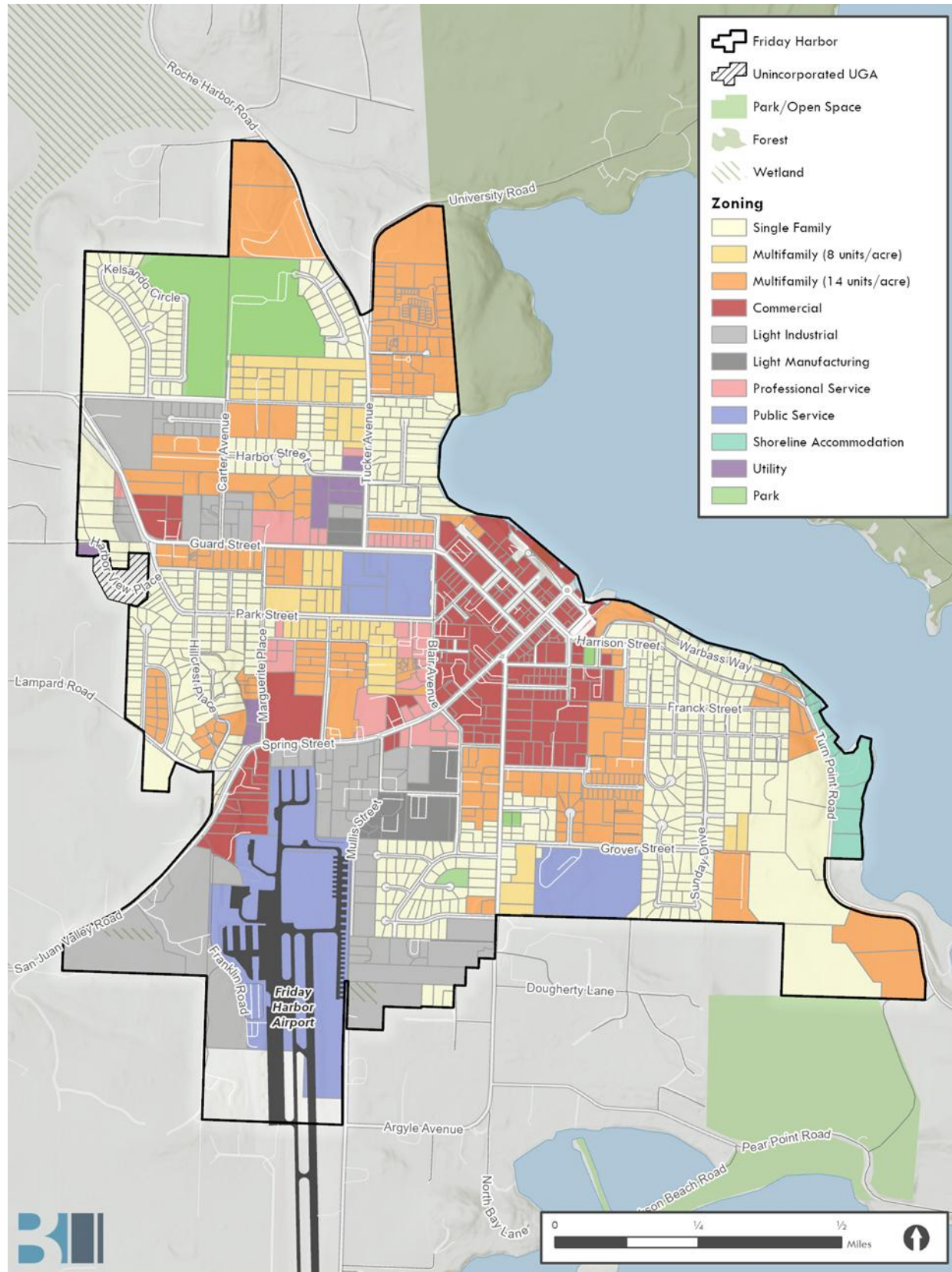
Draft Future Land Use

The Future Land Use Map for Friday Harbor (Exhibit 8) was drafted under the assumed adoption of several provisions. The most important of these provisions is the creation of both the R-8 Low-Density Multi-Family Residential zone and the creation of the Park zone.

Additional UGA expansions are not listed in but are listed in Exhibit 27 and further detailed in the section titled "Proposed Urban Growth Area Expansion."

While there are very few proposed changes to the town's overall land uses, there are several proposed changes to the allowed land uses and building types within each zone. Please note that this draft of the future land use map. The final map will be adopted by reference into the comprehensive plan but all capacity calculations for adequate provisions, housing incentives and tools, and proposed urban growth area expansions are based on draft future land uses.

Exhibit 8. Draft Future Land Use Map – Friday Harbor



Source: BERK, 2025

Exhibit 9. Town Limits

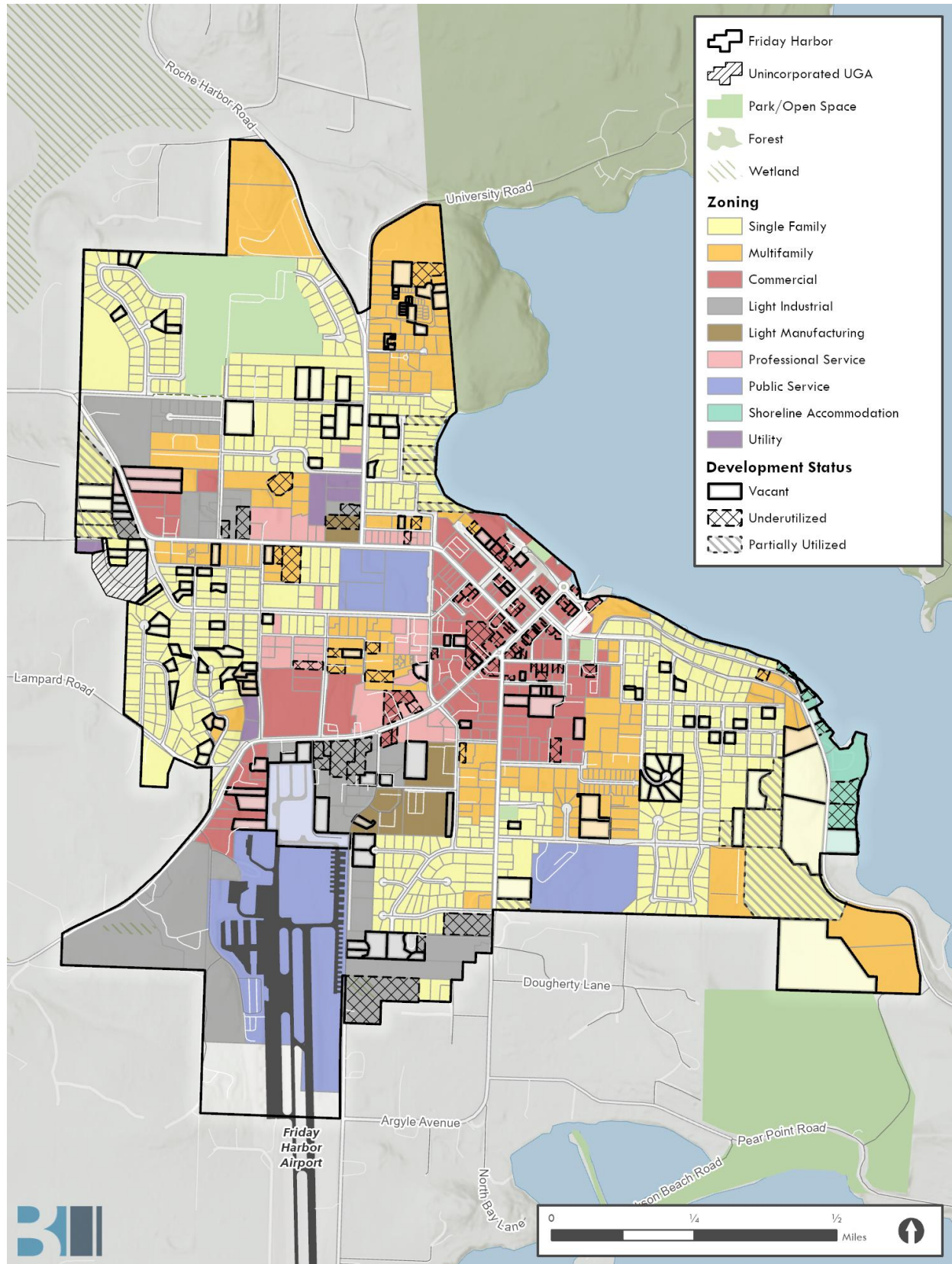
Zone Code	Net Parcel Acres	Vacant Net Acres	Underutilized Net Acres	Partially Utilized Net Acres	Developed and Excluded Net Acres	Total Buildable Acres (after Deductions)	Housing Capacity - Vacant	Existing Housing Units - Underutilized	Net Housing Capacity - Underutilized	Housing Capacity - Partially Utilized	Total Net Housing Capacity
CO											
PS											
MF-8											
ALT 1											
MF-14											
ALT 2											
MF-20											
ALT 3											
MF-24											
ALT 4											
MF-26											
ALT 5											
MF-30											
PS											
SF											

Adequate Provisions

Additional provisions to the zoning code, design standards, and bonuses may contribute to increases in housing capacity on currently vacant, partially utilized, and underutilized land.

Some land in the town is considered “developed” or “excluded” under current zoning but may be considered either underutilized or partially utilized if these zoning conditions were to change slightly. Additionally, the amount of capacity on “vacant”, “partially utilized”, and “underutilized” parcels may increase under these same conditions.

Exhibit 10. Map of Town of Friday Harbor – Development Status



Source: BERK, 2025

Capacity-Increasing Provisions

Some provisions to increase the capacity for housing growth during the 20-year planning period include the following:

- A decrease in the minimum lot size of Single-Family Residential parcels from 9,000 square feet to 4,500 square feet.
- Creation of an R-8 Multifamily residential zones
 - Rezone several parcels from R-4 to R-8
- An increase in residential density from R-14 to R-20 in Multi-Family Residential zone.
 - Rezone several parcels from R-4 to R-14/R-20 Multi-Family Residential.
- Density Bonuses for projects that include permanently affordable housing in residential zones:
 - 40% bonus for projects that include at least 20% of the (pre-density bonus) units permanently affordable to those with low- and extremely low-incomes
 - Units created under the affordable housing provisions must remain affordable for 50 years (RCW)
 - All unit counts are rounded to the nearest whole number of units.
- Allowance for mixed-use higher density residential (R-40) on both commercial and public services zoned parcels.
 - Predetermined residential to commercial square footage ratio
 - Commercial street frontage in Commercial zone
- Allowance for two ADUs on all Single-Family Residential parcels in accordance with HB 1337 and the associated amendment to the Growth Management Act see Accessory Dwelling Units (Residential) section below.

Support Provisions

Several additional changes are recommended for adoption into the town zoning code to support these Capacity-Increasing Provisions and help the Town meet its allocation targets,. These changes include the following:

- Renaming, reclassifying, or creating new residential zones to reflect that additional housing types are allowed:
 - Single-Family Residential zone (R-4) will be renamed to “Low-Density Residential”
 - New residential zone (R-8) will be named “Low-Density Multi-Family Residential”
 - Multi-Family Residential zone (R-14) will be renamed to “Moderate-Density Multi-Family Residential”
- Increasing the maximum height on parcels outside of the [Downtown Core](#) and the [View Protection Overlay](#) from 27 ft to 35 ft. This makes multi-story development (e.g. 3 stories) more feasible.
- Revising front and side yard setback requirements for “Low-Density Residential” in the following ways recognizing a new range of housing types and allow for appropriate design:
 - Front yards: from 20 feet from the right-of-way to 15 feet from the right of way.

- Side yards: from total not less than 15 feet with no one side yard less than five feet to 0 feet minimum setback.
 - There should be no changes to rear yard setbacks (5ft).
- Revising setback requirements for “Multi-Family Moderate-Density Residential” in the following ways:
 - Front yards: from 20 feet from the right-of-way to 15 feet from the right of way.
 - Side yards: from total not less than 15 feet with no one side yard less than five feet to 0 feet minimum setback.
 - There should be no changes to rear yard setbacks (5ft).
- Establish setbacks within the Low-Density Multi-Family Residential zone equal to Moderate-Density Multi-Family Residential zone.
- Increasing the maximum lot coverage in all residential zones to 50% recognizing a new range of housing types and allow for appropriate design.

Accessory Dwelling Units (Residential)

The Town of Friday Harbor has passed ordinance 1802 and 1803 to allow accessory dwellings units (ADUs) in the Low-Density Residential (LDR) zone. ADU design standards are clarified in the ordinance and reflected in the Town of Friday Harbor Municipal Code.

Additionally, HB 1337 and the associated amendment to the GMA requires that the Town of Friday Harbor allow 2 ADUs per parcel where zoning permits single-family homes. This would mean that all parcels that permit single-family homes would be permitted to build 2 ADUs using a combination of attached and detached ADUs (AADU & DADU respectively).

The goal of the adopted Town Ordinance and HB 1337 is to address affordable housing and increase overall unit density on Single-Family Residential zone parcels. An assumption of 10% was applied to estimate the number of single-family parcels that will build ADUs. Estimates on the number of ADUs that will be constructed in the Single-Family Residential zone can be found in the Low-Density Residential Zone (formerly Single-Family Residential Zone) section of this document.

