



SAN JUAN COUNTY DEPARTMENT OF COMMUNITY DEVELOPMENT

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STAFF REPORT

REPORT DATE: August 1, 2019
TO: San Juan County Planning Commission
CC: Erika Shook, AICP, Department of Community Development (DCD) Director
FROM: Adam Zack, Planner III 
SUBJECT: Comments on the Draft Gross Developable Lands Inventory (GDLI)
BRIEFING: August 16, 2019
ATTACHMENTS: A. Public Comments
B. Draft GDLI Parcels with Comments
C. Draft GDLI Parcels with EPRC Comments
D. General Comments with Staff Response
E. Memo to Eastsound Planning and Review Committee (EPRC) dated July 5, 2019 19
F. May 23, 2019, Draft Land Capacity Analysis Methodology
G. List of Assessor's codes

PURPOSE: To discuss the public comments received on the draft GDLI, and obtain a recommendation from the Planning Commission regarding possible changes to the May 23, 2019, Draft Land Capacity Analysis Methodology (LCA Methodology) related to three key issues:

- How to treat single-family residences (SFR) located in commercial and industrial areas.
- The treatment of conservation easements; and
- Whether parking lots should be considered re-developable.

BACKGROUND: A Land Capacity Analysis (LCA) is a forecast of what housing and commercial/industrial development may be possible given existing development and current regulations. It will be used to inform the Comprehensive Plan update. The LCA process and steps are established by the draft LCA Methodology attached to the June 5, 2019, staff report (<https://www.sanjuanco.com/DocumentCenter/View/18555>). Final capacity will be expressed in potential dwelling units and possible commercial/industrial building square footage.

The first step of the Land Capacity Analysis is preparing the draft Gross Developable Lands Inventory (GDLI). The GDLI maps parcels that may be re-developable or fully developed based on existing development and current development regulations. The draft GDLI was available for public comment June 5 through June 28, 2019 (June 5, 2019 staff report). The report was distributed for review to the County Council, Planning Commission, and the three planning and review committees: Deer Harbor, Eastsound, and Lopez Village. The County Council was briefed on the draft GDLI twice, June 17 in Friday Harbor, and June 18 on Orcas. The

Planning Commission was briefed on the draft GDLI at their meeting June 21, 2019. Staff provided additional information to the Eastsound Planning and Review Committee (EPRC) at their meeting on July 9, 2019.

PUBLIC COMMENTS RECEIVED BY JULY 8, 2019: The following table provides links to twenty comments received about the draft GDLI (Attachment B). Attachments B – E of this memo summarize those comments and proposed staff corrections and responses.

Table 1. Draft Gross Developable Land Inventory: Public Comments Received by July 8, 2019.

Comment Number	Date	Name	Link To Comment
1	June 6, 2019	Land Bank Director, Lincoln Bormann	https://www.sanjuanco.com/DocumentCenter/View/18794
2	June 11, 2019	John Campbell	https://www.sanjuanco.com/DocumentCenter/View/18653
3	June 16, 2019	John Campbell	https://www.sanjuanco.com/DocumentCenter/View/18654
4	June 16, 2019	Fred Klein	https://www.sanjuanco.com/DocumentCenter/View/18647
5	June 17, 2019	Lisa Byers	https://www.sanjuanco.com/DocumentCenter/View/18648
6	June 17, 2019	Daniel Gottlieb	https://www.sanjuanco.com/DocumentCenter/View/18649
7	June 18, 2019	Sally Reeve	https://www.sanjuanco.com/DocumentCenter/View/18650
8	June 19, 2019	Town of Friday Harbor, Land Use Administrator, Mike Bertrand	https://www.sanjuanco.com/DocumentCenter/View/18796
9	June 19, 2019	John Campbell	https://www.sanjuanco.com/DocumentCenter/View/18797
10	June 19, 2019	Fred Klein	https://www.sanjuanco.com/DocumentCenter/View/18651
11	June 19, 2019	Fred Klein	https://www.sanjuanco.com/DocumentCenter/View/18798
12	June 19, 2019	John Warsen	https://www.sanjuanco.com/DocumentCenter/View/18652
13	June 27, 2019	Annette Bader and Mike Hayworth	https://www.sanjuanco.com/DocumentCenter/View/18695
14	June 28, 2019	Timothy Dwyer	https://www.sanjuanco.com/DocumentCenter/View/18696
15	June 28, 2019	JoAn Mann	https://www.sanjuanco.com/DocumentCenter/View/18697
16	June 28, 2019	Kevin Walstrom	https://www.sanjuanco.com/DocumentCenter/View/18698
17	July 1, 2019	EPRC Chair, Paul Kamin	https://www.sanjuanco.com/DocumentCenter/View/18699
18	July 1, 2019	EPRC Chair, Paul Kamin	https://www.sanjuanco.com/DocumentCenter/View/18700
19	July 8, 2019	Evelyn Fuchser	https://www.sanjuanco.com/DocumentCenter/View/18800
20	July 8, 2019	Evelyn Fuchser	https://www.sanjuanco.com/DocumentCenter/View/18801

STAFF RESPONSE TO PUBLIC COMMENTS ABOUT EASTSOUND RURAL RESIDENTIAL (ERR): Several commenters pointed out that some fully developed parcels near the Eastsound UGA were incorrectly categorized. Staff found that the script was not correctly calculating the density in the ERR land use designation. In the data, ERR density was not a numeric value, it was letters, and the script did not translate it correctly. Staff changed the script to correctly interpret the density value for the ERR designation. The next draft of the GDLI will correctly categorize properties in this area.

PARCEL-SPECIFIC COMMENTS: The majority of the public comments received were specific comments about twenty-seven individual parcels. A staff summary and response to these comments is provided in Attachment B. Staff reviewed each parcel-specific comment and determined whether a change to the draft GDLI map was needed (Attachment B and C). Most of these changes were needed because the parcel data was incomplete in situation-specific circumstances such as condominium development, where the building value is not tied to the underlying parcel.

The EPRC also-commented on numerous parcels within the Eastsound UGA. The staff response to the EPRC parcel-specific comments is included in Attachment C. The EPRC is a volunteer advisory committee serving the Eastsound Urban Growth Area (UGA). Their volunteers took the time to review all the parcels within the UGA and provide comments. Their review spanned several multi-hour work sessions in June 2019. Staff recognizes and appreciates the amount of work that went into their comments. Several of the issues discussed in this report were specifically raised in their comments. Overall, the LCA has been enriched by the thoughtful and constructive participation of the EPRC.

GENERAL COMMENTS: Comments about the process and approach to the draft GDLI or LCA Methodology are summarized with staff responses in Attachment D.

