



## San Juan County Community Development & Planning

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DATE: May 5, 2008

### Staff Report

TO: COUNTY COUNCIL

THRU: PETE ROSE, COUNTY ADMINISTRATOR

FROM: COLIN MAYCOCK, SENIOR PLANNER, DON KEHRER,  
PLANNING CONSULTANT

MEETING DATE: May 20, 2008

SUBJECT: 2008 EASTSOUND URBAN GROWTH AREA LAND SUPPLY  
ANALYSIS

ISSUE:

To approve a resolution adopting the findings of the Eastsound Land Supply Analysis and affirming the existing boundary of the Eastsound Urban Growth Area (UGA).

EXECUTIVE SUMMARY:

The Western Washington Growth Management Hearings Board (GMHB) Final Decision and Order, Case No. 05-2-022c, June 20<sup>th</sup>, 2006 regarding the Eastsound UGA found that in order to be considered compliant, the county would need, in part, to;

1. 'Show its work' with regard to projected land needs for Commercial and Institutional development within the UGA.
2. Show that there are specific circumstances that justify the less than urban densities of some parcels.

The 2008 Land Supply Analysis shows that there is sufficient land available within the Eastsound UGA to meet the needs of the projected population for Commercial, Residential and Institutional uses through 2020. In essence, the county projects future commercial development at a Floor Area Ratio (FAR), of .30, a FAR that is in keeping with long term development trends in the Village Commercial District; the county also shows that the existing institutional uses have sufficient space to

expand in place without exceeding the lot coverage permitted by the Eastsound Subarea Plan and that there is also adequate land in place to allow for the development of unexpected institutional uses; finally the land supply analysis shows that there is sufficient land for residential uses at the already permitted densities.

San Juan County is planning to house 50% of the projected population growth on Orcas Island within the Eastsound UGA defined in Ordinance 13-2005. The current UGA provides space and zoning sufficient for up to 687 residential units. The population increase will raise demand for commercial goods and services. As shown below, while approximately 8.6 acres will be needed to meet the increased demand for commercial activities, the Village Commercial district contains approximately 16 acres of potentially developable land. Concomitant with the population increase, there will be an increased demand for existing and approximately 6 new Institutional uses, all of which can be met within the UGA boundary.

The 2005 UGA contained a number of parcels that were zoned at less than urban densities, the 2008 Land Supply Analysis details both the specific reasons why they should be in the UGA and, simultaneously, why increased density is an inappropriate use for these parcels. The particular reasons for limiting future development on these parcels are tied to the presence of flood zones, archaeological sites and steep slopes.

#### BACKGROUND:

The Eastsound UGA was first adopted by San Juan County in October 2000. It covered approximately 1,263 acres and was entirely within the 1,767 acre Eastsound Planning Area. In preparation for establishing the UGA, San Juan County Planning staff published a report entitled, Analysis of Proposed Urban Growth Areas (UGAs), Activity Centers and Residential Activity Centers<sup>1</sup>. This report determined that of the 1,263 acres in the UGA only 657 acres were potentially available for further development. The County planners opted to set aside 117.2 acres not available for residential development and ultimately determined that there were 540 acres available within the original Eastsound UGA for residential development.

The 2000 proposed Eastsound UGA was appealed to the GMHB and in response, the County contracted with Seattle's EDAW Inc. to prepare a land supply analysis that would detail the rationale for the 1,263 acre UGA. The EDAW study, titled Technical Memorandum, San Juan County Eastsound UGA Plan Revision: Analysis of Land Use, published in December 2001 and revised January 2002, was premised on the County's previous work, inappropriate analogies and generic planning premises that did not reflect the demographic and economic profile of San Juan County in general and Eastsound in particular<sup>2</sup>. The EDAW study did not involve the much more rigorous parcel by parcel analysis that the 2005 land supply analysis, and those following, was based upon. Despite the criticisms of the EDAW methodology and results, the report has been used in the past to challenge subsequent, different Land Supply studies for the smaller UGA proposed in 2005.

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<sup>1</sup> August 9, 2000 and updated September 28, 2000.

<sup>2</sup> See the commercial land supply discussion below.

The attached 2008 Land Supply Analysis, Exhibit A, was prepared in response to the June 20, 2006 Compliance order of the GMHB. In their June 20, 2006 order the Board concluded that while the 25% market factor for the Eastsound UGA was compliant<sup>3</sup> with the Growth Management Act (thereby eliminating the market factor in the Eastsound UGA as the basis of future appeals), the County's failure to show its work for commercial and institutional land needs and to adequately analyze the needed land for commercial and institutional uses was clearly erroneous and did not comply with the act.