Possible Impacts

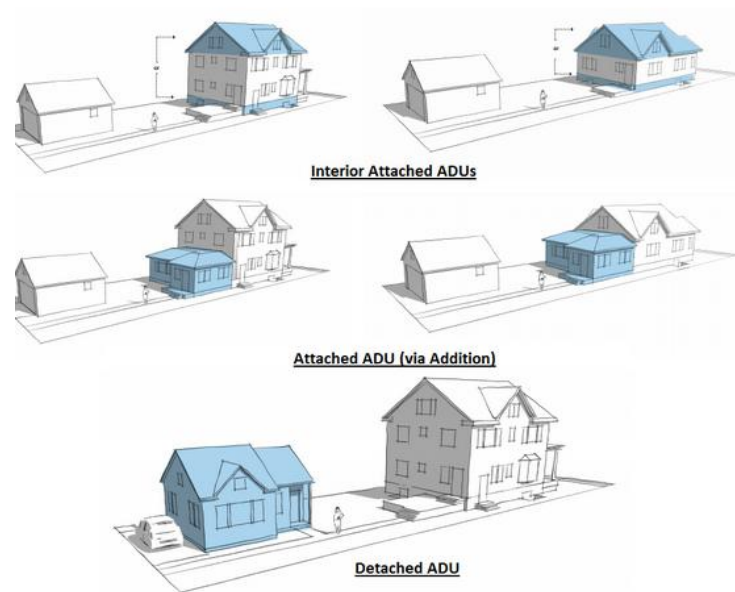
The impacts to each of the affected residential zones and the commercial zone are summarized in the following sections and exhibits. Each section highlights the possible impact if some or all of the “capacity-increasing provisions” are adopted and is analyzed separately by zone. The purpose is to determine which of these provisions are necessary to meet the allocation targets and which are not necessary but may be beneficial to lower housing costs and improve housing options.

Low-Density Residential Zone (formerly Single-Family Residential Zone)

As mentioned before, the provisions to increase the housing capacity of Low-Density Residential zone parcels in Friday Harbor include decreasing the minimum lot size from 9,000 sq. ft. to 4,500 sq. ft., and allowing 2 ADUs per parcel.

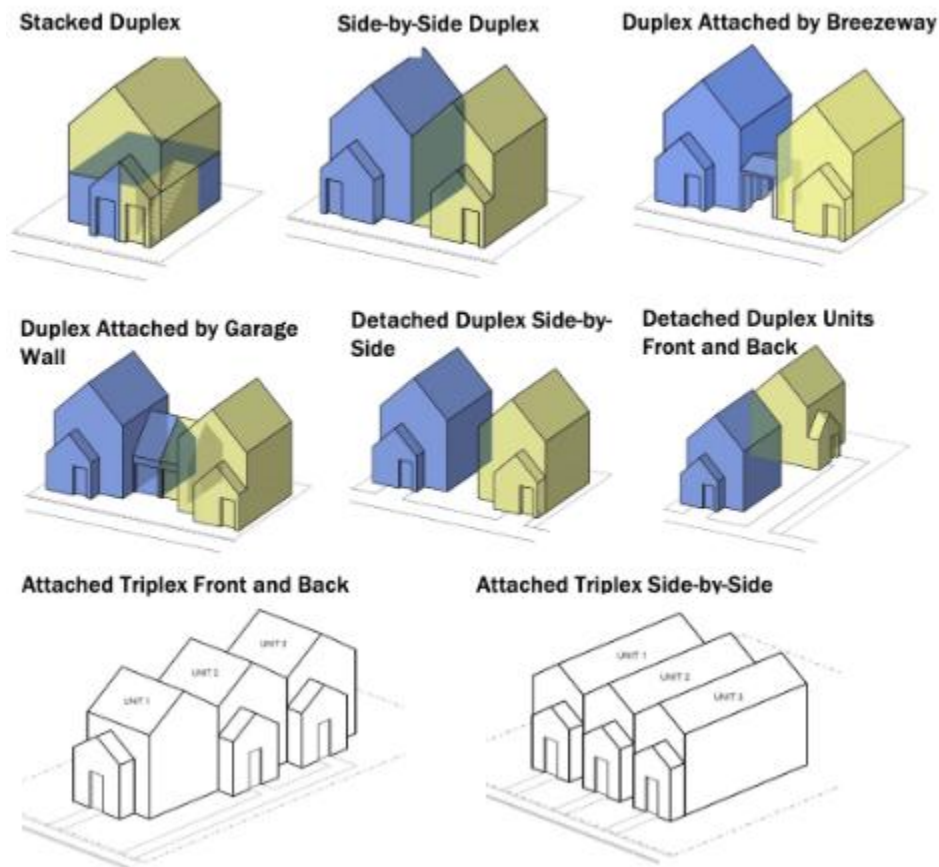
The recommendations to allow 2 ADUs per parcel by right together with the primary dwelling in this zone is meant to align the town with HB 1337 and allow for more density of units in the LDR zone. These changes to the development regulations of this zone would allow for some new middle housing types to be built on any parcels within the LDR zone similar to duplexes and triplexes (see Exhibit 11 and Exhibit 12).

Exhibit 11. Examples of ADUs with Primary Structure



Source: City of Saint Paul, MN; 2024

Exhibit 12. Possible ADU Configurations with no Primary Structure (Duplex and Triplex)



Source: Oregon Department of Land Conservation and Development, 2022; SERA Architects, 2022

The provision to reduce the minimum lot size is also primarily focused on increased housing capacity and aims to increase the number of lots that may be split into more than one lot. An additional provision that will support this is increasing maximum lot coverage which is based on the town's estimated median ground level lot coverage of 2,300 square feet. This would assume that a building footprint of 2250, or just slightly below the estimated median lot coverage would be able to be built on the newly divided lots and allow for similar scale of buildings in these zones while still increasing the overall capacity and building potential on these lots.

Estimated capacity for each of these changes and the overall capacity increase if each of these were adopted can be found in Exhibit 13. Additionally, as one of the provisions of this analysis is the creation of a new R-8 residential zone from parcels which are currently zoned LDR, 66.6 gross parcel and 6.18 acres were removed from the baseline added capacity analysis to parcel rezones to accommodate new R-8 parcels, new R-14 parcels, and parks parcels in Exhibit 13.

Exhibit 13. Estimated Capacity by Development Status and Capacity Provision

	Existing Capacity (with rezones)			Added Capacity			Total		
	Vacant	Partially Utilized	Dev	Vacant	Partially Utilized	Dev	Vacant	Partially Utilized	Dev
Min lot Size Decrease	108	56	559**	0	30	0	108	86	-
Two ADU Allowance*				11	6	56	119 (108 Primary + 11 ADU)	62 (56 Primary + 6 ADU)	56 (ADU only)
Combination				11	36	56	119 (108 Primary + 11 ADU)	95 (86 Primary + 9 ADU)	56 (ADU only)

* Commerce estimates of adoption of 10% estimate of adoption of building 1 ADU. This is a placeholder estimate and can be adjusted to reflect real demand of ADUs in Friday Harbor.

**559 is the number of existing homes in the Single-Family Residential zone, 56 ADUs is reflective of 559 existing housing units with 10% adoption

Source: BERK, 2025

While zones that permit single-family homes, duplexes, and triplexes would predominantly serve moderate- and high-income households, increasing the overall stock of houses at this density can accommodate new residents at these income levels and multi-generational households. Additionally, allowing for the development of new housing at these densities may reduce “down-renting” or the phenomenon of moderate- and high-income households residing in lower cost units that would otherwise be affordable to lower income households. Surpluses and shortfalls for each provision option at each income level for the LDR zone can be found in Exhibit 14.

Exhibit 14. Allocation Surplus and Shortfall by Income Level and Development Status in Low-Density Residential Zone

Option	80-120% (ADUs only)			>120%		
	Allocation	Capacity	Surplus/Shortfall	Allocation	Capacity	Surplus/Shortfall
Min lot Size Decrease Only	76	0	-76	161	194	+33
ADU Allowance* Only		73	-3		181	+20
Combination		76	0		214	+53

*Implies 10% adoption of ADUs in single-family parcels based on Commerce estimates. This is a placeholder estimate and can be adjusted to reflect real demand of ADUs in Friday Harbor.

Source: BERK, 2025

Incentives to build affordable housing such as density bonuses or waiving parking requirements for permanently affordable ADUs may also be considered in this zone. Potential impacts can be found in the section below titled

Additional Housing Incentives and Tools.

Low-Density Multi-family Residential Zone (New Zone)

The new Low-Density Multi-Family Residential zone (LDMF) is an opportunity to increase the prevalence of middle housing types of houses such as duplexes, triplexes, townhomes, and low-density apartment clusters. This proposed rezone would take existing Single-Family Residential and Professional Services parcels and convert them to a residential zone of 8 units per acre. The proposed LDMF zone would have similar guidelines as the existing Multi-Family Residential zone (herein referred to as Moderate-Density Multi-Family Residential or MDMF) such as the same set back requirements, no minimum lot size, and no allowances for the re-development of a site with only one single family home per parcel. One possible pitfall is that smaller parcels that are not able to consolidate with nearby parcels in this zone may only be able to accommodate a single dwelling unit at this density. For this reason, we recommend codifying and allowing variance within this zone to ensure parcels less than .5 acres build a minimum of 4 units per parcel in this area to achieve the intended goals and lower the barrier for middle housing development.

Estimated capacity for this new zone with Town limits and the Urban Growth area can be found below in Exhibit 15. Currently 40 single family housing units exist on 10.38 acres of developed land that would be designated LDMF. This estimate does not assume major redevelopment of these parcels as there is no way to estimate possible adoption rate of this new density, but it is reasonable to believe that some of these parcels will convert to higher density over time.

Exhibit 15. Estimated Capacity of Proposed LDMF Zone of Town and Existing UGA

	Existing Capacity at Designation (rounded)		Added Capacity		Total	
	Vacant	Partially Utilized	Vacant	Partially Utilized	Vacant	Partially Utilized
R-8	21	0	+17	+17	38	17

Moderate-Density Multi-Family Residential Zone (formerly Multi-Family Residential Zone)

The provision to increase the housing capacity of Moderate-Density Multi-family Residential zoned parcels in Friday Harbor include allowing zoning up to R-20, increasing lot coverage maximum from 30% to 50%. The necessity to increase the maximum density of this zone from 14 units per acre being further examined and will be addressed in the MDMF and Mixed-Use Provision Combined Analysis section of this document.

The recommendation to increase zoning to R-20, R-24, R-26, and R-30 is based primarily on the existing shortfall in housing unit capacity for households earning 0-80% AMI. Amending zoning standards such as increasing maximum lot coverage, increasing the maximum height of buildings in certain areas of the town, and decreasing set-back requirements are aimed at encouraging greater development of these parcels and maximizing land capacity. Estimated capacity for each of these changes and the overall capacity increase if each of these were adopted can be found in Exhibit 16.

Exhibit 16. Housing Capacity of Moderate-Density Multi-Family Residential Zone by Provision and Development Status (future land use)

	Existing Capacity		Added Capacity		Total		
	Vacant	Underutilized	Vacant	Underutilized	Vacant	Underutilized	Capacity
R-14 to R-20	118	36	46	23	164	59	223
R-14 to R-24			77	38	195	74	269
R-14 to R-26			93	46	211	82	293
R-14 to R-30			123	61	241	97	338

Source: BERK, 2025

The following section includes additional analysis of proposed mixed-use moderate- and higher-density development. The combined capacity analysis of the mixed-use provision and the MDMF zone including surpluses and shortfalls for each provision option at each income can be found in Exhibit 18 and Exhibit 19 which are in the section titled “MDMF and Mixed-Use Provision Combined Analysis”

Mixed-Use Provision

In addition to the moderate density housing types of the renamed MDMF zone, additional commercial and professional services parcels may provide much needed housing stock at all income levels to meet the state allocations. This new land use would require significant changes to existing development regulations but based on recommendations from town staff on acceptable mixed-use building types in the town, public engagement with business owners and residents, and estimates of possible adoption rates, we can roughly estimate the number of housing units that may be built in these zones.

Town staff have recommended a square footage ratio in these zones where a minimum of 30% of the square footage of a development would be commercial or public services while a maximum of 70% of the development is permitted to be residential. Mixed use developments would be required to maintain street frontage of professional services or commercial use to maintain a pedestrian and tourism friendly business districts.

The proposed maximum residential density of these parcels is based on similar developments throughout San Juan County and should be limited to 40 residential units per acre. This recommendation is also based on a previous recommendation from Town staff which would allow two ADUs on professional services or commercial properties that maintain business street frontage. Friday Harbor zoning code limits the maximum size of an ADU to 1,000 square feet while the smallest developed commercial properties are roughly .05 acres or 2178 square feet. This would mean that if the site were to be developed at the maximum density of R-40 it would allow for 2 additional units at roughly 1000 square feet which both meets and expands upon the previous commercial ADU recommendation.

While this recommendation assumes maximum density of 40 residential units per acre, estimated achieved density based on similar mixed-use developments is closer to 20 units per acre, which is what BERK has used in this analysis. Additional calculations on different commercial to residential square footage ratios were also conducted and will be included in this analysis as the overall adoption rate or achieved ratios were difficult to approximate.