EPRC QUESTIONS: A July 1, 2019, email from EPRC Chair, Paul Kamin, included eleven questions about the draft LCA methodology and GDLI. A July 5, 2019, staff memo answered those questions (Attachment E). On July 9, 2019, staff met with the EPRC to discuss the draft LCA Methodology/GDLI maps and answer questions.

KEY COMMENT ISSUES: Three key issues about conservation easements, parking lots, and single-family residences (SFR) in commercial, industrial and mixed-used designation were raised that warrant Council discussion and direction. These issues are not definitively addressed in the draft LCA Methodology. Decisions on whether and how to refine the draft LCA Methodology are needed before the remaining steps of the LCA are calculated.

When refining the LCA Methodology, it is good to keep in mind that the LCA is not intended to be a precise statement of what can happen parcel by parcel. Rather, it is designed to provide a high-level picture of what might be possible given existing development and current regulations. A land capacity analysis is used for general planning purposes and not every detail of every parcel can be accounted for in a general analysis.

Conservation Easements

The draft LCA Methodology addresses conservation easements by using Assessor's land use codes to reflect some types of easements (May 23, 2019, Draft LCA Methodology, Table 1. LCA Categories: Thresholds and Assumptions (Table 1) pg. 10). It uses the use codes to categorize public, utility, and conservation parcels. This list does not include every Assessor's use code associated with conservation easements. It includes use codes for Open Space, Timber and Ag lands with easements. In the May 23, 2019 Draft LCA Methodology, the Assessor's code for designated Forest Land was removed from the list because development is not limited on parcels in this tax classification. There are approximately ten additional Assessor codes that reflect some type of conservation easement on a parcel (Attachment G). For example, Assessor Code 1120: Single Family residence with a conservation easement.

Sally Reeve raised an issue regarding categorization of parcels with conservation easements (Attachment A, comment 7). She noted that the easements on several parcels have particular requirements, unique to each parcel. These per-parcel agreements and restrictions may only limit where or what kind of development is allowed but do not expressly prohibit all development. She noted that one vacant parcel with a conservation easement could have residential development under the easement terms. Thus, using Assessor's use codes related to conservation easements may subtract developable land from the GDLI.

Conservation easements present a unique problem when calculating land capacity. Assessor's use codes do not indicate how development is limited by an easement because each easement is parcel-specific. This parcel-specific level of detail make it difficult to generalize at the level required for the LCA.

Staff Recommendation

Option B, remove all Assessor's use codes that refer to easements used to categorize public, utility, and conservation lands from the draft LCA Methodology Table 1 is recommended. The LCA is an effort to calculate how much development is possible given current regulations and existing development. Even though a conservation easement might limit development, categorization using them is difficult because not all easements prohibit development. Staff believes that Option B below will remove the uncertainty of using selected Assessor's codes for parcels with conservation easements. The LCA will be more consistent if conservation easements are not used to categorize public, utility, and conservation lands.

Option B removes the incomplete list of Assessor's codes for conservation easements in Table 1, shown in Figure 1 below, to resolve this issue. This option would result in additional capacity because more parcels would be categorized as vacant or re-developable using as different thresholds are applied such as land value. Option B would not exclude developable parcels with easements from the GDLI.

Easement Option A. Expand the list of Assessor's use codes in Table 1 to include additional Assessor's codes for parcels with conservation easements. Expanding this list would probably increase the amount of parcels categorized as fully developed public, utility, and conservation lands. In addition, it would reduce the land categorized as vacant or re-developable and result in more cases of parcel categorized as fully developed but that have some amount of development capacity such as the properties Ms. Reeve identified. On the other hand, expanding the list would avoid counting some parcels as developable that are limited by easements. The net result would be that more land is categorized as fully developed and less land categorized as re-developable or vacant. This will reduce the land considered developable when calculating final capacity.

Easement Option B. Remove Assessor's use codes that refer to easements used to categorize public, utility, and conservation lands from the draft LCA Methodology Table 1.

Figure 1 shows the criteria from the draft LCA Methodology. Option B would remove four codes, 9420, 9423, 9520, and 8120. Removing these use codes from definition column shown in Figure 1 would mean that parcels with these use codes would be categorized using other LCA Methodology criteria. For example, a parcel with the Assessor's use code 9420 (Open Space with Conservation Easement) would be categorized based on other data such as value and not its use code.

Figure 2 shows the sixty-five parcels in the County that are currently assigned one of the four Assessor's use codes proposed to be removed from the draft LCA Methodology. These parcels were categorized as fully developed public, utility, and conservation lands. Overall, this would affect approximately 1,900 acres, a small portion of the total land in the County. Some of these parcels may likely be categorized as fully developed public, utility and conservation when other criteria in the LCA Methodology is applied.

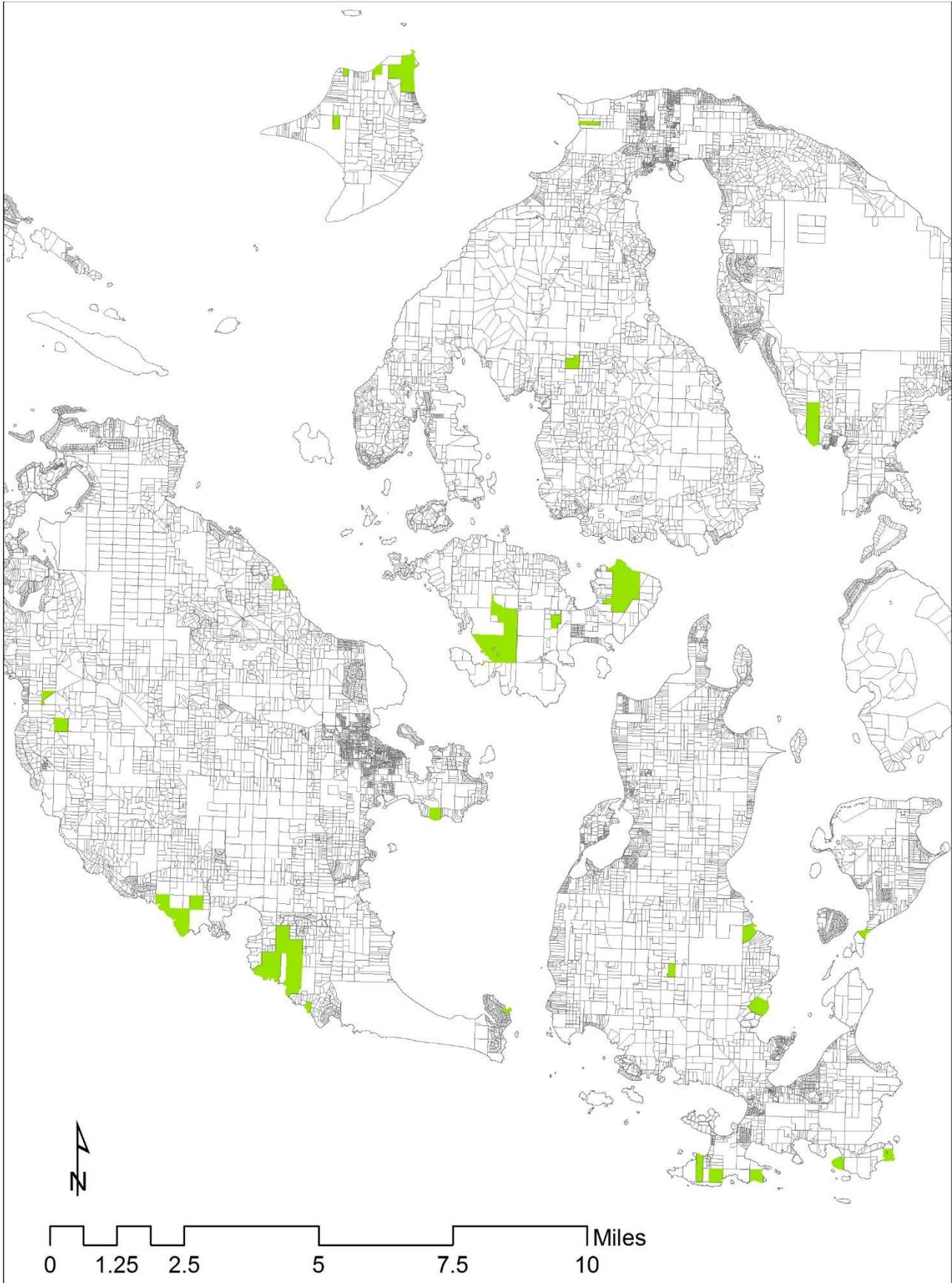
Option B would probably result in more parcels being categorized as re-developable or vacant. The limits conservation easements place on development potential will not be reflected in the resulting capacity calculations. The inventory of developable land would likely be increased; ultimately increasing final land capacity.