The 2008 Land Supply Analysis was completed in September 2007 and submitted to the Eastsound community for review and comment. The analysis was revised in response to new information from the community and a final 2008 Land Supply Analysis was presented to the Planning Commission for review and approval in April 2008. The 2008 Land Supply Analysis was approved by the Planning Commission. Following the Planning Commission's recommendation for approval, Staff determined that additional information regarding the methodology, premises and results of the 2008 Land Supply Analysis should be presented in order to clarify the county's position vis a vis the EDAW report and preempt further insupportable criticisms based upon the 2001 document.

## DEMAND FOR COMMERCIAL LAND

The 2008 Land Supply Analysis demonstrates that about 6.9 acres of commercial land would be needed to meet the demand for commercial goods and services over the period from 2005 to 2020 during which time the population of the Orcas Island is anticipated to increase by about 1,913 persons. This demand figure is less than the figures projected in the EDAW Report prepared in 2001. The EDAW report includes two estimates of commercial demand based upon two different, non Eastsound specific commercial land use premises.

The first estimate was based on county Staff's premise in 2000 that about 12 acres of commercial land is needed per 1,000 residents, (approximately 522 sq ft per person) to satisfy anticipated demand. The 2000 Staff estimate is found on page 20 of the August 9, 2000 (updated September 28, 2000) titled Analysis of Proposed Urban Growth Areas (UGAs), Activity Centers, and Residential Activity Centers, which in turn was derived from a 1990 CTED publication, Shaping Your Future: A Guide to Designing an Urban Growth Area, by Gail Easley that is no longer available. The 2000 analysis states that: "One estimate of commercial need is a calculation based on surveys of commercial developed land in medium-sized cities. It is observed that such areas characteristically require about 12 acres of commercial area per 1000 population." Following the County's report, the EDAW report repeated this estimate, which resulted in a total future demand based on this methodology of about 28 acres, (638 sq ft per new island resident).

The second estimate for the demand for commercial land in the EDAW report was based on the projected increase commercial employment over the planning period and then dividing the anticipated increase in the number of employees by the ratio

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<sup>3</sup> June 20, 2006, WWGMHB FDO pg. 24 states "Therefore the board finds that the market factor used in determining the size of the Eastsound UGA is in compliance with RCW 36.70A.320 (1)."

of 12 employees per acre. The ratio of 12 employees per acre of commercial land was obtained from the Clark County, Draft 2001 Usable Lands Report. Following this methodology, the estimated demand for commercial land was 36 acres, (819 sq ft per new island resident<sup>4</sup>).

Both these methods rely on commercial demand data from areas that are not representative of the characteristics of San Juan County in general and Eastsound in particular. The first estimate relies on commercial demand data from medium sized cities. The second methodology relies on employment to commercial land demand ratios from Clark County, whose population in 2000 was around 345,000. In addition neither of these methodologies examined how the demand ratios related to the density and intensity of either existing commercial development or that of the future.

If challenged, Staff does not believe the EDAW estimates would be defensible. As opposed to either projecting land needs upon the basis of a generic measurement of commercial land per 1,000 of population or an equally generic presumption of number of employees per acre, Staff used data on existing commercial development in Eastsound in order to understand the nature of the demand for commercial land in Eastsound and therefore project commercial land requirements that accurately reflect the needs of Eastsound in the future. Staff based projected demand on the basis of the square footage of built commercial space rather than simply on land area. This methodology ties demand to actual commercial space rather than commercial land and, consequently, provides a more accurate measure of how commercial demand is expressed by commercial development. The Floor Area Ratio (FAR) can then be used to measure how commercial land consumption is affected by commercial demand. The higher the FAR, the less land is consumed per unit of demand. Staff concluded that demand for commercial goods and services over the planning period from 2005 to 2020 could be satisfied by approximately an additional 90,000 square feet of built commercial space. At a FAR of 0.3 this would consume about 6.9 acres of land. This is a conservative estimate because it assumes that the commercial demand from a population increase of 1,913 persons on Orcas Island will be met in the Village Commercial district of Eastsound.