Exhibit 17. Mixed-Use Residential Unit Estimates

CO Zone Only	Net Acres*	Share Residential	Density Assumption	Added Residential Rounded
Mixed Use - 70% residential allowed	12.0	0.7	20 Units/Ac	168
Mixed Use - 50% residential allowed	12.0	0.5		120
Mixed Use - 25% residential allowed	12.0	0.25		60

PS Zone Only	Net Acres*	Share Residential	Density Assumption	Added Residential Rounded
Mixed Use - 70% residential allowed	0.8	0.7	20 Units/Ac	11
Mixed Use - 50% residential allowed	0.8	0.5		8
Mixed Use - 25% residential allowed	0.8	0.25		4

Both Zones	Net Acres*	Share Residential	Density Assumption	Added Residential Rounded
Mixed Use - 70% residential allowed	12.8	0.7	20 Units/Ac	179
Mixed Use - 50% residential allowed	12.8	0.5		128
Mixed Use - 25% residential allowed	12.8	0.25		64

Source: BERK, 2025

*Net acres does not include developed acres or excluded acres

As noted in Exhibit 17, only vacant and underutilized commercial and professional services properties were calculated which means that the analysis failed to include developed parcels that may redevelop as mixed-use and also fails to estimate adoption levels of existing properties. A shortcoming of this analysis is the assumption that all vacant and underutilized properties develop as mixed-use with 20 residential units per net acre and existing developed properties do not re-develop at all in the planning period, neither of which is likely. However, it does provide an approximation of land capacity for these types of developments.

MDMF and Mixed-Use Provision Combined Analysis

Both the MDMF zone and mixed-use developments are calculated as potentially service 0-80% AMI households per Commerce Guidance, the following analysis shows how the different alternatives and assumptions may support the allocations from the County and OFM. Exhibit 18 below shows the possible surpluses and shortfalls of alternative 1 in which no change is made to the maximum density of the Moderate-Density Multi-Family Residential zone. Exhibit 19, 19, 20, and 21 show the same information with the assumed MDMF maximum density reaching 20, 24, 26, and 30 units per acre, respectively.

Exhibit 18. Allocation Surplus and Shortfall by Income Level and Development Status in R-14 MDMF Residential Zone and Proposed Mixed-Use Developments (Alternative 1)

Option	Allocation	Capacity	Surplus/Shortfall
(non PSH) 0-80%*			
MDMF R-14 No Mixed-Use Allowed	679	154	-525
MDMF R-14 Mixed-Use 70/30		333	-346
MDMF R-14 Mixed-Use 50/50		282	-397
MDMF R-14 Mixed-Use 25/75		218	-461

Exhibit 19. Allocation Surplus and Shortfall by Income Level and Development Status in R-20 MDMF Residential Zone and Proposed Mixed-Use Developments (Alternative 2)

Option	Allocation	Capacity	Surplus/Shortfall
(non PSH) 0-80%*			
MDMF R-20 No Mixed-Use Allowed	679	223	-456
MDMF R-20 Mixed-Use 70/30		391	-288
MDMF R-20 Mixed-Use 50/50		351	-328
MDMF R-20 Mixed-Use 25/75		287	-392

Source: BERK, 2025

*Based on commerce housing element guidebook in Exhibit 6

Exhibit 20. Allocation Surplus and Shortfall by Income Level and Development Status in R-24 MDMF Residential Zone and Proposed Mixed-Use Developments (Alternative 3)

Option	Allocation	Capacity	Surplus/Shortfall
(non PSH) 0-80%*			
MDMF R-24 No Mixed-Use Allowed	679	269	-456
MDMF R-24 Mixed-Use 70/30		448	-231
MDMF R-24 Mixed-Use 50/50		397	-282
MDMF R-24 Mixed-Use 25/75		333	-346

Source: BERK, 2025

*Based on commerce housing element guidebook in Exhibit 6

Exhibit 21. Allocation Surplus and Shortfall by Income Level and Development Status in R-24 MDMF Residential Zone and Proposed Mixed-Use Developments (Alternative 4)

Option	Allocation	Capacity	Surplus/Shortfall
(non PSH) 0-80%*			
MDMF R-24 No Mixed-Use Allowed	679	293	-456
MDMF R-24 Mixed-Use 70/30		472	-207
MDMF R-24 Mixed-Use 50/50		421	-258
MDMF R-24 Mixed-Use 25/75		357	-322

Source: BERK, 2025

*Based on commerce housing element guidebook in Exhibit 6

Exhibit 22. Allocation Surplus and Shortfall by Income Level and Development Status in R-24 MDMF Residential Zone and Proposed Mixed-Use Developments (Alternative 5)

Option	Allocation	Capacity	Surplus/Shortfall
(non PSH) 0-80%*			
MDMF R-30			
No Mixed-Use Allowed		338	-341
MDMF R-30			
Mixed-Use 70/30		517	-162
	679		
MDMF R-30			
Mixed-Use 50/50		466	-213
MDMF R-30			
Mixed-Use 25/75		402	-277

Source: BERK, 2025

*Based on commerce housing element guidebook in Exhibit 6

Based on this analysis and determination that Friday Harbor is a “higher-cost” community, the provisions for both the MDMF zone and the mixed-use developments allowances are inadequate to meet the allocations from the San Juan County and OFM. However, the possible shift in maximum density from 14 units per acre to 20, 24, 26, and 30 units per acre does show a significant increase in the overall capacity of the MDMF zone both with and without allowance for mixed-use development but does not meet the allocations at these income bands.

To meet these allocations the Town will likely need to explore additional upzones to several acres of existing Low- Density Residential parcels given the high number of “excluded” parcels, and the overall low acreage of vacant and underutilized MDMF parcels in Friday Harbor. The Town could also reach its allocation and more effectively serve these low- and extremely low-income households with increased maximum densities in the MDMF zone beyond the 5 studied.

Additionally, based on the data from commerce present in Exhibit 6, the town will need to increase subsidies and incentive for housing in conjunction with possible UGA expansions. Incentives that may help the Town to reach the allocated housing unit numbers for low-income households include density bonuses. An analysis of this specific provision can be found in the section below titled

Additional Housing Incentives and Tools.

Additional Housing Incentives and Tools

Two possible housing incentives that the Town can explore include density bonuses for affordable housing and parking requirement waivers. Density bonuses are a type of housing incentive in which maximum density for the underlying zone is increased in a proposed development to encourage developers to provide low-income units in their development. This incentive was chosen to increase the number of low-income housing units during the planning period. The structure of the proposed density bonus incentive is based on the City of Poulsbo's recently adopted density bonus ordinance as it is a comparable city in terms of coastal character, design standards, population, and housing affordability.

The proposed incentive would grant a density bonus of 40% to any project that includes at least 20% of the (pre-density bonus) units affordable for those households earning 0-80% AMI. The Town would require that the owner of the property record a covenant and to gain the Town's consent prior to selling or leasing the unit, so the Town can verify that affordability requirements are met. Similarly to the Town of Friday, other small jurisdictions have struggled to encourage low-income housing development in recent years meaning that there is a small sample size of developments and adoption rates are challenging to calculate.

Waived parking minimums in exchange for the provision of affordable housing in Commercial zones and all three proposed residential zones can also be included. Per Commerce guidance, it is unlikely that single-family homes can be subsidized or incentivized to accommodate 0-80% AMI at measurable scale which is why this incentive in LDR was estimated to show that ADU parking requirements could be waived to encourage production. The new adoption rate if this incentive is adopted is 20% (up from 15%) as lower costs may lead to more adoption. Parking requirement waivers in exchange for permanently affordable units can also lower the cost of production for all other types of housing and may be enough to incentivize developers to build these types of units. The adoption rate for incentives in the LDMF, MDMF, and mixed-use developments is not included in this analysis. A conservative estimate of the possible housing production under these incentive can be found in Exhibit 23.

Exhibit 23. Incentive Based Housing Capacity Estimate (rounded)

Housing Type Parking Incentive	Estimated Pre-incentive Capacity*			Estimated Subsidized Affordable Unit Production
	Vacant	Partially Utilized/ Developed	Total	
Accessory Dwelling Units	16	97	113	151

Density Bonus	Vacant	Under Utilized	Total	Affordable	Additional Capacity	New Total
Alternative 1 MDMF Density Bonus (R-14) Note: Allowed Max Density Increases to R-20	118	36	154	30	61	215
Alternative 2 MDMF Density Bonus (R-20) Note: Allowed Max Density Increases to R-28	164	59	223	45	89	312
Alternative 3 MDMF Density Bonus (R-24) Note: Allowed Max Density Increases to R-34	195	74	269	54	108	377
Alternative 4 MDMF Density Bonus (R-26) Note: Allowed Max Density Increases to R-36	211	82	293	59	117	410
Alternative 5 MDMF Density Bonus (R-30) Note: Allowed Max Density Increases to R-42	241	97	338	68	135	473

Source: BERK, 2025

Proposed Urban Growth Area Expansion

Under GMA, the County has the responsibility to allocate growth and to size UGAs.

Proposed new UGAs for Friday Harbor include parcels that are currently designated as Unincorporated San Juan County. Additions to the Friday Harbor UGA (FHUGA) must meet several criteria laid in [RCW 36.70A.110](#) which include but are not limited to parcels that are “already characterized by urban growth that have adequate existing public facility and service capacities to serve such development” and “include areas and densities sufficient to permit the urban growth that is projected to occur in the county or city for the succeeding twenty-year period.” Land that is not already characterized by urban growth, and lies adjacent to urban areas and can be served with urban public services can be considered for inclusion in an urban growth area (UGA) if there is a need to meet 20-year growth allocations (considering any approach to increasing capacity inside the city/town consistent with GMA and case law to promote urban growth and avoid sprawl).

Additional urban growth GMA guidance from the State of Washington can be found the [Washington Administrative Code Chapter 365-196-310](#) and additional guidance from San Juan County Joint Planning Policies (2020) helped to shape the criteria used to evaluate the six proposed UGA expansion areas.

Exhibit 24. Criteria for Potential Urban Growth Area Expansions

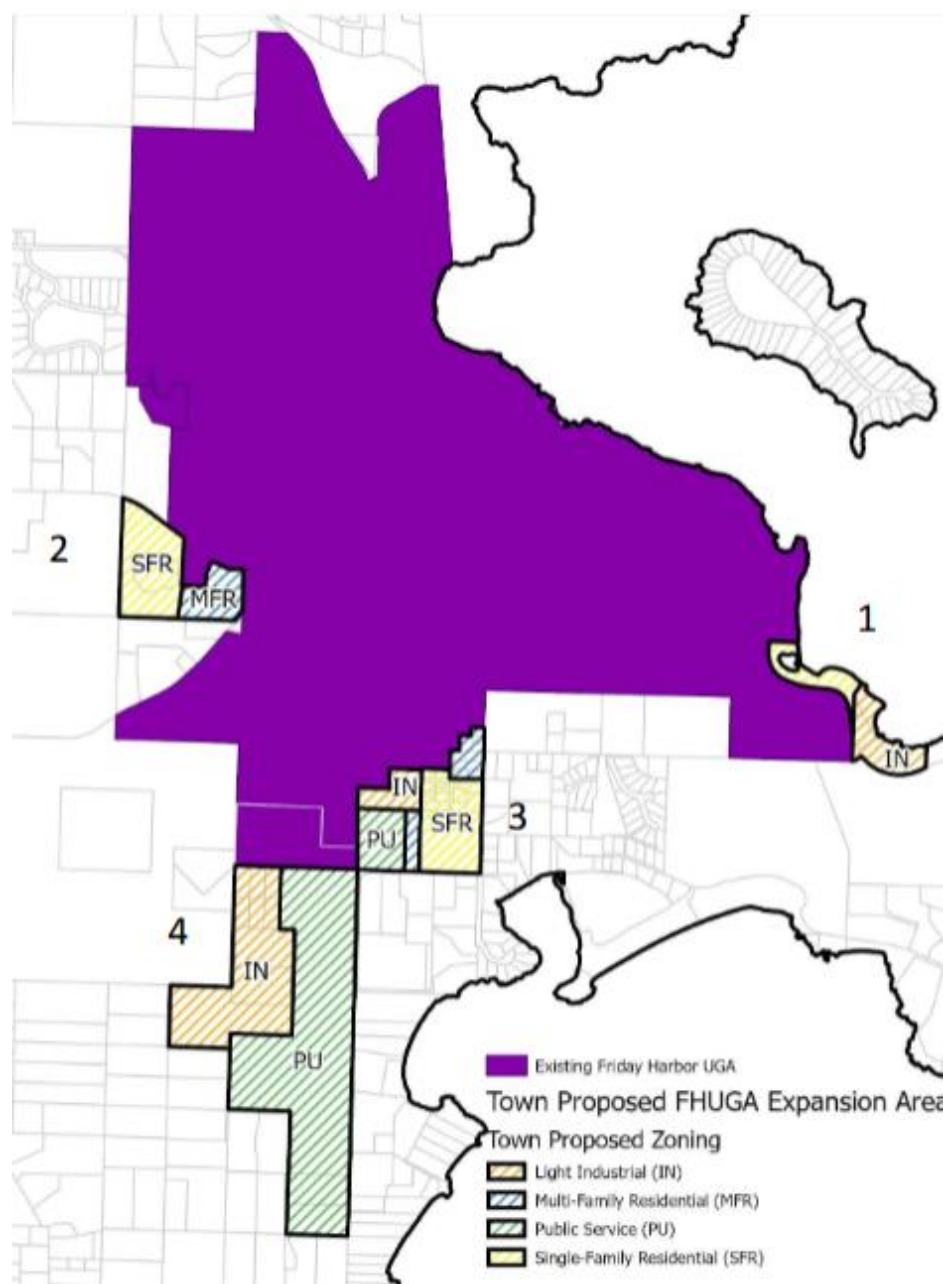
The area is already characterized by urban development.
The area is proximal to the Town of Friday Harbor corporate limits of areas characterized by urban development.
The area has the ability to support urban levels of development.
The area does not contain extensive designated critical areas and it does not contain designated resource lands of long-term commercial significance. It does not contain other lands with limited development capability as defined in a land use inventory.
The area contains natural or topographic features which may serve to define the boundaries of the Friday Harbor UGA.
In situations where the Town’s land capacity is insufficient in meeting growth allocations in housing and employment, The area either increases housing and/or employment capacity or increases the Town’s public service provision capabilities.
The area contains developed parcels under common ownership or use that are not under common jurisdiction and the proposed UGA would correct this administrative error. i.e. The Friday Harbor Airport property is partially within the Town of Friday Harbor and partially outside of the Town of Friday Harbor.

