

# Lindsey Schromen-Wawrin

Department of Ecology,

Washington State is suffering a housing shortage. Department of Commerce policy analysts recommend a 6% rental vacancy rate. In Port Angeles, the vacancy rate is currently less than 2% -even worse than Seattle. Department of Commerce recommends building more small housing units in order to solve this housing shortage.

We would like to encourage development of high-density housing in central Port Angeles. Creating more population density in central Port Angeles has many urban benefits, including less per capita car use, and less impervious surface area per capita.

One key barrier to high-density infill development in Port Angeles, and thus one key barrier to solving the affordable housing crisis, is the requirements of the NPDES Phase II stormwater permit. Rather than attempt to build in Port Angeles, many developers are going outside the city. This results in more sprawl and more personal vehicle use.

Please consider stormwater permit requires that would not create a barrier to high-density infill development in central Port Angeles. For example:

(1) Regulate stormwater consistently across the Port Angeles region (e.g., by watershed, like all of WRIA 18), not just within the city limits, as otherwise the stormwater requirements create an incentive to build right outside the City. Note that Port Angeles' city limit does not even extend as far as the Port Angeles Urban Growth Boundary so at a minimum, regulate stormwater within the Port Angeles UGA, not simply within the City limit. Ideally, regulate the whole region so that there is no incentive to avoid stormwater requirements by building in unincorporated areas.

(2) Consider population density in stormwater mitigation requirement calculations. This would incentivize higher density developments, where there are more people per area of impervious surface.

Without these changes the stormwater requirement creates a perverse incentive for developers who will continue to build sprawl outside the city, rather than high-density infill development in the central City. The result of this, in the long run, will be more personal vehicle use, and more overall land cover in buildings and roads (at the expense of, primarily, forested land cover). I think it would be better for the environment here in general, in the long run, to have compact high-density housing and less vehicle use. Please don't require stormwater regulations that work against this long-term goal.

Thank you,  
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