

## Adam Zack

---

**From:** jmc779@rockisland.com  
**Sent:** Sunday, June 16, 2019 8:27 PM  
**To:** Comp Plan Update  
**Cc:** 'Paul Kamin EWUA'  
**Subject:** Land Capacity Analysis  
**Attachments:** LCA Letter to Council.docx

**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.

John M. Campbell, AIA  
P.O. Box 250  
Orcas, WA 98280  
(360) 376-2035  
jmc779@rockisland.com

June 16, 2019

San Juan County Council  
55 Second Street  
Friday Harbor, WA 98250

Dept. Of Community Development and Planning  
135 Rhone Street  
Friday Harbor, WA 98250

Subject: Friday Harbor Land Capacity Analysis

Ladies and Gentlemen.

Growth Management planning, i.e. preserving rural lands and concentrating growth in towns, seemed like a good idea at the time and, vs. not planning, it still does. The devil is in the details.

Discouraging sprawl, concentrating growth in towns and making adequate provision for affordable housing, however, is an economic non-sequitur. Concentrating growth makes land scarce and expensive. Fortunately, GM has produced a methodology that begins to assess the demand for and supply of developable land in our towns, Eastsound and Friday Harbor. San Juan County is applying that technology<sup>[1]</sup> (Draft Land Capacity Analysis Methodology) to Eastsound but, apparently, not in Friday Harbor. The reason given for this omission is that

***“San Juan County has no jurisdiction in the Town of Friday Harbor.”*** Under Growth Management, San Juan County clearly has both the responsibility and the authority to allocate population to the Town as well as to establish UGA boundaries. (Cotton v. Jefferson County 98-2-0017 and Petree v. Whatcom County 08-2-0021c and Wells v. Whatcom County 97-2-0030).

It is important because, in order to discourage sprawl, San Juan County has stipulated that it will allocate 50% of growth to UGA’s. Yet the Friday Harbor Population and Land Supply Report has its own methodology which fails to acknowledge that:

County Ordinance 16-2009 allocates 50% of San Juan Island population to the Friday Harbor UGA or,

The non-resident, recreational home growth in this county has exceeded 200% of resident population home growth for the past decade and must be accounted for as well. <sup>[2]</sup>

In short, San Juan County must analyze the Friday Harbor UGA Land Capacity with the same methodology as they use for Eastsound if the County expects to be compliant with GMA with respect to

- Encouraging growth in UGA;s
- Discouraging sprawl, and
- Making adequate provision for affordable housing.

John M. Campbell  
PO Box 250  
Orcas, WA 98280  
360-376-2035

---

<sup>[1]</sup> [www.sanjuanco.com/ComprehensivePlan/draft](http://www.sanjuanco.com/ComprehensivePlan/draft) land capacity analysis methodology

<sup>[2]</sup> CP Housing Needs Assessment 2017, pg. 1, line 11,

John M. Campbell, AIA  
P.O. Box 250  
Orcas, WA 98280  
(360) 376-2035  
jmc779@rockisland.com

June 16, 2019

San Juan County Council  
55 Second Street  
Friday Harbor, WA 98250

Dept. Of Community Development and Planning  
135 Rhone Street  
Friday Harbor, WA 98250

Subject: Friday Harbor Land Capacity Analysis

Ladies and Gentlemen.

Growth Management planning, i.e. preserving rural lands and concentrating growth in towns, seemed like a good idea at the time and, vs. not planning, it still does. The devil is in the details.

Discouraging sprawl, concentrating growth in towns and making adequate provision for affordable housing, however, is an economic non-sequitur. Concentrating growth makes land scarce and expensive. Fortunately, GM has produced a methodology that begins to assess the demand for and supply of developable land in our towns, Eastsound and Friday Harbor. San Juan County is applying that technology<sup>1</sup> (Draft Land Capacity Analysis Methodology) to Eastsound but, apparently, not in Friday Harbor. The reason given for this omission is that ***“San Juan County has no jurisdiction in the Town of Friday Harbor.”*** Under Growth Management, San Juan County clearly has both the responsibility and the authority to allocate population to the Town as well as to

---

<sup>1</sup> [www.sanjuanco.com/ComprehensivePlan/draft](http://www.sanjuanco.com/ComprehensivePlan/draft) land capacity analysis methodology

establish UGA boundaries. (Cotton v. Jefferson County 98-2-0017 and Petree v. Whatcom County 08-2-0021c and Wells v. Whatcom County 97-2-0030).

It is important because, in order to discourage sprawl, San Juan County has stipulated that it will allocate 50% of growth to UGA's. Yet the Friday Harbor Population and Land Supply Report has its own methodology which fails to acknowledge that:

County Ordinance 16-2009 allocates 50% of San Juan Island population to the Friday Harbor UGA or,

The non-resident, recreational home growth in this county has exceeded 200% of resident population home growth for the past decade and must be accounted for as well. <sup>2</sup>

In short, San Juan County must analyze the Friday Harbor UGA Land Capacity with the same methodology as they use for Eastsound if the County expects to be compliant with GMA with respect to

- Encouraging growth in UGA;s
- Discouraging sprawl, and
- Making adequate provision for affordable housing.

John M. Campbell  
PO Box 250  
Orcas, WA 98280  
360-376-2035

---

<sup>2</sup> CP Housing Needs Assessment 2017, pg. 1, line 11,