Figure 1. Assessor's Land Use Codes in the Draft LCA Methodology¹

	LCA CATEGORY	DEFINITION	THRESHOLDS /ASSUMPTIONS
C.	<p>Public, Utility & Conservation (No further development potential)</p> <p><u>GIS Data Category 0</u> <u>GIS data type: P</u></p>	<p><u>Assessors Land Use Codes:</u> 7600: Parks 4800-4820: Utilities 6800-6820: Educational services 6700-6703: Governmental services 9240 9420: Open space with conservation easement 9243 9423: Open Space with conservation easement and dock 9520: Current Use Timber land with a conservation easement 8120: Agriculture with Conservation Easement 4500: Highway right-of-way 7400-7420: Recreational activities 8800-8820: Designated forest land 9900-9920 – <u>Platted Common Area or Access</u></p> <p><u>Land Use Designations</u> <u>Natural (N)</u> <u>Eastsound Natural (EN)</u> <u>Olga Community Center (OCC)</u> <u>Hamlet Park (HP)</u></p>	<p>Parcels are considered fully developed public, utility and conservation lands if the following criteria apply:</p> <p>a. Properties with land uses listed by the Assessor's codes as Public, Utility and Conservation; <u>or</u></p> <p>b. The parcel is on the GIS layers of public lands and County Parks and Open Space; <u>or</u></p> <p>c. <u>Existing public, utility and conservation developments preclude future development (i.e. cemeteries, public water system properties)</u></p>

¹ From May 23, 2019, draft of the *Land Capacity Analysis Methodology*

Figure 2. San Juan County Parcels with Use Codes 9420, 9423, 9520, and 8120.



Easement Option C. Do not change the Assessor's land use codes in the LCA Methodology. This option resulted in some parcels with easements being considered fully developed and others being categorized as vacant or re-developable. It has an ambiguous effect on the capacity calculations because we do not know precisely how development on these parcels is limited by the easements. Furthermore, the list of Assessor's land use codes on page 10 of the LCA Methodology shown in Figure 1 above does not include every use code associated with conservation easements. The incomplete list included in the draft LCA Methodology

Parking Lots

Table 1 from the draft LCA Methodology does not address parking lots in the thresholds and assumptions. As a result, parcels with parking lots in commercial, industrial, and mixed-use designations are considered re-developable if the building to land value ratio is less than or equal to one; just like any other structure. If the land is more valuable than the structures on it, that parcel is considered re-developable.

The Eastsound Planning and Review Committee raised an issue regarding the categorization of parking lots (Attachment A, comments 17 and 18). They suggested that parcels entirely covered by parking lots should be categorized as fully developed because the lot's existence is tied to the structure or use it serves. The EPRC thought that parcels with parking lots identified as re-developable on the draft GDLI map do not actually have additional development potential. They were concerned that without a change to the methodology, the inventory of re-developable lands within the Eastsound UGA would be inflated.

The LCA is an attempt to quantify how much development is possible given current regulations and existing development. The Eastsound Subarea Plan includes specific regulations for off-street parking in San Juan County Code (SJCC) 18.30.630. This section of code allows options for providing off-site parking to serve uses and structures. This includes buying parking credits through the Eastsound parking fund (SJCC 18.30.640) or providing parking at an alternate location (SJCC 18.30.630 (A)(7)). Existing parking lots can be redeveloped under the current Eastsound regulations.

For example, the parking located on three parcels owned by Island Market (TPNs 271455104, 271455106, 271441005000, and 271441004) could possibly be re-developed. The parcels are shown in Figure 3; all four are under the same ownership. The existing parking could be relocated onto the undeveloped parts of one of those parcels or additional land could be acquired to relocate the parking and allow re-development of the parcels fronting on Prune Alley. This may be a challenging scenario but it is still possible. The LCA is about what could potentially be allowed.

Figure 3. TPNs 271455104, 271455106, 271441005000, and 271441004¹



¹2016 Aerial Photograph

Staff Recommendation

Option B do not change the draft LCA Methodology is recommended. Categorizing parking lots as fully developed might inappropriately reduce the number of parcels considered re-developable. Parcels with parking lots may be unlikely to re-develop because permitted development requires parking. Even though it is unlikely that a parcel with a use and parking lot will be redeveloped on the parking lot area. Such parcels should not be considered fully developed. Parking lots can ultimately be moved or re-developed just like any other structure.

Options

Parking Lot Option A. Categorize parking lots as fully developed. Using the list of parcels provided by the EPRC, staff could manually edit the parcels that include parking lots. Manual edits of these parcels would be required because there is not a single common data point that these parcels share that could be used to change the LCA script. Item B in Table 1, pg. 8 of the LCA Methodology could be clarified to specifically name parking lots as an existing development that precludes future additional development.