If the EDAW analysis were to be followed then, at the current average FAR for commercial space in the Village Commercial District of 0.27, the demand for commercial floor space over the planning period would need to be about 365,000 square feet to absorb 28 acres of commercial land and 423,403 square feet to absorb 36 acres of land. The first figure is larger than the combined total of the commercial space in the Village Commercial area of Eastsound in 2005 and the second figure is about double that space. Even including the assumption that all commercial activities are at the very edge of their capacity and that any new customers would require additional space, it seems logically difficult and demographically unlikely that a population increase of 39 percent from 2005 to 2020 will require one to two times as much commercial space than existed in 2005.

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<sup>4</sup> The 2008 Land Supply Analysis shows that currently there is approximately 47.2 sq ft of commercial space per capita for the island as a whole.

Finally with respect to accessory uses to a commercial development such as parking, outside seating and open-air sales, in the Village Commercial District of Eastsound, only 10 percent of the site is required to be in open space, i.e. free of impervious surfacing. At a FAR of 0.3, the building foot print would only cover 30 percent of the site. The remaining 60 percent of the lot area not occupied by the building and not part of the open space would be available for parking or other accessory uses.

## DEMAND FOR INSTITUTIONAL LAND

The 2008 Land Supply Analysis identified that about 3.4 acres of land would be needed to meet the demand for an estimated 6 new institutional uses over the period from 2005 to 2020 during which time the population of the Orcas Island is anticipated to increase by about 1,913 persons. This demand figure is less than the figures identified in the EDAW Report prepared in 2001.

The 2001 EDAW report states “Eastsound is projected to need between 57 and 90 acres for additional institutional development over the 20 year planning period.” Those projections were calculated based on a formula provided by the County from the 2000 Land Supply Analysis that estimated that new institutional uses would consume about 15 percent of the total developed land (residential, commercial and industrial) within the UGA. That section of the report reads, in part, as follows:

### *Institutional*

*An increase in the utilities, schools, and services will occur as population increases. An additional elementary school seems possible by the end of the planning period. Other community uses will emerge or expand, requiring further space to be made available. Many of the institutional uses, such as schools, some utility uses, and community clubs, can locate outside of the Village Commercial, SP/ S&LI, and even Village Residential districts.*

*Snohomish County conducted some research into the estimation of public facilities needs. Their General Policy Plan states that “research on public purpose land (excluding streets) as a percentage of total developed land in Snohomish County and in other U.S. metropolitan areas suggests that this percentage should be in the vicinity of 15%.” Similar figures have been observed in Kitsap County and elsewhere.*

As with the estimate of demand for commercial land, the methodology used for institutional demand relied on data from an area that is not representative of the economic and demographic characteristics of San Juan County. Furthermore, not only was the data from a much more urbanized area, the data used was gathered for public facilities rather than institutional uses. In addition to using a generic non-representative methodology, the reference to and results of the Snohomish study were, at best, vaguely described. Again, the absence of specificity promoted an inflated estimate of land needs for institutional uses and an estimate that was entirely inconsistent with the 2005 Eastsound UGA. For these reasons, Staff did not believe that the EDAW estimates, based on an imprecise reference to a study developed in

an urbanized area that “suggested” 15 percent as a factor, would be defensible if challenged.

Instead, Staff developed and used data on existing institutional development in Eastsound in order to understand the demand for institutional land in Eastsound. Through this analysis it was determined that the contemporary institutional uses could expand on their existing sites to meet the future demand for those specific uses over the planning period. The 2008 Land Supply Analysis showed that an additional 3.4 acres of land, potentially needed to for new institutional uses coming into the community, could be accommodated within the land surplus added to the residential and commercial land supply by the 25 percent market factor. The express purpose of which was to account for land not used for either residential or commercial uses.

Staff has re-contacted institutional uses that were originally contacted during the preparation of the 2008 Analysis and further contacted others including the Orcas Historical Museum, a number of churches and private schools to confirm the premise that existing institutional uses would expand on site if expansion was needed. This assumption was confirmed by the Institutional uses themselves. Users contacted stated they would expand on site and had the land area to do so if growth warranted. There were those who expected no to need to expand (Orcas School District), while others had recently updated or built new facilities (museum, Episcopal Church, Catholic Church), and some were making plans to expand on site (library, Christian School, Children’s House). One church organization that is currently renting space in Eastsound has not been able to find a suitable 1-acre site for a new facility within its price range. For smaller institutional uses with limited funds, affordability rather than availability is likely to have a greater affect on their ability to find a suitable location for a new facility.