Source: Washington Administrative Code - 365-196-310; San Juan County, Town of Friday Harbor Joint Planning Policies, 2020; RCW 36.70A.110

To add new UGAs to the Town of Friday Harbor it is required that the areas either are already urban in use or potential use, can be served with urban services (e.g. sewer) within the service capacity of the Town, or can ensure that the Town meet growth allocations of growth over the next 20 years. As described earlier in this memo, having capacity to meet housing of all types and income levels would be challenging with existing land capacity and even with changes to the municipal code.

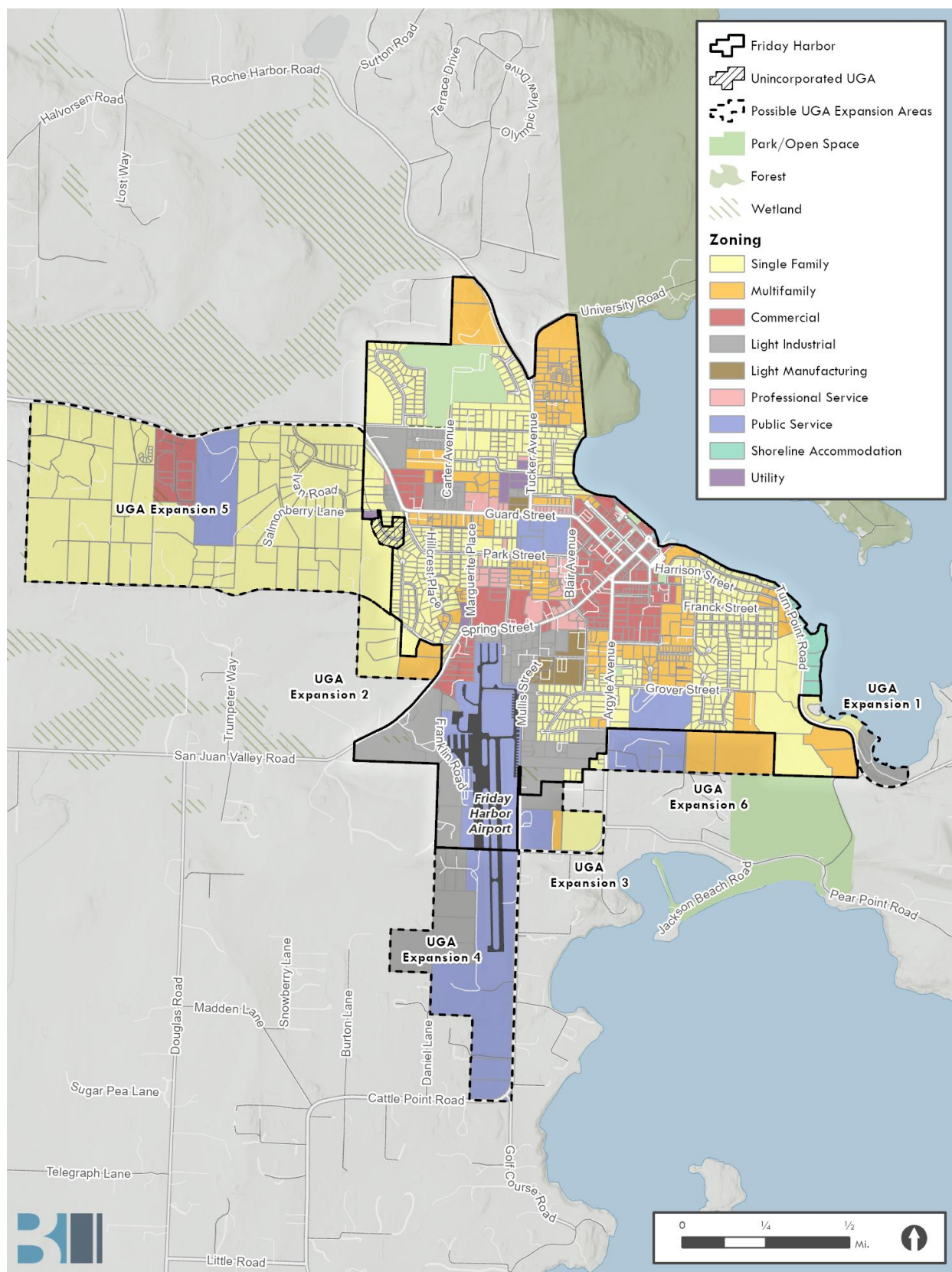
The San Juan County Department of Community Development presented several possible UGA expansions for the Town of Friday Harbor to the County Planning Commission in August 2020 and presented the map in Exhibit 25. These UGA expansions were studied as part of the upcoming Comprehensive Plan Update for criteria listed in RCW 36.70A.110. Additional parcels were added to and removed from the four proposed UGA expansions shown in Exhibit 25. Also, two additional UGA expansion areas are being proposed in light of the OFM growth allocations and the necessity to accommodate growth in the 20 years following the Comprehensive Plan Update. A map showing all 6 potential UGA expansion areas be found in Exhibit 26. The following sections highlight each of the proposed UGA expansions and provide information on their qualifications to be included in the FHUGA.

Exhibit 25. Map of Friday Harbor with Proposed Urban Growth Area Expansions (2020)



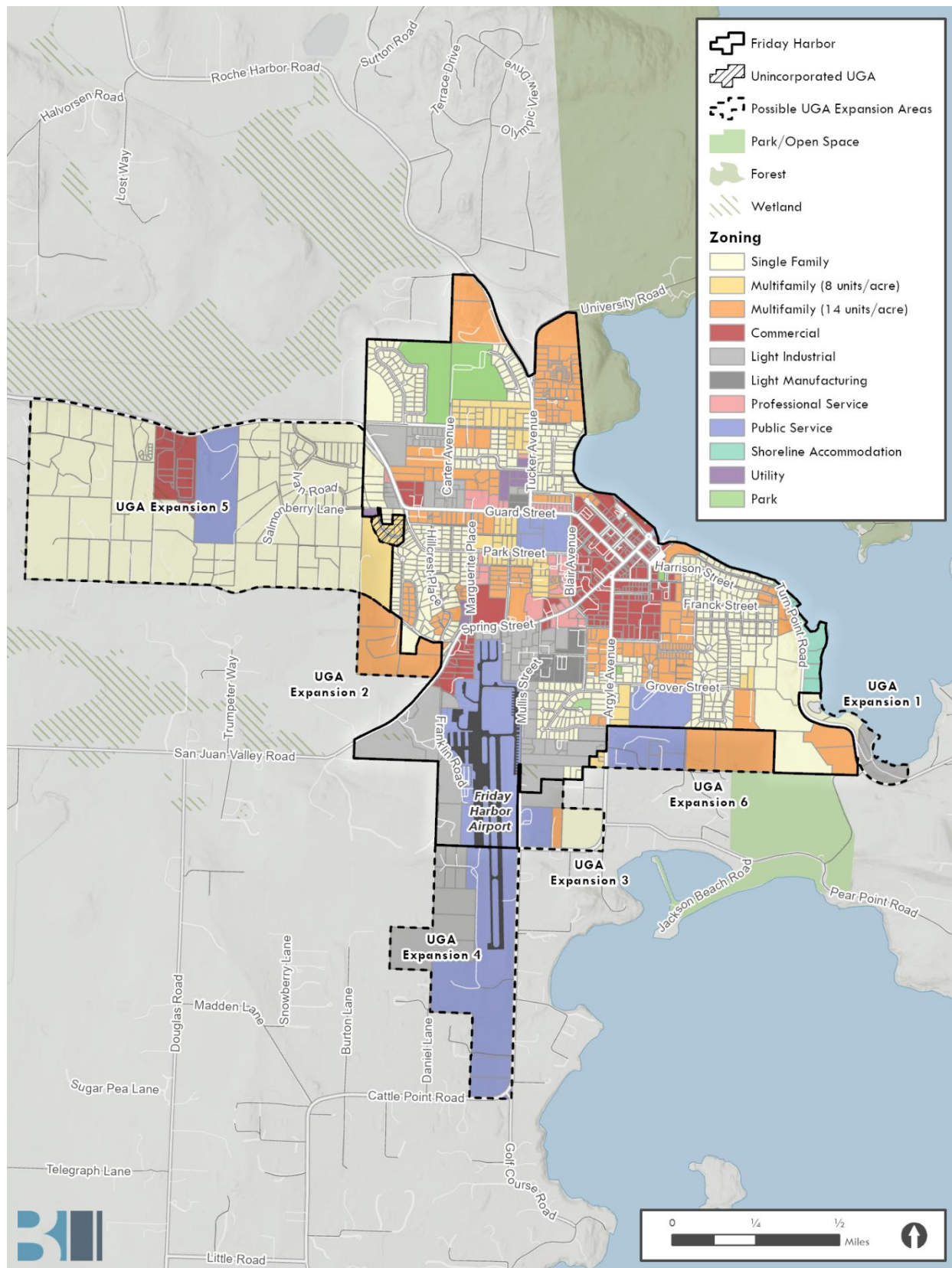
Source: San Juan County Community Development, August 2020

Exhibit 26. Map of Town of Friday Harbor with Proposed Urban Growth Area Expansions - Current Zoning and Land Use (2025)



Source: BERK, 2025

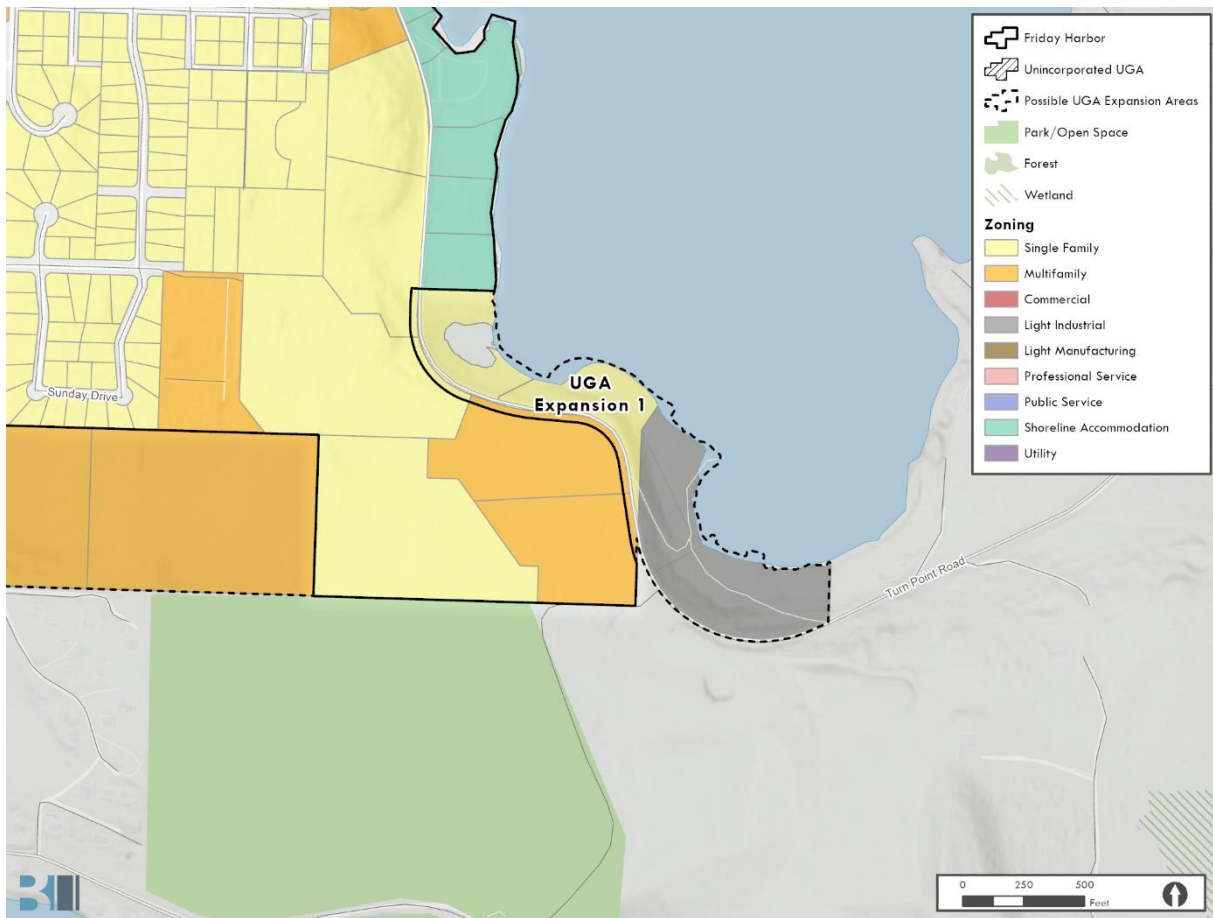
Exhibit 27. Draft Future Land Use Map of Friday Harbor with Proposed Urban Growth Area Expansions