Parking Lot Option B. Do not categorize parking lots as fully developed. This option would not require a change to the current draft of the GDLI or the LCA Methodology.

SFR in Commercial Designations

John Campbell's concern is about how existing single family residences (SFR) in commercial, industrial, and mixed-use designations are categorized (Attachment B, Comment 9). His concern is that newer SFR in these designations are unlikely to be re-developed and that they should be categorized as fully developed. The criteria on page 12 of the LCA Methodology determines that SFRs in commercial and mixed-use areas should be categorized as "re-developable" based on the assumption that the lower-intensity SFR use of properties will eventually be re-developed with higher-intensity commercial, industrial, and mixed-use developments. The draft LCA Methodology categorization indicates that re-development is possible and that more intense uses than SFR are allowed by the land use designations.

Staff Recommendation

Option B below, do not change the draft LCA Methodology is recommended.

Categorizing SFRs in commercial, industrial, and mixed-use areas as re-developable is appropriate because the regulations allow for higher intensity development in these areas. The LCA is an effort to calculate how much development is possible given current regulations and existing development. Single-family residences in these areas have additional development potential under current regulations that should be included in the capacity calculations. Assuming that SFRs in these areas will not be re-developed will not accurately reflect the development potential allowed under the current regulations.

The LCA will eventually show how many dwelling units may be re-developed in commercial and industrial areas. This will help to inform the policy discussions and land use designation decisions the Council will make during the update of the Comprehensive Plan Land Use Element. If, for instance, the possibility of SFR being re-developed in the Service Light Industrial land use designation does not align with other policy aims in the Comprehensive Plan, the Council can use the LCA to inform their decisions about potential changes.

Options

SFR Option A. Change the assumptions in the draft LCA Methodology that SFRs in commercial, industrial, and mixed-use designations should be categorized as re-developable.

This option would require that items I and J of Table 1, page 12 of the LCA Methodology be changed to eliminate the assumption that SFRs in these designations are re-developable (the parcel is occupied by a SFR) Removing this assumption would reduce the overall capacity in commercial, industrial, and mixed-use designations. The assumption behind this option would be that SFR in these designations do not have any additional development potential.

SFR Option B. Do not change the SFR assumptions in commercial, industrial, and mixed-use areas. This option will continue to count SFR as re-developable in these designations.

NEXT STEPS: Staff will be updating the draft LCA Methodology and GDLI during August to address Council direction and public comments. Afterwards, the remaining LCA steps will be completed.

Staff is tentatively scheduled to brief the Planning Commission and County Council on the draft final land capacity results in September. Plenty of time will be allowed for public review of the draft final capacity documents. Staff will also present the draft final capacity it to EPRC and provide public presentations in Lopez Village and Eastsound.

ATTACHMENT A

Land Capacity Analysis Public Comments Received June 6 through July 8, 2019

Comment Number	Date	Name
1	June 6, 2019	San Juan County Land Bank Director, Lincoln Bormann
2	June 11, 2019	John Campbell
3	June 16, 2019	John Campbell
4	June 16, 2019	Fred Klein
5	June 17, 2019	Lisa Byers
6	June 17, 2019	Daniel Gottlieb
7	June 18, 2019	Sally Reeve
8	June 19, 2019	Town of Friday Harbor, Land Use Administrator, Mike Bertrand
9	June 19, 2019	John Campbell
10	June 19, 2019	Fred Klein
11	June 19, 2019	Fred Klein
12	June 19, 2019	John Warsen
13	June 27, 2019	Annette Bader and Mike Hayworth
14	June 28, 2019	Timothy Dwyer
15	June 28, 2019	JoAn Mann
16	June 28, 2019	Kevin Walstrom
17	July 1, 2019	EPRC Chair, Paul Kamin
18	July 1, 2019	EPRC Chair, Paul Kamin
19	July 8, 2019	Evelyn Fuchser
20	July 8, 2019	Evelyn Fuchser

Adam Zack

From: Adam Zack
Sent: Monday, June 10, 2019 11:13 AM
To: Lincoln Bormann
Subject: RE: GDLI initial comments

Hi Lincoln,

If you have a proposed change to the GDLI web map or May 23rd draft *Land Capacity Analysis* please send them to compplancomments@sanjuanco.com refer to the line and page number or parcel number for your preferred change. It would be quite valuable if you or the Land Bank have input on these documents.

The *Land Capacity Analysis Methodology* provides the criteria for determining what lands are fully-developed, vacant, etc. The criteria is shown in Table 1, starting on page 8 of that document (Attachment A of the [June 5, 2019 staff report](#)). Item B in Table 1 provides the use codes and building to land value ratio used to determine if a parcel is fully developed.

It is possible that these areas may be sold in the future, but it is assumed they will remain in their current use through the planning horizon (the next twenty years). This is one of the assumptions from the *Land Capacity Analysis Methodology*. The assumption is included in Table 1, page 9 of that document: including the use code 7500 in the definition and the thresholds and assumptions.

If you feel that this assumption is incorrect, please provide your comment on the May 23rd Draft *Land Capacity Analysis Methodology* to compplancomments@sanjuanco.com.

I hope that helps to clarify, let me know if you have any other questions.

Thanks,
Adam Zack
Planner III
Department of Community Development
San Juan County, WA
360-370-7580
adamz@sanjuanco.com

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From: Lincoln Bormann
Sent: Thursday, June 6, 2019 3:21 PM
To: Adam Zack ; Linda Ann Kuller
Subject: GDLI initial comments

Hi Adam and Linda,

I'm just getting into looking at the GDLI, but off the bat I'm seeing that the summer camp properties seem to have all development capacity removed. As far as I know, none of these properties is protected by conservation easement or covenant and thus could be sold for development (as has happened with many YMCA properties around the country).

Lincoln

Lincoln Bormann, Director
San Juan County Land Bank
350 Court St. No.6
Friday Harbor, WA 98250
360-378-4402



Adam Zack

From: Erika Shook
Sent: Wednesday, June 12, 2019 8:50 AM
To: Comp Plan Update
Subject: FW: Eatsound Village Core Gross Developable Land Inventory June 2019
Attachments: LCA Anomolies spread sheet.xlsx; ATT00001.htm

From: Rick Hughes <rickh@sanjuanco.com>
Sent: Tuesday, June 11, 2019 6:33 PM
To: Erika Shook <erikas@sanjuanco.com>; Mike Thomas <miket@sanjuanco.com>
Subject: Fwd: Eatsound Village Core Gross Developable Land Inventory June 2019

FYI

Rick Hughes
 San Juan County Council
 Orcas/Waldron Island
 District #2
Rickh@sanjuanco.com
 360-472-0253

Begin forwarded message:

From: <jmc779@rockisland.com>
Date: June 11, 2019 at 2:28:02 PM PDT
To: 'Paul Kamin EWUA' <pkamin@rockisland.com>, 'Brian Wiese' <brian_wiese@outlook.com>, 'Terry Gillespie' <terrywg57@gmail.com>, "'Leith Templin'" <leithtemplin@hotmail.com>, 'Kangaroo House B&B' <innkeeper@kangaroohouse.com>
Cc: 'rick hughes' <Rickh@sanjuanco.com>, 'joAn Mann' <jo.an.a.mann@gmail.com>
Subject: RE: Eatsound Village Core Gross Developable Land Inventory June 2019

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Paul, Good for you. I hope that I may be included because this really is important. I too have been working with the methodology and DO NOT understand it. Almost but not quite.

