


# Sophia Cassam

**From:** joe symons <joesymons@me.com>  
**Sent:** Wednesday, July 19, 2023 8:13 AM  
**To:** Sophia Cassam  
**Cc:** James McCubbin; David Turnoy; Toby Cooper; Michael Johnson  
**Subject:** Docket Request by Friends of the San Juans re: changes to bed and breakfast definition in SJC

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I have read the docket request submitted to San Juan County by James McCubbin, Friends of the San Juans, on 9 Feb 2023, available at


 SAN JUAN COUNTY DEPARTMENT OF COMMUNITY DEVELOPMENT  
135 Rhone Street, PO Box 947, Friday Harbor, WA 98250  
(360) 378-2354 | (360) 378-2116  
dcd@sanjuancc.com | www.sanjuancc.com

DATE RECEIVED

**Comprehensive Plan Text/SIC Code\* Amendment Request**  
\*San Juan County Code Titles 15, 16 & 18 (Annual Docket)

APPLICANT INFORMATION:	
Name of Applicant: Friends of the San Juans	Name of Agent: D. James McCubbin
Address: P.O. Box 1344	Address: P.O. Box 1344
City, State, Zip: Friday Harbor, WA, 98250	City, State, Zip: Friday Harbor, WA, 98250
Phone: 360-298-7615	Phone: 360-298-7615
Email: james@sanjuans.org	E-mail: james@sanjuans.org

This request is for a text amendment to the Comprehensive Plan or development regulations, not a comprehensive plan map amendment. I understand that this request will be reviewed according to the County's annual docket process.

 D. James McCubbin Feb. 9, 2023  
Signature Printed Name Date

**Please Describe the Proposed Amendments (attach additional pages if you need more space):**

- Comprehensive Plan amendments (if applicable). Describe proposed amendments and/or attach proposed text changes. List Comprehensive plan section, page numbers, title and policies proposed for amendment.  
N/A
- San Juan County Code Title 15, Title 16 or Title 18 amendments (if applicable). Describe proposed amendment and/or attach proposed text changes. List code sections proposed for amendment.  
Revises San Juan County Code, Title 18, section 18.20.020 "B" definitions, definition of "Bed and breakfast residence", as follows (underlining indicates proposed language to be added):  
"Bed and breakfast residence" means a hospitality commercial use containing one to two lodging units without cooking facilities, which provides overnight accommodation and must provide daily hot breakfast meals which are prepared on site, in an owner-occupied existing single-family residence that is entirely contained within a single building including the owner-occupied portion and all lodging units.

Docket\_Code-Text-Amend-Req-Friends-of-San-Juans-2-9-2023-1  
PDF Document · 330 KB

I fully support the docket request. I do not want additional vacation rentals on Orcas gaming the system by claiming to be bed and breakfast facilities.

As any observer would note, the decision to place a cap on the issuance of new vacation rental permits was not based on any analysis of the impact of those facilities. It was entirely a political decision and not a decision that emerged from any public and DCD planning process.

The spirit and legality of the cap should not be compromised by a faulty definition of a hospitality service.

Please recommend that the definition change proposed by McCubbin be advanced to the Planning Commission with a positive recommendation that the definition be changed.

Thank you

Joe Symons  
Olga WA