Source: BERK, 2025

Proposed UGA 1

Exhibit 28. Map of Proposed UGA 1 – Current Land Use



Source: BERK, 2025

Background

Proposed UGA 1 is the smallest of the proposed UGA expansions. The purpose of this proposed UGA expansion is to increase the employment capacity of the FHUGA and to mitigate possible impacts to critical shoreline habitats. Additionally, this possible expansion of the FHUGA would bring three additional Port of Friday Harbor properties into the Town of Friday Harbor UGA which may help to alleviate future employment shortfalls that were identified in the land capacity analysis. The area is largely urban in character and is served with Town water. It has the fewest developable acres to accommodate housing. This proposed UGA expansion satisfies the following criteria:

Criteria	Discussion
The area is already characterized by urban development	This area already has single-family residential land as well as partially utilized light industrial land.
The area is proximal to the Town of Friday Harbor corporate limits of areas characterized by urban development	This area is directly adjacent to the Town of Friday Harbor's corporate limits and other similar land uses.
The area has the ability to support urban levels of development	This area includes partially developed parcels that can already be characterized as urban development. The area is largely urban in character and is served with Town water. It is not currently served by Town sewer or solid waste.
The area contains designated critical areas and resource lands, and other lands with limited development capability as defined in a land use inventory	Shoreline adjacent parcels in this proposed UGA expansion has limited development capabilities but has inland development capabilities.
The area contains natural or topographic features which may serve to define the boundaries of the Friday Harbor UGA.	This area directly abuts the shoreline and by adopting this proposed UGA expansion into the FHUGA there would be a definitive natural boundary to the east.

Source: San Juan County CWPP; 2020

Size

The proposed UGA is 11.58 acres in total. 6.56 of which are developed and 5.02 of which is deemed "buildable" and largely part of the partially developed industrial land.

Utilities

Sewer and Solid Waste utilities are not currently provided to this proposed UGA. Utility extension is possible if the area were added to the FHUGA. The 2020 wastewater management plan shows upgrades to the existing wastewater treatment plant are necessary regardless of this proposed UGA's inclusion. To serve Proposed UGA #1, a sewer main extension and connections from residential and commercial structures would be needed. Water resources are adequate to support this proposed UGA expansion per the 2013 Water System Plan. Solid waste facilities for the Town of Friday Harbor are currently adequate to support this proposed UGA expansion per the 2018 Solid Waste Management Plan; however additional collection days or packer trucks may be needed to accommodate growth in the town regardless of where the growth occurs based on an increased number of solid waste customers.

Land Use Patterns

The main features of this UGA expansion are the Port of Friday Harbor owned Shipyard Cove and Jensen's Marinas as well as the Albert Jensen & Sons boatyard. Additionally, two residential parcels would be included in this UGA expansion. One of which is a developed parcel based on Town Staff historical knowledge of the site and the other site is a vacant parcel that has redevelopment potential. The overall buildable acres of these proposed residential parcels is 3.79 acres and the overall buildable acres of the light industrial parcels (including Jensen's Marina) is 1.23 acres.

Summary

Proposed UGA 1 would provide services to Parcels in San Juan County that are already urban in nature, directly adjacent to existing corporate limits, and have some development potential for employment and housing. For these reasons, we recommend that the County consider adopting this area into the Friday Harbor UGA.

Exhibit 29. Summary of Capacity in Proposed UGA Expansion Area 1 - Draft Future Land Use

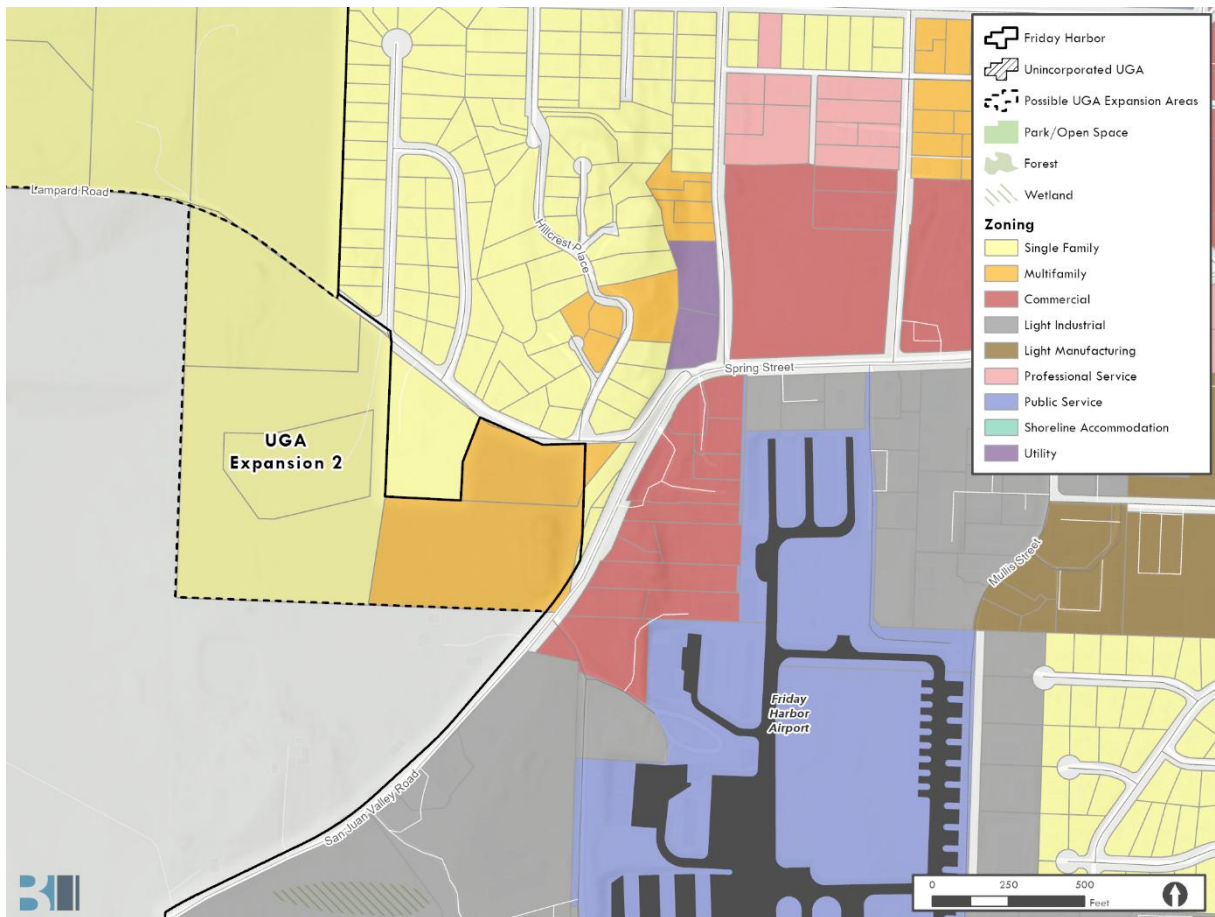
Zone Code	Net Parcel Acres	Vacant Net Acres	Underutilized Net Acres	Partially Utilized Net Acres	Developed and Excluded Net Acres	Total Buildable Acres (after Deductions)	Housing Capacity - Vacant	Existing Housing Units - Underutilized	Net Housing Capacity - Underutilized	Housing Capacity - Partially Utilized	Total Net Housing Capacity
SF	5.54	2.41	-	3.13	-	3.89	6	-	-	8	14

Proposed UGA Area	AMI served	Capacity -Pre-Incentives	Capacity - Post-Incentives
1	0-80%	-	-
	80-120%	1 - 2	3
	120+	14	14

Source: BERK, 2025

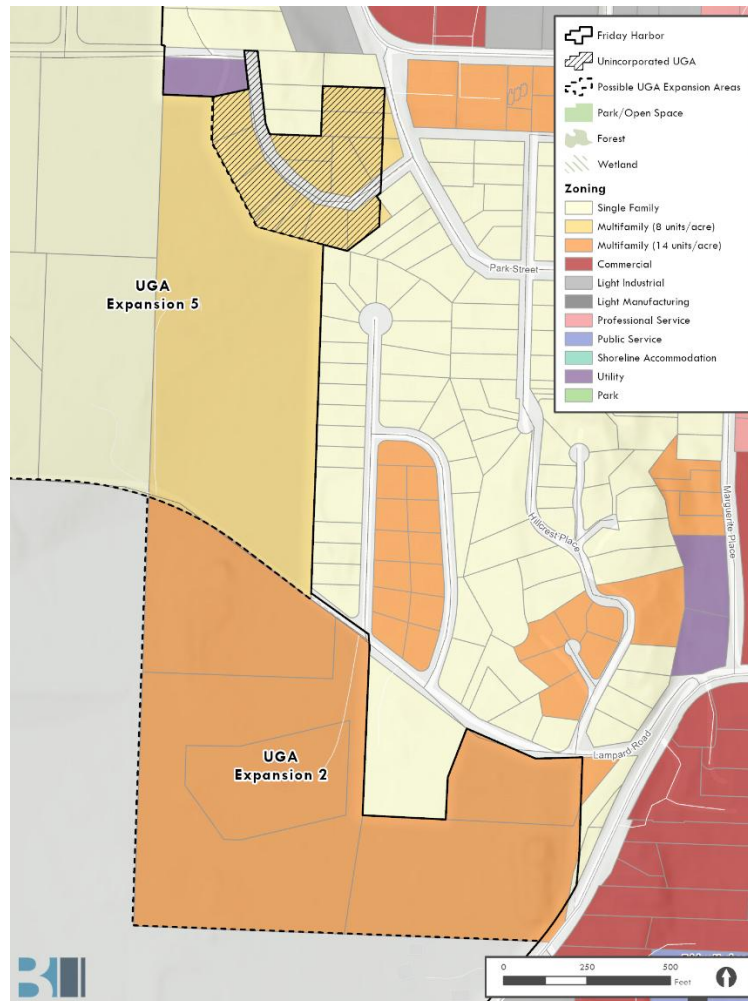
Proposed UGA 2

Exhibit 30. Map of Proposed UGA 2- Current Land Use



Source: BERK, 2025

Exhibit 31. Map of Proposed UGA 2– Draft Future Land Use



Background

Proposed UGA 2 is characterized by five large residential parcels on the West side of the town near the corner of San Juan Valley Road and Lampard Road. These parcels have high future development potential in the planning period given their size and status as either vacant or partially utilized. Currently the 3 parcels on the Western side of the proposed UGA expansion are under common ownership and adds the possible housing capacity in the town if the landowner chooses to develop. The southeastern parcel is currently vacant and would add 5.4 acres of multifamily capacity to the FHUGA. The northeastern parcel is excluded from the capacity calculation based on Town Staff recommendation to ensure a more accurate model. It is included in this UGA for continuity of the town border.

Criteria	Discussion
The area is already characterized by urban development	This area already has partially utilized single-family residential land. It is primarily undeveloped though it is utilized at a similar level to adjacent parcels within the Town's corporate limit.
The area is proximal to the Town of Friday Harbor corporate limits of areas characterized by urban development	This area is directly adjacent to the Town of Friday Harbor's corporate limits and other similar land uses.
The area has the ability to support urban levels of development	This area includes partially developed parcels which Town utilities should be able to support with small expansions to water, sewer, and solid waste systems.
In situations where the Town's land capacity is insufficient in meeting growth allocations in housing and employment, The area either increases housing and/or employment capacity or increases the Town's public service provision capabilities.	The Town's land capacity for developable multi-family residential parcels is currently insufficient. If the parcels within the proposed UGA were to be added to the FHUGA, there would be added capacity and additionally, the single-family residential parcels to the west of the property may be considered for future rezoning to LDMF (R-8) if the proposed UGA were adopted.

Source: San Juan County CWPP; 2020

Size

The proposed UGA is 17.74 acres in total. 2.20 of which are developed or excluded and 15.54 of which is deemed "buildable". There is currently capacity for 79 additional housing units under current design standards and zoning code with opportunities for additional units if additional provisions are adopted.

Utilities

Utilities are not currently provided to this proposed UGA but would be if it were adopted into the FHUGA. Utilities include solid waste, sewer, and water. The 2020 wastewater management plan shows that upgrades to the existing wastewater treatment plant are necessary regardless of this proposed UGAs adoption. A sewer main extension and connections would be needed. Water resources are adequate to support this proposed UGA expansion per the 2013 Water System Plan. Solid waste facilities for the Town of Friday Harbor are currently adequate to support this proposed UGA expansion per the 2018 Solid Waste Management Plan, however additional collection days or packer trucks may be needed to accommodate growth regardless in the town regardless of where the growth occurs based on an increased number of solid waste customers.

Land Use Patterns

One parcel on the west side of this area is developed with a single-family home and one parcel is developed on the northeastern most corner of the area. The remaining parcels are vacant with redevelopment potential either as a large, splittable residential parcel or as a multi-unit residential development. The overall buildable acres of these proposed residential parcels is 15.54 acres.