Attached is a list of a few anomalies. CD&P really does need your help.

Did you note that the Council is meeting and will discuss this June 18 at the Fire Hall all day on a full agenda?

.....jmc

From: Paul Kamin EWUA <pkamin@rockisland.com>
Sent: Tuesday, June 11, 2019 1:21 PM
To: Brian Wiese <brian_wiese@outlook.com>; Terry Gillespie <terrywg57@gmail.com>; Leith Templin <leithtemplin@hotmail.com>; Kangaroo House B&B <innkeeper@kangaroohouse.com>; John Campbell <jmc779@rockisland.com>
Cc: rick hughes <Rickh@sanjuanaco.com>; joAn Mann <jo.an.a.mann@gmail.com>
Subject: Eatsound Village Core Gross Developable Land Inventory June 2019

EPRC,

Attached is a copy of an effort I've made to "zoom in" on the latest land use analysis the county has published.

I spent so time this weekend reading through the June 5 staff report we were sent. I think I've now understand the methodology that has been used in creating these maps.

I'd like to actually go through the County's methodology and apply it to our new maps parcel by parcel to see how the county designates each parcel in town.

Is a parcel fully or partially developed? Is a parcel commercial or mixed use? Which parcels can be considered redevelopable, and which one aren't?

The answers to these questions will influence the future development capacity in our village. I think this needs careful scrutiny, and I think it is an EPRC job.

Unfortunately, the County has a June 28th deadline for public comment on the June 5 report, and maps created with this report.

I'd like to schedule a meeting to go through this. I'd like to create a work session that all of EPRC could attend. We can post meeting at the fire hall, and Sue Kollet at the county office will post the meeting on the county web site and combined this will meet our public meeting requirements.

I'd propose either Wed (6/19) or Thur 6/20) in the evening at the fire hall. Let me know if either of these work for you.

I know we are heading into busy season. Sorry to ask for more time. This is the Comp Plan info and window we've been waiting for.

In the Spirit of Service,

Paul Kamin
General Manager
Eatsound Water Users Association
360 376 2127
pkamin@rockisland.com

	A	B	C	D	E	F	G	H	I	K	L
1											
2	Land Capacity Analysis Anomalies										
3							exist			purported	
4	Parcel No.	Owner	Zone	Land \$	Bldg. \$	bldg/ land \$	Density units	allowable density	lot area acres	add'l capacity H*I-G	Note
5											
6	271113004	smugglers	R					u/a			OK not available, NAC
7	271131001	Port	SLI								Port, wetland, NAC
8	271142017	ESS&W dist	SLI								in use /Sewer plant, NAC
9	271143015		SLI								aircraft hangar condominium, NAC
10	271412003	Maria Dunning shop	VI/R								wetland reasonable use exception
11	271322001	Orcas Cemetery	R								cemetery, not available, NAC
12	271158003	Hanger condo	SLI								restricted to aircraft use, NAC
13	271158004	ditto									"
14	271158005	ditto									"
15	271155024	Bee house	R	101,000	225,000	2.26	1	4	0.75	2	Additional capacity???
16	271412011	OPAL	R				0	12	1.66	18.92	Wetland, no exception, NAC
17	271412012	OPAL LavenderHollow	R	282,580	109,250	0.39	20	12	3.32	19.84	12 unit Lavender Hollow, NAC
18	271461026	OPAL	R	\$1.00	\$0.00	0				0	OPAL office & units/ NAC
19	271233001	3BB+Train	ER	314,000	0	0	0	0.2	12.69	2.538	zoning is Eastsound RURAL @ 1 u./5 acres

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^[1] (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).

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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. ^[2]

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

^[1] www.sanjuanco.com/ComprehensivePlan/draft land capacity analysis methodology

^[2] 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.

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- Making adequate provision for affordable housing.

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

² CP Housing Needs Assessment 2017, pg. 1, line 11,

Adam Zack

From: Fred Klein <freddythek10@gmail.com>
Sent: Sunday, June 16, 2019 8:49 PM
To: jmc779@rockisland.com
Cc: Comp Plan Update; Paul Kamin EWUA
Subject: Re: Land Capacity Analysis

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.

Nice work John...brief, focused, clear, and directly on point.

I hope to read your insightful comments on the chosen process as applied to Eastsound, particularly a questioning as to whether or not it has the capacity for absorbing 50% of that “non-resident recreational development” which is rampant in the rural landscape.

Sent from my iPhone

On Jun 16, 2019, at 8:26 PM, <jmc779@rockisland.com> <jmc779@rockisland.com> wrote:

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

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<LCA Letter to Council.docx>

^[1] www.sanjuanco.com.ComprehensivePlan/draft land capacity analysis methodology

^[2] CP Housing Needs Assessment 2017, pg. 1, line 11,

Adam Zack

From: Lisa Byers <opalclt@opalclt.org>
Sent: Monday, June 17, 2019 10:23 AM
To: Comp Plan Update
Cc: Paul Kamin; Margaret Payne
Subject: Comments on land capacity analysis in Eastsound
Attachments: Land Capacity Analysis Comments from L.Byers.xlsx

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.

Hi -

I have reviewed the land capacity analysis on behalf of properties owned by (or adjacent to) land owned by OPAL Community Land Trust.

I offer the attached proposed changes to your analysis.

Thank you,

--

Lisa Byers
Executive Director
OPAL Community Land Trust
www.opalclt.org / 360-376-3191

*Housing Touches Everyone. Help **provide** rental housing on Orcas!*

Adam Zack

From: Dan Gottlieb <dan@salish360.com>
Sent: Monday, June 17, 2019 1:38 PM
To: Comp Plan Update
Subject: tpn information on your map

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.

Hi,

My three TPNs are configured differently than your map and your map does not show the permitted development on my property.

160850001000
160850002000 - reconfigured
160850003000 - now has a home and a separate building for my home-office.

A BLM was approved by the county last year changing my rectangle on 160850003000 into an "L" shape by taking part of 160850002000.

