

Adam Zack

From: Fred Klein <freddythek10@gmail.com>
Sent: Wednesday, June 19, 2019 3:41 PM
To: Comp Plan Update
Subject: Comment on Land Capacity Analysis of the Eastsound UGA

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

As I understand the methodology being used for the LCA for Eastsound, it will generate a significant capacity for additional residential development on parcels which are deemed to be “partially developed”, as well as parcels designated Village Commercial and Village Residential / Institutional upon which residential development is an allowable use.

Such a methodology...while resulting in theoretical numbers which can be used to demonstrate compliance with the GMA...must be carefully scrutinized to determine first, that requirements for future commercial development institutional needs in the Village core can be met, and second, that the additional development envisioned on those “partially developed” residential parcels will be realized, given the relevant market forces in play.

The question arises in both VC and Vi/R areas as to how capacity for future development will be allocated...there can certainly be NO DOUBLE (or TRIPLE) COUNTING...

Additionally, it must be acknowledged that most residential structures in VC and some in VR/I have been promptly converted into transient rentals; hence, nominally residential development in the Village should be discounted before including it as a contribution towards meeting the housing needs of full-time residents.

While theoretical numbers may be sufficient to meet certain GMA obligations, looking at the bigger picture thru the GMA lens requires that *REAL DEVELOPMENT OPPORTUNITIES* in the UGA be provided. That “bigger picture” includes San Juan County’s obligation to provide capacity within its UGAs to accommodate 50% of growth occurring within its constrained borders in order to protect it’s rural character.

For the past decade, it’s my understanding that County records show that two thirds of building permits for new homes have been issued for non-resident recreational second homes; that can be expressed as 200% of the growth necessary to accommodate local population growth. The vast majority of this development has occurred within the rural landscape.

The present 25% factor used to acknowledge non-resident growth does not begin to reflect this reality. While it may be optimistic to hope that by providing space in the UGAs for 50% of projected growth that that growth will occur, but it certainly will not unless the UGA has the capacity to accommodate it. Recall that SJC committed to provide that capacity in its UGAs in order to achieve compliance with the GMA after local Petitioners challenged the County before the WWGMHB.

Without *REAL DEVELOPMENT OPPORTUNITIES* in the UGAs, as differentiated from theoretical capacity embedded in existing small parcels which are already partially developed, I make the assertion that it will not be possible to prevent the suburbanization of the rural

landscape which will, in turn, destroy the illusions which draw people to the islands, illusions which are the root of the excellent property values we enjoy in San Juan County.

A methodology which seems to Hoover up every unused density unit(s) will certainly yield an unrealizable *capacity* that will simply encourage growth outside the UGA and discourage efforts to provide affordable housing...any merchant in town will verify that the lack of which has reached crisis proportions and is extremely detrimental to business interests during the summer season.

Within the boundaries of the existing Eastsound UGA are scant opportunities for the type of development which offers the possibility of attracting buyers who otherwise will be building in the rural landscape...certainly consideration should be given to enlarging the UGA, possibly to include the entire Eastsound Subarea...irrespective of the numbers generated by the currently proposed methodology.

An intelligent approach to dealing with future growth on Orcas, if not throughout San Juan County, would recognize the historic pattern of development...a pattern of nodes of settlement around the perimeter of a rural landscape...a pattern which is at the core of the Growth Management Act.

Respectfully submitted,

Fred Klein