The proposed future land use of this site includes a full rezone of residential parcels to MDMF zoning to promote more housing development.

Summary

Proposed UGA 2 both in current land use and possible future land use would only partially help meet growth allocations for housing. This expansion would provide utility services to parcels in Unincorporated San Juan County which are already urban in nature, directly adjacent to existing corporate limits, and have some development potential. For these reasons, we recommend that the County consider adopting this area into the Friday Harbor UGA.

Exhibit 32. Summary of Capacity in Proposed UGA Expansion Area 2 - Draft Future Land Use

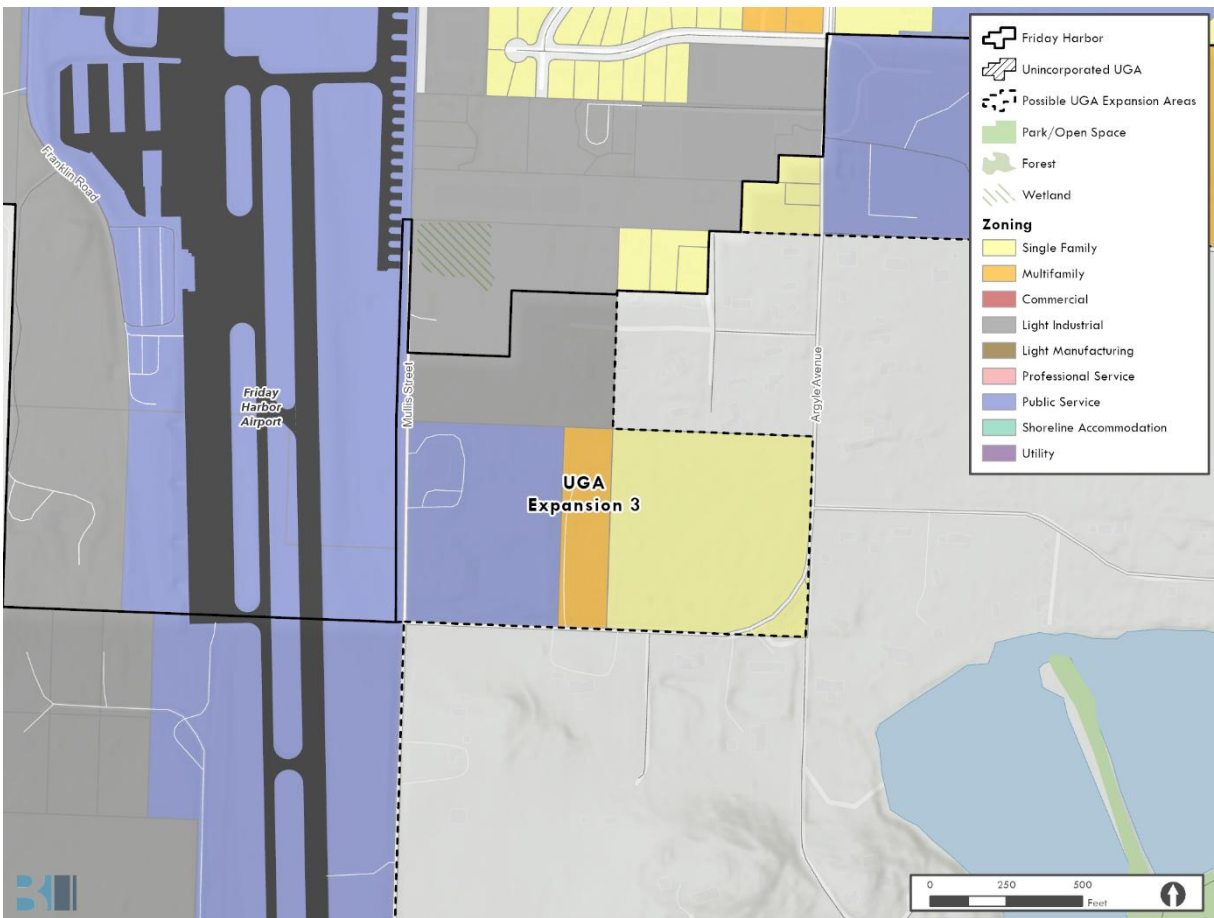
Zone Code	Net Parcel Acres	Vacant Net Acres	Underutilized Net Acres	Partially Utilized Net Acres	Developed and Excluded Net Acres	Total Buildable Acres (after Deductions)	Housing Capacity - Vacant	Existing Housing Units - Underutilized	Net Housing Capacity - Underutilized	Housing Capacity - Partially Utilized	Total Net Housing Capacity
ALT 1 MF-14	24.36	14.39	14.39	-	9.97	10.36	145	-	-	-	145
ALT 2 MF-20	24.36	14.39	14.39	-	9.97	10.36	207	-	-	-	207
ALT 3 MF-24	24.36	14.39	14.39	-	9.97	10.36	248	-	-	-	248
ALT 4 MF-26	24.36	14.39	14.39	-	9.97	10.36	269	-	-	-	269
ALT 5 MF-30	24.36	14.39	14.39	-	9.97	10.36	310	-	-	-	434

Proposed UGA Area		AMI served	Capacity -Pre-Incentives					Capacity - Post-Incentives				
2		0-80%	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5
			145	207	248	269	310	203	290	347	377	434
		80-120%	-					-				
		120+	-					-				

Source: BERK, 2025

Proposed UGA 3

Exhibit 33. Map of Proposed UGA 3 – Current Land Use



Source: BERK, 2025

Background

Proposed UGA 3 is characterized by four parcels directly south of current town corporate limits east of Mullis Street and the Friday Harbor Airport. Two of these parcels have future development potential in the planning period if they were to be zoned for residential after adoption.

Currently the parcel on the southwestern side of the proposed UGA is operated under public utility use as the station and administrative offices of the San Juan County Fire District 3 and owned by the Port of Friday Harbor. The parcel north of this is currently designated as light industrial. Both sites have development potential and may help the town meet future employment allocations from the County while the residential parcels of this proposed UGA have development potential and may help meet the housing allocations from the County. Additionally, this would serve to alleviate administrative mistakes with previous town boundaries excluding port owned properties under common use such as properties adjacent to the airport.

Criteria	Discussion
The area is already characterized by urban development	This area already has partially utilized single-family residential land that is utilized at a similar level to adjacent parcels within the Town's corporate limit.
The area is proximal to the Town of Friday Harbor corporate limits of areas characterized by urban development	This area is directly adjacent to the Town of Friday Harbor's corporate limits and other similar land uses.
The area has the ability to support urban levels of development	This area includes partially developed parcels that may already be characterized as urban development. While utilities are not currently provided to these sites, Town water, sewer, and solid waste service provision is possible.
In situations where the Town's land capacity is insufficient in meeting growth allocations in housing and employment, the area either increases housing and/or employment capacity or increases the Town's public service provision capabilities.	The Town's land capacity for developable multi-family residential parcels is currently insufficient. If the parcels within the proposed UGA were to be added to the FHUGA, there would be added capacity and additionally, the single-family residential parcels to the west of the property may be considered for future rezones if the proposed UGA were adopted. Additionally, the parcel currently housing the San Juan Island Fire and Rescue station may support additional airport facilities or employment capacity.
The area contains developed parcels under common ownership or use that are not under common jurisdiction and the proposed UGA would correct this administrative error. i.e. The Friday Harbor Airport property is partially within the Town of Friday Harbor and partially outside of the Town of Friday Harbor.	The southeasternmost parcel of this proposed UGA is currently owned by the Port of Friday Harbor. This UGA expansion would alleviate this past administrative error.

Source: San Juan County CWPP; 2020

Size

The proposed UGA is 12.96 acres in which 10.53 acres are deemed "buildable" at least in part. 2.43 of these acres have potential to be converted to Moderate-Density Multi-Family and converted from excluded/developed to buildable and 7.07 acres may be zoned LDR to be consistent with current land use. There is currently capacity for 28 additional housing units in the easternmost parcel of proposed UGA 3. This is assuming current zoning requirements; however there are opportunities for additional units if additional provisions are adopted.

Utilities

Utilities are not currently provided to this proposed UGA but would be if it were adopted into the FHUGA. Utilities include solid waste, sewer, and water. The 2020 wastewater management plan shows that upgrades to the existing wastewater treatment plant are necessary regardless of this proposed UGA's adoption. A sewer main extension and connections would be needed. Water resources are adequate to support this proposed UGA expansion per the 2013 Water System Plan. Solid waste facilities for the Town of Friday Harbor are currently adequate to support this proposed UGA expansion per the 2018 Solid Waste Management Plan, however additional collection days or packer trucks may be needed to accommodate growth in the town regardless of where the growth occurs based on an increased number of solid waste customers.

Land Use Patterns

The main feature of this UGA expansion is the large Port of Friday Harbor-owned property which contains a San Juan County Fire District 3 station. Additionally, two residential parcels would be included in this UGA expansion. One of these is a developed parcel based on current land use while the other site is a vacant parcel that has redevelopment potential, either as a large, splitable residential parcel or as a multi-unit residential development.

Summary

This proposed UGA expansion would only partially help meet growth allocations for housing but would provide utility services to parcels in Unincorporated San Juan County which are already urban in nature, directly adjacent to existing corporate limits, and have some development potential. Additionally, this proposed UGA expansion would alleviate past errors of corporate limits that resulted in Port-owned parcels near the existing Friday Harbor Airport to be under different jurisdiction. For these reasons, we recommend that the County consider adopting this area into the Friday Harbor UGA.

Exhibit 34. Summary of Capacity in Proposed UGA Expansion Area 3 - Draft Future Land Use

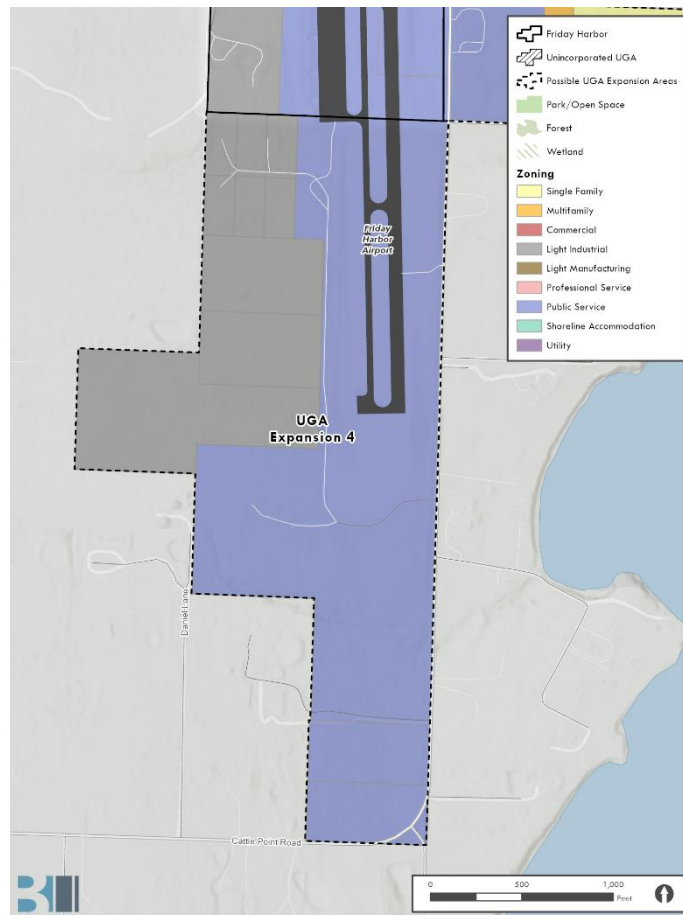
Zone Code	Net Parcel Acres	Vacant Net Acres	Underutilized Net Acres	Partially Utilized Net Acres	Developed and Excluded Net Acres	Total Buildable Acres (after Deductions)	Housing Capacity - Vacant	Existing Housing Units - Underutilized	Net Housing Capacity - Underutilized	Housing Capacity - Partially Utilized	Total Net Housing Capacity
ALT 1 MF-14	2.43	-	-	-	2.43	-	-	-	-	-	0
ALT 2 MF-20	2.43	-	-	-	2.43	-	-	-	-	-	0
ALT 3 MF-24	2.43	-	-	-	2.43	-	-	-	-	-	0
ALT 4 MF-26	2.43	-	-	-	2.43	-	-	-	-	-	0
ALT 5 MF-30	2.43	-	-	-	2.43	-	-	-	-	-	0
SF	10.03	-	-	10.03	-	7.12	-	-	-	28	28

Proposed UGA Area	AMI served	Capacity –Pre-Incentives	Capacity – Post-Incentives
3	0-80%	-	-
	80-120% (ADU)	3	6
	120+	28	28

Source: BERK, 2025

Proposed UGA 4

Exhibit 35. Map of Proposed UGA 4– Current Land Use



Source: BERK, 2025

Background

Proposed UGA 4 is characterized by several light industrial parcels to the West and the southern section of the Friday Harbor Airport runway along Hiking Trail and Shelter Road. All parcels in this proposed UGA including the partial runway parcel are owned by the Port of Friday Harbor. The westernmost parcels are zoned as light industrial and may help the town meet future employment allocations from the County if developed into additional support facilities for the Port of Friday Harbor. This proposed expansion would primarily serve to alleviate administrative mistakes with previous town boundaries excluding port owned properties under common use such as properties adjacent to the airport. The airport is considered an essential public use.