Also, I was informed at the time, last year, that 160850001000 is a buildable lot. Is this correct? I have no plans to develop it, but as a Real Estate Broker it is my business to understand.

Thank you--

Dan

--



Daniel Gottlieb
Managing Broker/Owner
Salish Real Estate
PO Box 114
Olga, WA 98279
www.salish360.com
dan@salish360.com
C: 360-941-8551

Adam Zack

From: Sally Reeve <Reeve@msn.com>
Sent: Tuesday, June 18, 2019 1:37 PM
To: Comp Plan Update
Subject: Comp Plan Comments

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.

Comments on GDLI web map and draft methodology

We are owners of tax parcels: 242443001000, 242434001000, 242444001000, 141934001000

Conservation Easements:

- The San Juan Preservation Trust holds conservation easements on all these parcels.
- Parcel 242434001000 does not show a conservation easement on the GDLI web map.
- The methodology used regarding conservation easements appears to assume if a parcel is subject to a conservation easement no additional development can occur on the parcel. Development potential on parcels with conservation easements is determined by the terms of the easement. The terms of a conservation easement may allow for additional development.
 - Parcel 242443001000 has a conservation easement on the entire parcel and is in open timber and open space. The conservation easement does allow for additional residential development on this parcel. The GDLI web map indicates fully developed which the parcel is not. The same applies for Parcel 141934001000.
 - What is the definition of use code 8320?
 - Placing any parcel that is in open space with a conservation easement into GIS category 0, GIS data type P is not an accurate assumption of further development on these parcels. Future development would be determined by the terms of each conservation easement. Some conservation easements may preclude future development. Other conservation easements may allow additional development.

Combination of parcels on GDLI web map:

- A couple of years ago the assessor's office started combining two government lots into one tax parcel. This has made it difficult to understand the tax assessment as one government lot has a conservation easement with open timber and open space. The other government lot has a conservation easement, a residential structure associated with the farm but acreage assessed at residential rate, open agriculture and open space. The conservation easement allows for additional development on both government lots.
- The GDLI web map, in using the combination of the government lots and uses, assigned tax parcel 242444001000 to 1 R, partially used and residential. Why is this designated residential when parcels 242443001000 and 141934001000 are classified as 0 P?

Appropriate designations:

- 242443001000 – conservation easement, open space, open timber, 3R
- 242434001000 – conservation easement, open timber, 3R
- 242444001000 – conservation easement, open space, open timber, open agriculture, residential, 1R
- 141934001000 – conservation easement, open space, open timber, residential, 1R

Flint Beach Ohana LLC, Tom + Sally Reeve, dated 6/18/19

Adam Zack

From: Mike Bertrand <mikeb@fridayharbor.org>
Sent: Wednesday, June 19, 2019 11:42 AM
To: Adam Zack
Cc: Linda Ann Kuller; Carol Holman
Subject: RE: County Land Capacity Analysis

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.

Hi Adam,

Land capacity in the Town of Friday Harbor, mostly is driven by utility access and capacity of our infrastructure. That information is in the associated master plans of water and sewer primarily. Those documents are online on our website <http://www.fridayharbor.org/2174/Water-System-Conservation-Plans> . I believe that our sewer master plan is being updated currently so generally we go by water capacity for any analysis that we do. As far as the County's allocation to our UGA, there are only about 10 lots in the unincorporated UGA of Friday Harbor so I'm not sure how you handle your required allocation on San Juan Island. For our residential capacity we analysis Single Family at 4 units per acre and Multi Family at 14 units per acre. We compute the acreage of each and do the calculations. Hope this helps.

Mike Bertrand
 Land Use Administrator
 Town of Friday Harbor

From: Adam Zack <adamz@sanjuanco.com>
Sent: Monday, June 17, 2019 5:21 PM
To: Mike Bertrand <mikeb@fridayharbor.org>
Cc: Linda Ann Kuller <lindak@sanjuanco.com>
Subject: County Land Capacity Analysis

Hi Mike,

As you may know, the County is working on the Land Capacity Analysis for our Comprehensive Plan Update. We recently released the first step for public comment.

One of the public comments (included below) stated:

“... 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 ...”

Does this report exist and if so, can you tell me where I can find it? It would be helpful to have for our reference moving forward with the Comprehensive Plan Update.

If you want to see some more information on the County's Land Capacity Analysis, our progress so far is included in a June 5 staff report here: <https://www.sanjuanco.com/DocumentCenter/View/18555> Yours and the Town's comments on the Land Capacity Analysis would be most welcome.

Adam Zack
 Planner III
 Department of Community Development
 San Juan County, WA
 360-370-7580

adamz@sanjuanco.com

NOTICE: All emails, and attachments, sent to and from San Juan County are public records and may be subject to disclosure pursuant to the Public Records Act, Chapter 42.56 RCW.

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

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^[1] www.sanjuanco.com/ComprehensivePlan/draft land capacity analysis methodology

^[2] CP Housing Needs Assessment 2017, pg. 1, line 11,

Adam Zack

From: John Campbell <campbell779@outlook.com>
Sent: Wednesday, June 19, 2019 7:53 PM
To: Adam Zack
Cc: Paul Kamin EWUA; Fred Klein; Brian Wiese
Subject: Land Capacity Analysis

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.

Adam, I have a question about how the various residential uses in the Eastsound VC district on Rose/Pine Street will be evaluated. Examples are

AP# 271453106 and 271453306 both new residential structures, both categorized 4/MU. This is Mixed Use/ re-developable.

They are certainly developed well below residential capacity but brand new structures.

Is the assumption that these parcels will be redeveloped with commercial uses? There is no precedent that I know of in Eastsound for replacing sound new homes with commercial buildings for many years. Historically but not the last few decades.

A related question is, if these buildings are assumed to become commercial, is the existing residential capacity added to the local residential demand or does it simply fall thru the cracks as was usual in Urban Renewal? There are some doggy old trailers in this neighborhood that will almost certainly be replaced with something soon but what is very uncertain. If it is simply a new trailer, there is no additional capacity at all.

In my judgement, these are clearly 0/MU, fully developed Mixed Use. I suggest the criteria be changed in this zone so that if the improvement value is greater than the land value the property is classified Category 0.

Could that work??

John Campbell
376-2035

Ap3

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

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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

Adam Zack

From: Fred Klein <freddythek10@gmail.com>
Sent: Wednesday, June 19, 2019 8:21 PM
To: John Campbell
Cc: Adam Zack; Paul Kamin EWUA; Brian Wiese
Subject: Re: Land Capacity Analysis

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.

Excellent suggestion John...and it carries with it a much better chance of having an impact on the LCA than my meanderings.