When recently contacted<sup>5</sup>, Orcas School District reiterated that there seemed little likelihood that over the next 10 to 15 years enrollment would increase and even less likely that enrollment would increase to the point that an expansion of the existing facilities would be required. Although a number of private schools have opened in Eastsound, combined these private schools serve less than 23% of the enrollment in the School District, or a ratio of approximately 5:1. While it is unlikely that there is a direct correlation between the decline in enrollment in the Orcas school district and the development of private schools<sup>6</sup>, between 1999 and 2008 the enrollment in public school has decreased by 24%. The decline in the enrollment in the Orcas School district has not far outstripped the enrollment in private schools, however, while there may be a superficial correlation, it is clear that the very best that can be said is that the number of school age children on Orcas that attend schools on the same island has stagnated and shows no sign of improving. As noted in the 2008 Land Supply Analysis, enrollment has declined over the past ten years of so and the District anticipates that it may decline further.

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<sup>5</sup> Within the last 30 days.

<sup>6</sup> Staff believes that a high percentage of students subsequently enrolled in the Christian School were home schooled prior to its opening.

## MARKET FACTOR

In its October 15, 2002 Final Decision and Order for Case #02-2-0008, the WWGMHB ordered the county to reconsider the 100 percent Eastsound market factor. The residential market factor was reconsidered in the 2005 Eastsound UGA analysis resulting in the establishment of a new residential market factor of 25 percent for Eastsound. In addition, a seasonal market factor was also established for Eastsound in recognition of the unique impact seasonal housing has on the supply of residential land in San Juan County, which has the net impact of creating a 50% surplus in the land supply. In their June 20, 2006 Compliance Order, the Board found the new market factor to be compliant.

The June 20, 2006 Compliance order also required that the County show its work with regard to commercial and institutional land supply in Eastsound. In this analysis, staff has included a 25 percent market factor for commercial land and no market factor for institutional land because the Board had already determined this strategy to be compliant for Eastsound.

## COMMERCIAL LAND SUPPLY MARKET FACTOR

With regard to the market factor for commercial land, staff was mindful of the frequently cited decision of the Central Growth Management Hearings Board in Case #95-3-0039c Bremerton regarding the role of market factors in sizing UGAs. The pertinent section of that decision reads as follows:

### **Market Factors in Sizing the UGA**

The sizing of UGAs remains dependent upon an accounting exercise requiring a reasonable relationship between its selected size and the likely future population for each county. With regard to the question of the permissible size of a “land supply cushion” or “market factor,” several conclusions are in order.

The Board has previously held that a county may size its UGA with more land than is required to meet the demands of 20 years of projected growth. See *Tacoma*, at 10. This “excess land supply” may be called a “market factor,” as EHB 1305 does, or a “safety factor” or “cushion.” What a county chooses to call such excess land supply does not matter so much as that such a factor is explicitly quantified and expressed as a percentage of land beyond the minimum necessary to accommodate the OFM projected growth, at the land use densities stated in each jurisdiction’s land use map. Sec. 2 of EHB 1305 further establishes that such a market factor must be “reasonable.” This legislative directive embodies the Board’s prior holdings. Not only must the UGA be based on the OFM population projection, but at *some* point of excess capacity (i.e., with some added market factor), the size of the UGA is not reasonable.

**While it is difficult to draw an absolute limit beyond which a county may not go in using such a factor, the Board holds that a “market factor bright line” will be drawn at the 25 percent threshold.** [emphasis added]

by County Staff] The Board takes official notice of the DCTED publication, *Issues in Designating Urban Growth Areas — Part I — Providing Adequate Urban Area Land Supply*, March 1992. Citing several approaches in other growth management states, this publication discusses the concept of an excess land supply and the need to strike a balance in sizing UGAs so as to contribute neither to sprawl nor to increased housing costs. It reports the results of national research by F. Stuart Chapin and Edward J. Kaiser:

... a [safety factor] allows for unanticipated choices of individuals and firms who may acquire land in excess of the anticipated need, and it allows for land which may be held out of use because of personal preferences or whims of a few property owners or because of legal complications which make the land unavailable for immediate development. However, they caution that the excess should not be more than 25 percent... When community plans provide a residential land supply, which is more than 25 percent of the area needed to accommodate projected growth, the Florida Department of Community Affairs reviews the plans more closely. *Issues in Designating Urban Growth Areas- Part I — Providing Adequate Urban Land Supply*, at 16-17.