Criteria	Discussion
The area is already characterized by urban development	This area is under common use and ownership to adjacent Port-owned parcels to the North. It is in use for airport operations or related aviation uses.
The area is proximal to the Town of Friday Harbor corporate limits of areas characterized by urban development	This area is directly adjacent to the Town of Friday Harbor's corporate limits and other similar land uses.
The area has the ability to support urban levels of development	This area is already developed as part of the Friday Harbor Airport runway. Utility services are not currently provided to this area but there is capacity with a small amount of investment to provide these parcels with Town water, sewer, and solid waste services.
The area contains developed parcels under common ownership or use that are not under common jurisdiction and the proposed UGA would correct this administrative error. i.e. The Friday Harbor Airport property is partially within the town of Friday Harbor and partially outside of the town of Friday Harbor.	All parcels of this proposed UGA are currently owned by the Port of Friday Harbor and have similar land use to the adjacent Port of Friday Harbor property. This UGA expansion would alleviate this past administrative error.

Source: San Juan County CWPP; 2020

Size

The proposed UGA is 120.15 acres in which 29.5 acres are deemed “buildable” at least in part. Based on current employment density in light industrial areas, the light industrial parcels have estimated capacity for 77 additional jobs. While this is consistent across all light industrial areas of the city, the model used to estimate employment capacity by land use type does not distinguish parcels under common ownership with adjacent parcels which may not support the same number of new jobs as other light industrial parcels. Therefore, the estimate may be a slight over calculation.

Utilities

Utilities are not currently provided to this proposed UGA but would be if it were adopted into the FHUGA. Utilities include solid waste, sewer, and water. The 2020 wastewater management plan shows that upgrades to the existing wastewater treatment plant are necessary regardless of this proposed UGAs adoption. A sewer main extension and connections would be needed. Water resources are adequate to support this proposed UGA expansion per the 2013 Water System Plan. Solid waste facilities for the Town of Friday Harbor are currently adequate to support this proposed UGA expansion per the 2018 Solid Waste Management Plan, however additional collection days or packer trucks may be needed to accommodate growth regardless

in the town regardless of where the growth occurs based on an increased number of solid waste customers.

Land Use Patterns

The main feature of this UGA expansion is the southern portion of the Port of Friday Harbor-Airport. This parcel's current land use is designated as public service use. Additional parcels' current land uses are light industrial.

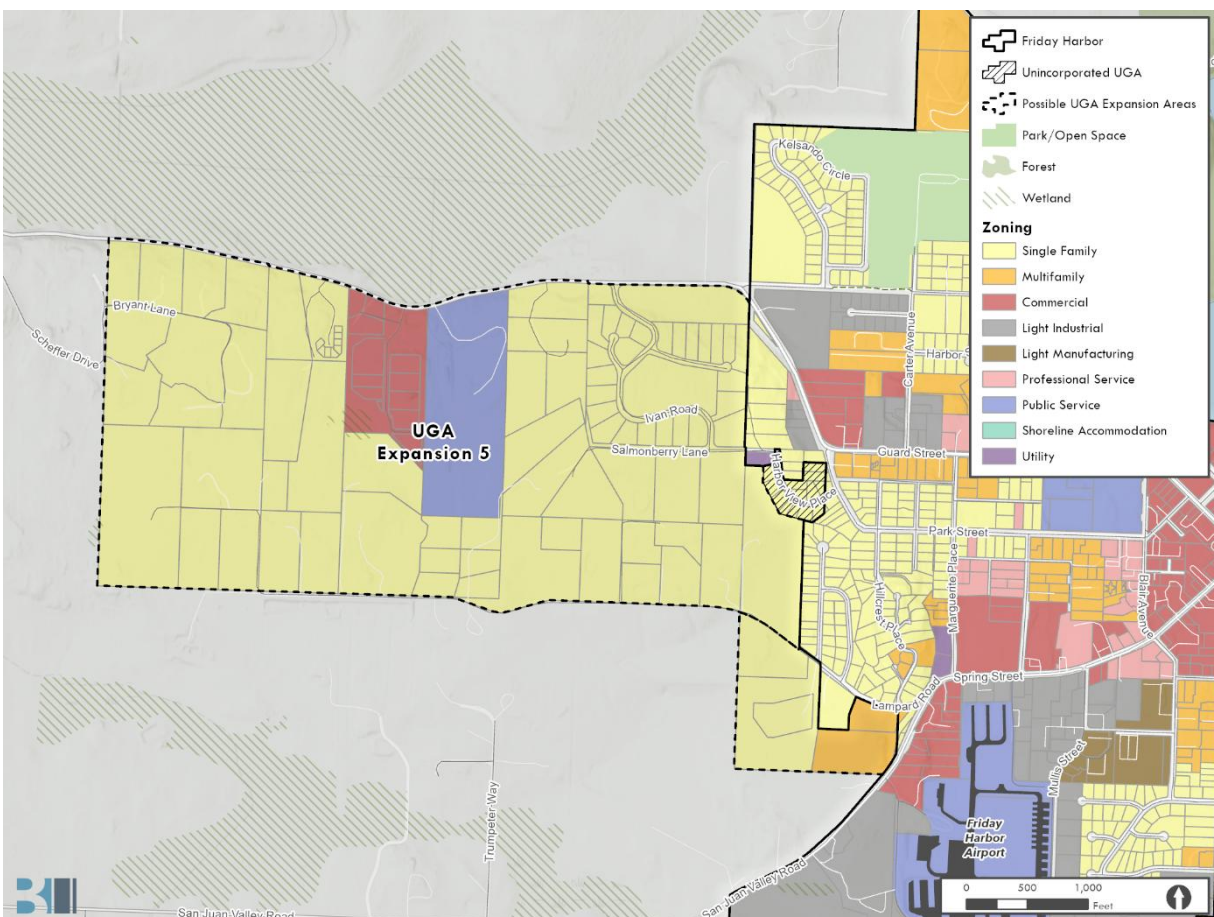
Summary

The main purpose of this proposed UGA expansion would be to alleviate past errors of corporate limits that resulted in Port-owned parcels near the existing Friday Harbor Airport to be under different jurisdictions. For these reasons, we recommend that the County consider adopting this area into the Friday Harbor UGA.

There is no associated housing capacity increase if this area were to be adopted and therefore no capacity exhibit.

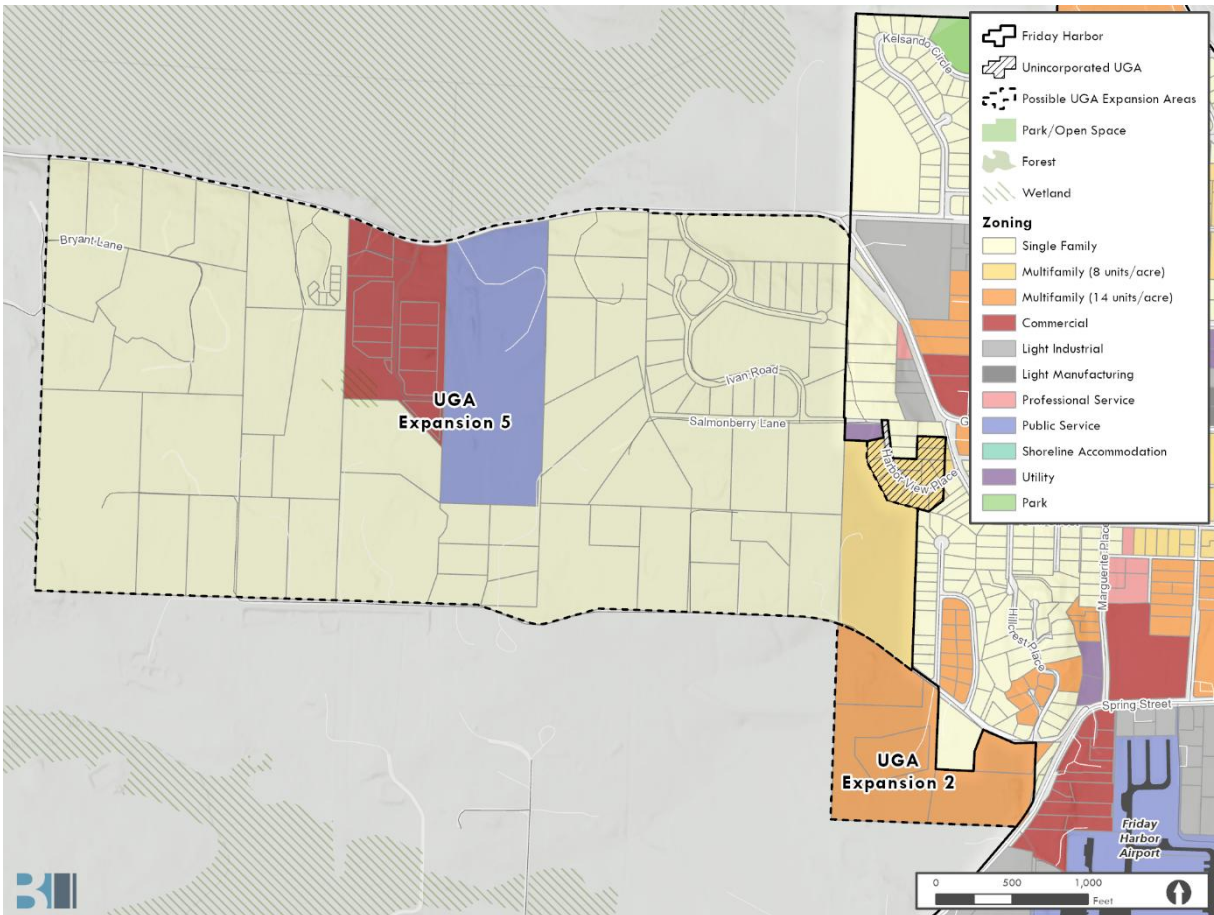
Proposed UGA 5

Exhibit 36. Map of Proposed UGA 5 – Current Land Use



Source: BERK, 2025

Exhibit 37. Map of Proposed UGA 5 – Draft Future Land Use



Source: BERK, 2025

Background

Proposed UGA 5 is characterized by several low-density developments, 13 commercial properties in a business park along Saltspring Drive, and one public use parcel that contains a maintenance facility for San Juan County Public Works. This proposed expansion would primarily serve to alleviate the housing shortfalls of the current town limits under current design standard and zoning code. However, the majority of properties are likely to retain low-density residential use if this proposed expansion were to be adopted. Additionally, based on Commerce guidance, this specific proposed UGA expansion would likely fail to sufficiently provide housing to extremely low-, low-, and moderate- income households due to the low-density nature of the current and anticipated land use, which is where there are capacity shortfalls in the town limits. The proposed UGA meets the following criteria:

Criteria	Discussion
The area is already characterized by urban development	While there are several vacant and partially utilized parcels on the land, many of the residential parcels are developed but do not meet the characteristics of urban development, rather the parcels more closely resemble sprawl or rural development.
The area is proximal to the town of Friday Harbor corporate limits of areas characterized by urban development	The proposed area is adjacent to the town of Friday Harbor on the northwestern boundary of the town limits with similar land use to nearby parcels within town limits.
The area has the ability to support urban levels of development	Utility service would require significant capital investment to provide sewer and water utilities to this particular proposed UGA expansion area. However, the capital facilities contain adequate capacity to meet the demand posed by this expansion.
The area contains designated critical areas and resource lands, and other lands with limited development capability as defined in a land use inventory	There are several wetlands throughout this proposed UGA, none of which would severely limit the development capability but may hinder efficient land use and land capacity maximization
In situations where the town's land capacity is insufficient in meeting growth allocations in housing and employment, The area either increases housing and/or employment capacity or increases the Town's public service provision capabilities.	If several of the "capacity-increasing provisions" are not adopted to meet growth allocations from the County and OFM, the town will require at least partial inclusion of this of this large residential portion of Unincorporated San Juan County to meet growth allocations. The employment centers in the commercial and public use areas of the proposed UGA may help the Town to meet employment allocation.

Source: San Juan County CWPP; 2020

Size

The proposed UGA is 235.36 acres in which 173.70 acres are deemed "buildable" at least in part. Based on current employment density in light industrial areas, the commercial parcels have estimated capacity for 44 additional jobs.

Utilities

Utilities that are not currently provided to this proposed UGA but would be if it were adopted into the FHUGA include solid waste, sewer, and water. Connecting sewer and water utility service is possible but would require significant capital investment. The 2020 wastewater management plan shows that with upgrades to the existing wastewater treatment plant that are necessary regardless of this proposed UGAs adoption, additional sewer capacity would

require a significant expansion to the Town's sewer mains including connections from residential and commercial structures. Water resources are adequate to support this proposed UGA expansion per the 2013 Water System Plan but additional home connections would be necessary. Solid waste facilities for the Town of Friday Harbor are currently adequate to support this proposed UGA expansion per the 2018 Solid Waste Management Plan, however additional collection days or packer trucks may be needed to accommodate growth in the town regardless of where the growth occurs based on an increased number of solid waste

Land Use Patterns

The main feature of this UGA expansion is the high number of single-family homes. It is unlikely that these parcels would be rezoned to MDMF or LDMF. Without adoption of the capacity increasing provisions laid out at the beginning of this document, buildable parcels in this proposed UGA expansion area would be developed at R-4 density and would provide predominantly high-income houses for those households earning >120% of the area median income.