Sent from my iPhone

On Jun 19, 2019, at 7:53 PM, John Campbell <campbell779@outlook.com> wrote:

Adam, I have a question about how the various residential uses in the Eastsound VC district on Rose/Pine Street will be evaluated. Examples are AP# 271453106 and 271453306 both new residential structures, both categorized 4/MU. This is Mixed Use/ re-developable.

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Could that work??

John Campbell
376-2035

Ap3

Adam Zack

From: Lopez Farm Cottages <lopezfarmcottages@gmail.com>
Sent: Wednesday, June 19, 2019 5:16 PM
To: Adam Zack
Cc: John Warsen; Cathie Mehler
Subject: Gross Developable Lands Inventory / Lopez Farm Cottages & Tent Camping
Attachments: LFC Designation San Juan County Code.pdf

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.

Hi Adam,
Thanks for your time to speak with us on the phone this afternoon.

Per our conversation we want to document that the UDC has designated both our parcels **18.40.410 Small Resorts and camps, existing**. . The tax parcel numbers are 25 113 1004 and 1005. Our address is 607 Fisherman Bay Road.

We would appreciate it if you would send us the link to get on the mailing list.

Thank you for keeping us informed.
Regards,
John Warsen

Adam Zack

From: Michael Hayworth <mikehayworth@gmail.com>
Sent: Thursday, June 27, 2019 3:23 PM
To: Comp Plan Update
Subject: ~ Land Capacity correction ~

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.

Hello,

We are submitting the following corrections:

Parcel Number	Assigned Category	Proposed Category	Explanation
271350014000	1	0	The density here is ERR2; it is fully developed
271350015000	3	2	The density here is ERR2; it is vacant and not sub-dividable.

Thank you,

Annette Bader and Mike Hayworth

Hayworth Design & Construction

PO Box 133 / 114 Colgan Creek Rd.
Eastsound, WA 98245

360-376-4550 Office
360-378-7447 Mobile

mikehayworth@gmail.com

www.hayworthdesign.com

Adam Zack

From: Timothy Dwyer <tdwyer00@gmail.com>
Sent: Friday, June 28, 2019 10:59 PM
To: Comp Plan Update
Subject: proposed correction to land designation

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.

To whom it may concern:

I am writing to suggest a correction to land designation category listed on the May 23, 2019 version of the GDLI map for San Juan Island.

Parcel in question: 361943002000

Current designation and type: R, RFF

Proposed correction: CI, 0

Justification: This parcel contains an industrial and commercial reuse and recycling operation that is unique on San Juan Island. For over a decade, "Community Treasures" has provided an outlet for the exchange of used goods that would otherwise enter the waste stream. For a nominal restocking fee, many types of items are put within financial reach of lower income families on the island, raising their standard of living. Furthermore, this facility consolidates materials for home repair/renovation as well as for materials used in classrooms with limited budgets. On an island characterized by a high cost of living as well as few options for limiting solid waste, this facility provides the most viable solution. For these reasons, I recommend changing the Land Capacity Analysis Gross Developable Land Inventory Type from the current "Residential" designation to "Commercial and Industrial" so that this parcel can be brought into compliance.

Sincerely,
Timothy Dwyer
Friday Harbor

Adam Zack

From: joAn Mann <jo.an.a.mann@gmail.com>
Sent: Friday, June 28, 2019 6:57 PM
To: Comp Plan Update
Subject: Procedural Comments for LCA

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.

Dear Adam and team,

My comments address procedural issues, not the spread-sheet request on review of parcels, which was clearly stated in publications from earlier in June. These areas are:

- (1) Clarifying the Public Process time-frame and communicating to Orcas Residents to become informed appropriately to better facilitate the LCA process;
- (2) Interactive Map difficulties for the lay person trying to review parcels through the current link and possible alternate;
- (3) Alternate inter-departmental option for public input and
- (4) Inclusion of the 2018 adopted Vision elements informing this and other Comp Plan processes at the front end, not an add-on in the later policy setting stages when Vision becomes 'retrospect', not truly visionary.

(1) Public Process Timeframe

I understand the comment period for the LCA verification has been 'unofficially' extended at least until some time-frame post the EPRC next meeting from the original opening and Request for Comment June 6, 2019. This meeting is July 9, 2019, with the agenda focusing now on this area for public comment, with both you and Erica Shook being there to clarify and reply to questions. Thank you for this informal extension of the public comment.

I would respectfully request:

- (a) updating the website, formal notices going out to all on the SJC wider area email interested parties both clarifying the date for public comment, which I understand is significantly longer, given the extent of the project *and*
- (b) encouraging public attendance at this EPRC "workshop" that is really useful and necessary background for Orcas residents to understand this very complex, technical approach for those without advanced computer skills; also
- (c) an added public process workshop this summer (July?) based on my experience of going through parcel by parcel, like the EPRC review. This team has volunteered hours of clerical and informed help in verifying the parcel designations in that area of Orcas. Perhaps similar team/s via two or three different timeframe 2 hour windows at the Senior Center as a public outreach for these important (and not necessarily computer skilled) stakeholders, using a traditional personal "high touch" workshop to engage, promote this important project...? Spreading the word through this approach (plus cookies :) could go a long way to better community relations with SJC.

(2) Interactive Map suggestion

I found the current map linked to this project is difficult to read. I am fairly computer savvy, however, working with the color layers hides the actual on-the-ground information and then is more confusing than helpful. I was guided by an EPRC member to the Polaris version that can be accessed through another avenue that is also

associated with the LCA. That map was much easier to use! Please change the public comment link to the Polaris version. Thank you!

From my experiences in multi-generational users of maps (from paper to Polaris), retaining low-tech and straightforward options in this process for public inclusion could simplify, accommodate, add greater the PR-value *and* engagement with the public that can help accomplish this monumental and significant validation of the sophisticated program you have designed. There is *no* doubt of the value of the program being developed... but rather the validation process being practical, non-threatening and accessible to the stakeholders who need to verify data. It may sound "archaic" to include a paper and pencil comment form, but with the number of seniors that own parcels both in the UGB area, and the rural areas, is signification. It might prove useful to add that methodology back to the traditional mix of computer generated development.

(3) Alternate inter-departmental option for public input

Because not all impacted residents (full *or* part-time) of Orcas are computer savvy with GIS interactive skills. Is it possible to include the Assessors Office mailings to *all* tax parcels on Orcas (and Lopez?) with a simple, lay-person explanation of what to do *in writing* that does not pre-suppose even a small degree of computer fluency in mapping and planning? If this process is ongoing, a simple note attached to a currently scheduled Assessors Office mailing wouldn't add much --if anything-- to the cost. And, the information distributed and received by these key stakeholders of SJC could reinforce a straightforward, low-tech public process that has been effective for decades. It would also be nice to know, from a tax-payer perspective, that the SJC departments are not silos, but rather work together for efficient use of their (our!) tax dollars paid in.