The Board concludes that this is a prudent approach to implement the legislature's direction that a "reasonable" market factor may be included in sizing the UGA. Where counties adopt a land supply market factor between 1 and 1.25 (i.e., of 25 percent), the Board will presume that the factor is reasonable. In evaluating allegations that a county has used an unreasonable land supply market factor, the Board will give increased scrutiny to those cases where the factor exceeds the 25 percent bright line. In determining whether the county's choice was reasonable, the Board shall consider three general questions:

*(1) What is the magnitude of the "land supply market factor" beyond the 25 percent bright line?* Exceeding the 25 percent threshold by ten percent (thus utilizing a factor of 35 percent) is a very different circumstance than exceeding it several-fold (for example, utilizing a 75 percent excess supply). At some point, the exception swallows the rule. The greater the degree the county's land supply exceeds the 25 percent bright line, the more closely the Board will scrutinize the record for the indicators described in (2) below and consider remanding the UGA with direction to include the approach described in (3) below.

*(2) Is there other evidence to suggest that the land supply market factor is not reasonable?* Various indicators might suggest that a large excess land supply (i.e., 25 percent+) was the cumulative or inadvertent consequence of failures to comply with other requirements of the Act, rather than the deliberate addition of a "market supply" increment beyond the land supply that is necessary for the projected growth. If the preponderance of the evidence in a record so indicates, the Board would find the "market" factor not reasonable. For example, was the UGA sized using the criteria listed in RCW 36.70A.110? Did the County "show its work"? Were a variety of rural densities included? Has there been a showing that the cities within the

county, as evidenced in their adopted GMA comprehensive plans, cannot accommodate more population and employment than was allocated by the county? Does the county's capital facilities element indicate that adequate services will be available for the type and density of uses designated both for the UGA and the rural area? Are the types and densities of land uses allocated to the rural areas violative of the Act's prohibition against urban growth in a rural area?

*(3) Has the county also availed itself of other approaches, such as continuously monitoring land supply and making necessary adjustments over the life of the plans for the county and its cities? The Act requires that counties adopt a UGA of sufficient size to accommodate 20 years of projected growth. However, the market factor is not the only device available to achieve a supply that is neither too large nor too small. The Act also requires review of UGAs at least every ten years (RCW 36.70A.130(3)); frequent amendments to the CPPs. Although the size of the UGA should not be increased in a frequent or cavalier manner, counties should consider the option of including a more modest land supply market factor at the beginning of the twenty-year period, and considering adjustments on a three- or five-year cycle. If, in answering questions 1, 2 and 3, the Board concludes that the land supply market factor above 25 percent is not reasonable (i.e., it is too large), the UGA will be remanded.*

*End of Text of Hearings Board Decision*

Staff found there were no special circumstances relating to commercially zoned land in the Eastsound UGA that would suggest that no market factor was needed, however, simultaneously there was no obvious evidence that a market factor that was greater than 25 percent was necessary. Most of the commercially zoned land is in private ownership and its availability for development is subject to the willingness of the owner to either develop or sell. In that regard it can be expected that some potentially developable land will be withheld from sale. In addition, the Village Commercial land use designation allows uses other than commercial. Consequently it is likely that some properties zoned commercial could be developed with non-commercial uses. As a result staff determined that there was evidence to support a market factor at the upper limit of the "market factor brightline scale, but lacked sufficient evidence to support the need for a market factor greater than 25 percent." Furthermore, as the Growth Board had already approved a market factor of 25 percent as sufficient and compliant for determining the size of Eastsound UGA and thereby eliminated questions regarding the market factor as the basis for appeals, Staff determined that the market factor was unassailable. Due to the scale of the Eastsound UGA and the County's ability, through its GIS system, to almost continuously monitor development in Eastsound, Staff will be able to keep an eye on the land supply and make adjustments when warranted.

## MARKET FACTOR FOR INSTITUTIONAL LAND

The County does not have a distinct Institutional Land Use District. Institutional uses are allowed in a number of different land use districts within the Eastsound UGA or within the County proper, as either an outright permitted use or a use requiring

administrative or quasi-judicial review and approval. Table 2 of the 2008 Land Use Analysis shows the range of institutional uses and the various land use designations in the Eastsound UGA where they would be allowed.