Summary

This proposed UGA expansion would require significant improvements to utility infrastructure in order to provide a large number of low-density housing units in the planning period. While the capacity for low-density housing units is roughly 688 in the planning period in this area, adoption would not satisfy the requirements of the GMA. These housing units, without significant rezones and changes to the current and future land use would not likely serve those earning below 100% AMI per Commerce housing guidance and would therefore not help the Town to achieve its growth allocations for housing. Currently, the town has the surplus capacity for the same type of high-income housing that this UGA would serve in the planning period and adoption would contribute to sprawl in both current and future land use scenarios. For these reasons, we do not recommend that the County consider adopting this area into the Friday Harbor UGA.

Exhibit 38. Summary of Capacity in Proposed UGA Expansion Area 5 - Draft Future Land Use

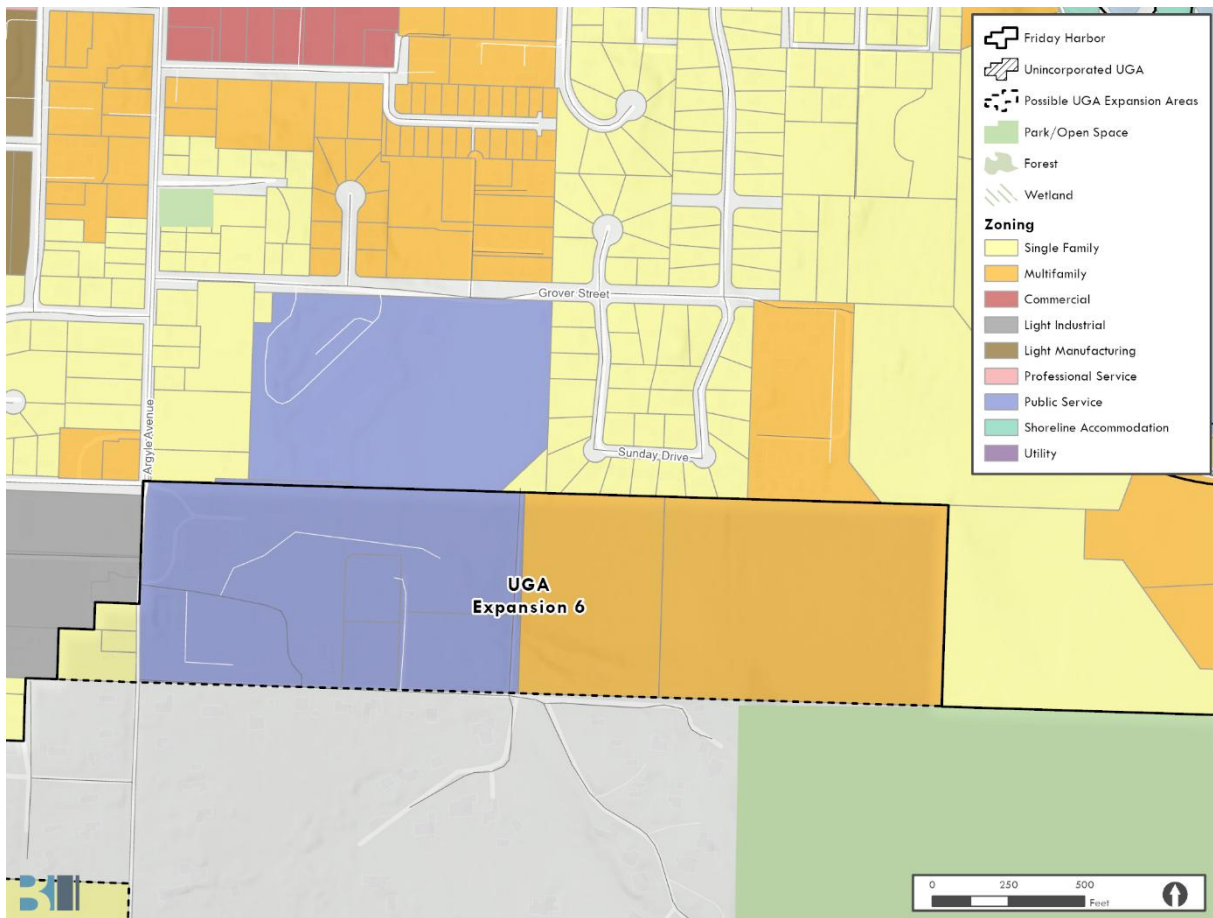
Zone Code	Net Parcel Acres	Vacant Net Acres	Underutilized Net Acres	Partially Utilized Net Acres	Developed and Excluded Net Acres	Total Buildable Acres (after Deductions)	Housing Capacity - Vacant	Existing Housing Units - Underutilized	Net Housing Capacity - Underutilized	Housing Capacity - Partially Utilized	Total Net Housing Capacity
CO	16.56	5.25	-	-	11.31	3.78	76	-	-	-	76
SF	265.58	62.68	-	181.95	20.95	170.66	180	-	-	502	682
MF-8	12.44	-	-	12.44		8.85	-	-	-	70	70

Proposed UGA Area	AMI served	Capacity -Pre-Incentives	Capacity - Post-Incentives
5	0-80%	-	-
	80-120% (ADU)	3	6
	120+	28	28

Source: BERK, 2025

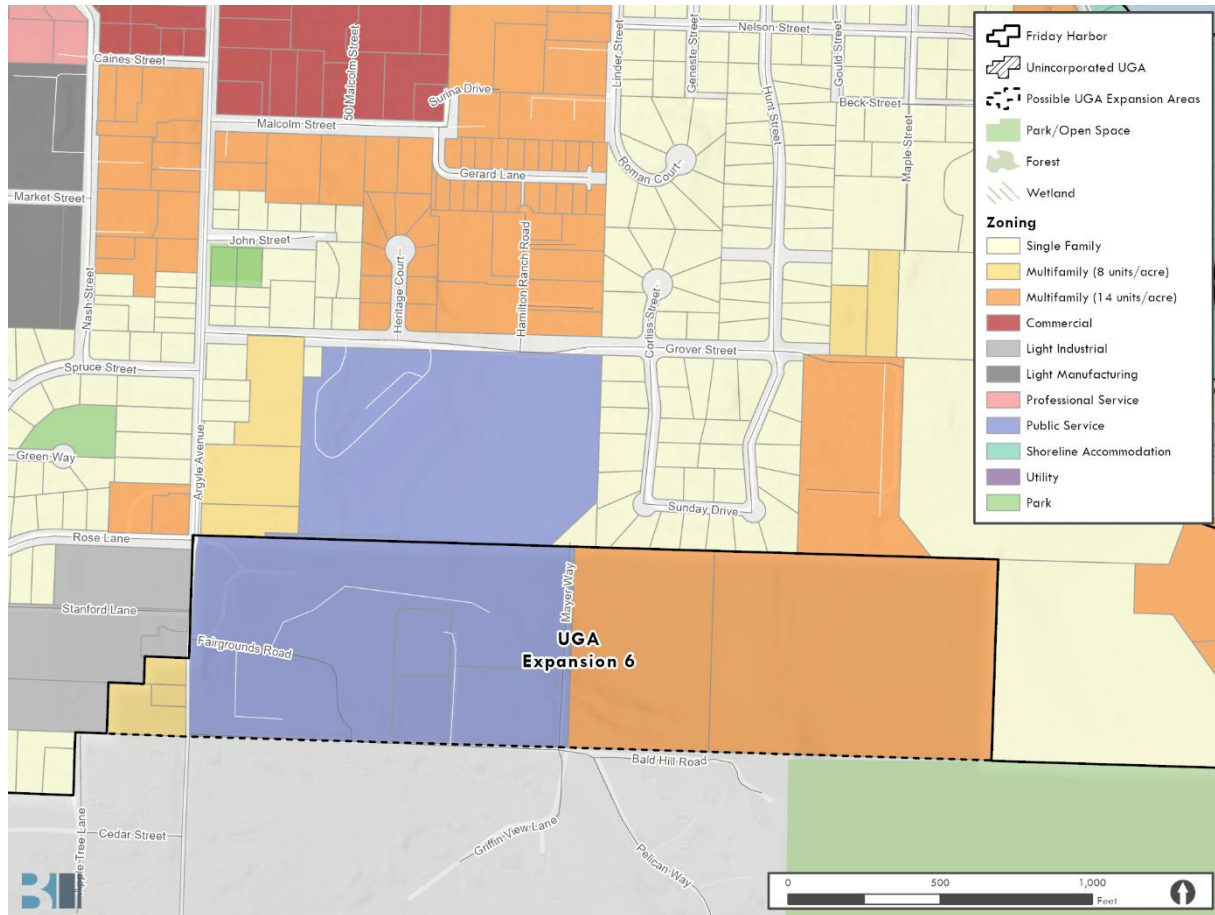
Proposed UGA 6

Exhibit 39. Map of Proposed UGA 6 – Current Land Use



Source: BERK, 2025

Exhibit 40. Map of Proposed UGA 6 – Draft Future Land Use



Source: BERK, 2025

Background

Proposed UGA 6 is characterized by six parcels directly south of current town corporate limits north of Dougherty Lane and Bald Hill Road. Two of these parcels have high future development potential in the planning period given their size and status as either vacant or partially utilized if converted to Moderate-Density Multi-Family Residential parcels. Currently all parcels on the Western side of the proposed UGA have public use as their current land use and include the San Juan County Fairgrounds. All public use parcels are excluded from the capacity model. This proposed UGA expansion includes other associated public use facilities as well.

Criteria	Discussion
The area is already characterized by urban development	While there are several vacant and partially utilized parcels on the land, many of the residential parcels are developed and meet criteria for urban development.
The area is proximal to the town of Friday Harbor corporate limits of areas characterized by urban development	The proposed area is adjacent to the town of Friday Harbor on the southern boundary of the town corporate limits with similar land use to nearby parcels within town limits.
The area has the ability to support urban levels of development	Utility providers have adequate capacity to meet the demand posed by this expansion. Water services are already provided to this proposed UGA but sewer and solid waste services are not currently provided.
In situations where the town's land capacity is insufficient in meeting growth allocations in housing and employment, the area either increases housing and/or employment capacity or increases the Town's public service provision capabilities.	The proposed future land use of the residential parcels of this proposed UGA expansion would help the town to meet its growth allocations.

Source: San Juan County CWPP; 2020

Size

The proposed UGA is 17.08 acres in which 10.08 acres are deemed “buildable” at least in part as Moderate-Density Multi-Family Residential parcels.

Utilities

Sewer and Solid Waste utilities are not currently provided to this proposed UGA. Utility extension is possible if the area were added to the FHUGA. The 2020 wastewater management plan shows upgrades to the existing wastewater treatment plant are necessary regardless of this proposed UGA's inclusion. To serve Proposed UGA #6, a sewer main extension and connections from residential and commercial structures would be needed. Water resources are adequate to support this proposed UGA expansion per the 2013 Water System Plan. Solid waste facilities for the Town of Friday Harbor are currently adequate to support this proposed UGA expansion per the 2018 Solid Waste Management Plan; however additional collection days or packer trucks may be needed to accommodate growth in the town regardless of where the growth occurs based on an increased number of solid waste customers.

Land Use Patterns

The main feature of this UGA expansion is the San Juan County Fairgrounds. Additional vacant and partially developed residential properties provide consistent land use when compared to nearby parcels and potential added capacity MDMF development adjacent to the Friday Harbor Elementary School and existing MDMF parcels.

The draft future land use map of this area does not change the land uses but rather would alter the land uses of adjacent parcels that are currently within town limits. These rezoned parcels would help to create a stepwise density increase that would ensure that the higher density parcels of this potential UGA expansion area were not jarring to the neighborhood and blended with surrounding land uses.

Summary

This proposed UGA expansion would require some improvements to utility infrastructure in order to provide utility services to these potential new developments. The capacity for MDMF housing is dependent on adopting capacity-increasing provisions but would be increased nonetheless by adopting this proposed area into the FHUGA. This part of the expanded UGA may help the town reach the low- and extremely low-income requirements of the GMA allocations. Additionally, adding the Fairgrounds to the FHUGA would alleviate the administrative uncertainty about utility use and create consistency between current and future use of the Fairgrounds. For these reasons, we recommend that the County consider adopting this area into the Friday Harbor UGA.

Exhibit 41. Summary of Capacity in Proposed UGA Expansion Area 6 - Draft Future Land Use

Zone Code	Net Parcel Acres	Vacant Net Acres	Underutilized Net Acres	Partially Utilized Net Acres	Developed and Excluded Net Acres	Total Buildable Acres (after Deductions)	Housing Capacity - Vacant	Existing Housing Units - Underutilized	Net Housing Capacity - Underutilized	Housing Capacity - Partially Utilized	Total Net Housing Capacity
ALT 1 MF-14	20.99	14.00	-	-	7	10.08	141	-	-	-	141
ALT 2 MF-20	20.99	14.00	-	-	7	10.08		-	-	-	
ALT 3 MF-24	20.99	14.00	-	-	7	10.08		-	-	-	
ALT 4 MF-26	20.99	14.00	-	-	7	10.08		-	-	-	
ALT 5 MF-30	20.99	14.00	-	-	7	10.08		-	-	-	

Proposed UGA Area		AMI served	Capacity - Pre-Incentives					Capacity - Post-Incentives				
6	0-80%		Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5
			141	201	241	262	302	197	281	337	366	423
			80-120%									
			120+									

Source: BERK, 2025