Unlike commercial and residential land uses, institutional land uses<sup>7</sup> are not solely, if at all, developed in order to generate profits for either the land owner or the organization. Nearly all institutional uses, if not the institutions themselves, have a high minded purpose that pushes the institution to strain against the lure of lucre. So while it's possible for a small private school, hospital or even a church to make a profit, they are not created and developed with that as their primary object. In this respect and largely due to it, institutional uses are remarkably resistant to market forces. While commercial land uses are a response to a demand that can be met through the nexus of exchange, institutional uses are a response to a different kind of demand or an absence that cannot be filled via monetary exchange mechanisms. Simply put, institutions, by their nature, do not serve commercial ends and so do not require the consideration of a market factor when determining whether there is sufficient land available to meet projected future demand. However, while sufficient land may be available, the high cost of that land in Eastsound may limit the ability of institutions to find a suitable location.

Projecting the future demand for institutional uses is fraught with difficulties. While there's no guarantee that 500 Mormon's won't move to Orcas Island tomorrow, thereby changing the demand for a Church of Latter Day Saints quite dramatically, equally there's no guarantee they will move to Orcas Island tomorrow (or at any time) either.

While it's important to keep the institutional resistance to market forces in mind when distinguishing between institutional, residential and commercial land uses, one cannot assume that any attempt to project future demand is doomed from the outset. The 2008 Eastsound Land Supply Analysis adopts a very conservative position with regard to both future demand for land for institutional uses and shows how the demand is evaluated and how the land requirement can be met within the Eastsound UGA.

The market factors for residential and commercial lands were established to take into account the facts that not only would some residentially and commercially zoned land be held off the market, some of this residentially and commercially zoned land would be developed with other than residential or commercial uses which could include institutional uses. As a result of the residential and commercial market factor approximately 31 acres was added to the UGA. The projected 3.4 acres for new institutional land uses is equal to approximately 11% of the excess 31 acres set aside for non commercial or non residential uses through the respective market factors. It was determined that the total excess land was sufficient to meet the potential demand for further institutional uses.

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<sup>7</sup> As defined by UDC 18.20.090 "structures and related activity areas used by organizations providing educational, social or non commercial recreational services to the community, including performance halls, government service offices, facilities for assembly, colleges, primary and secondary schools, museums and libraries."

## THE PLANNING HORIZON

As noted in the body of the 2008 Eastsound Land Supply Analysis, the August 2007 WWGMHB FDO in case # 97-2-0060c, *Abenroth v Skagit County*, notes that the use of a different planning horizon in a subarea plan to that of the Comprehensive Plan, would be in violation of RCW 36.70A.070 and 36.70A.080 (2). The continued use of the 2020 planning horizon in the 2007 Land Supply Analysis is, while apparently incongruous, appropriate for a project that began in 2000 and reflects the same population presumptions that the current UGA is based upon. Despite the anachronism inherent in the use of older population data, staff notes that the most recent population projections from the Office of Financial Management show that one possible population increase scenario in Eastsound would be approximately 356<sup>8</sup> people by 2020 rather than the 956 increase proposed in 2005. If the same calculation is done for the medium projection series, the population in Eastsound is expected to increase by 817 people by 2020 rather than 956, a 14.5% decline in the projected population. If this population reduction were to be carried over to the required residential units, the UGA would need to provide sufficient space for only 575 homes.

In maintaining the use of the 2020 planning horizon and the original population figures, the County is not only obeying existing regulations, but also using a more conservative premise for justifying the current UGA boundaries and potential for future growth.

### EXHIBITS:

A: The 2008 Eastsound Land Supply Analysis

B: The Resolution Approving the Eastsound Land Supply Analysis and Affirming the Eastsound Urban Growth Area Boundary

### FINDINGS:

- A. There is sufficient land available in the current Eastsound UGA boundary to meet the housing needs of the projected population growth.
- B. There is sufficient land available in the current Eastsound UGA boundary to meet the projected needs for commercial uses.
- C. There is sufficient land available within the current Eastsound UGA boundary to meet the projected needs for institutional uses.
- D. On those shoreline parcels impacted by wetlands, poor soils, flood zones, archaeological sites and steep topography, there are sufficient local environmental reasons to maintain their less than urban density designations.

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<sup>8</sup> From the November 2007 OFM final projections, low series; San Juan County projected population is 17,937, Orcas makes up 31.6% of the county's total population, 5668 – 4956 (Orcas population 2005) = 712, 50% to Eastsound = 356.

RECOMMENDATIONS:

Move To Approve the Eastsound Land Supply Analysis Resolution And Affirm The Existing Eastsound Urban Growth Area Boundary.