(4) Vision informing the Plan update at the front end of the process

The adopted 2018 Vision Statement Update went through an extensive public, Commissioner and staff process. Organizing high-need projects in Planning by the elements of this Vision is fundamental to manifesting the SJC Comp Plan's update effectively, simply, practically. This supports the policy and goals process, so it wouldn't be silo'ed out as what appears to be considered a "requirement" rather than the Vision established by the key stakeholders of SJC.

If a front end process to consider *which* Vision elements and *how* are being served that the Comp Plan Elements impact, Stakeholders could more strategically understand the value of the Comp Plan projects. Without that connection, projects are often viewed by the public and especially tax-paying, working stakeholders as disjointed and necessity is likely to be questioned. This is not the current SJC process, but I would respectfully request that be considered. It is very useful from my experiences in other states and counties.

Thank you very much for your hard work, willingness to be open to suggestions that you have displayed and efforts on behalf of SJC's future being one of abundance and continuing to be a most remarkable and inspiring community.

With my best wishes for this Comp Plan project!

JoAn Mann
PO Box 162
Orcas, WA 98280

Adam Zack

From: Kevin Walstrom <ktwalstrom@gmail.com>
Sent: Friday, June 28, 2019 5:26 PM
To: Comp Plan Update
Subject: 814 Olga Rd.

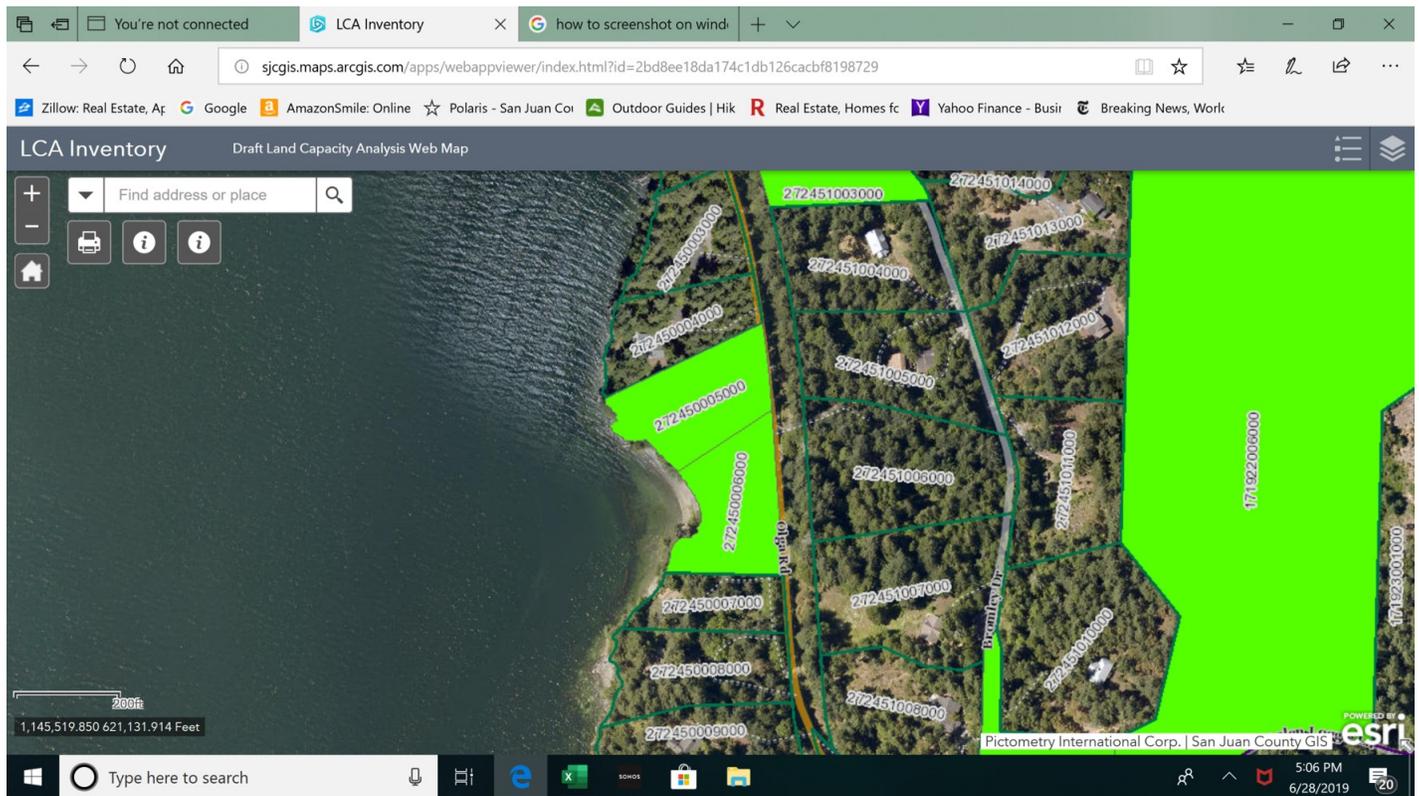
CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

I just read the article about your survey in the newspaper and wanted to send a note regarding parcel 272450005000, with the address of 814 Olga Rd. There is currently a qualifying SFR structure on the property. It's small and rustic but has been used since 1962 Please let me know if you have any questions.

Thanks,

Kevin Walstrom



From: Julie Thompson <JulieT@sanjuanco.com>
Subject: RE: Shoreline Questions... again
Date: October 16, 2017 at 8:34:46 AM PDT
To: 'Cory H' <charrington154@gmail.com>

Cory,

The replacement of nonconforming used to apply to residences only, but the new wording just talks about structures. The information you attached would qualify as the main residence as it appears to be the only structure on

the property. That would likely qualify as your footprint. I think an RPA could confirm that. And yes, you can demo the existing and start over.

Julie

Adam Zack

From: Erika Shook
Sent: Monday, July 1, 2019 8:56 AM
To: Comp Plan Update
Subject: FW: EPRC Land Capacity Analysis COMMENTS.xlsx
Attachments: EPRC Land Capacity Analysis COMMENTS.xlsx

From: Paul Kamin EWUA <pkamin@rockisland.com>
Sent: Friday, June 28, 2019 4:46 PM
To: Erika Shook <erikas@sanjuanco.com>
Subject: EPRC Land Capacity Analysis COMMENTS.xlsx

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.

Erika,

Attached is the latest version of EPRC's LCA comments for Eastsound. We have had 2 work group meetings, and are having our 3rd tonight.

Looking forward to the conversations to follow.

In the Spirit of Service,

Paul Kamin
General Manager
Eastsound Water Users Association
360 376 2127
pkamin@rockisland.com

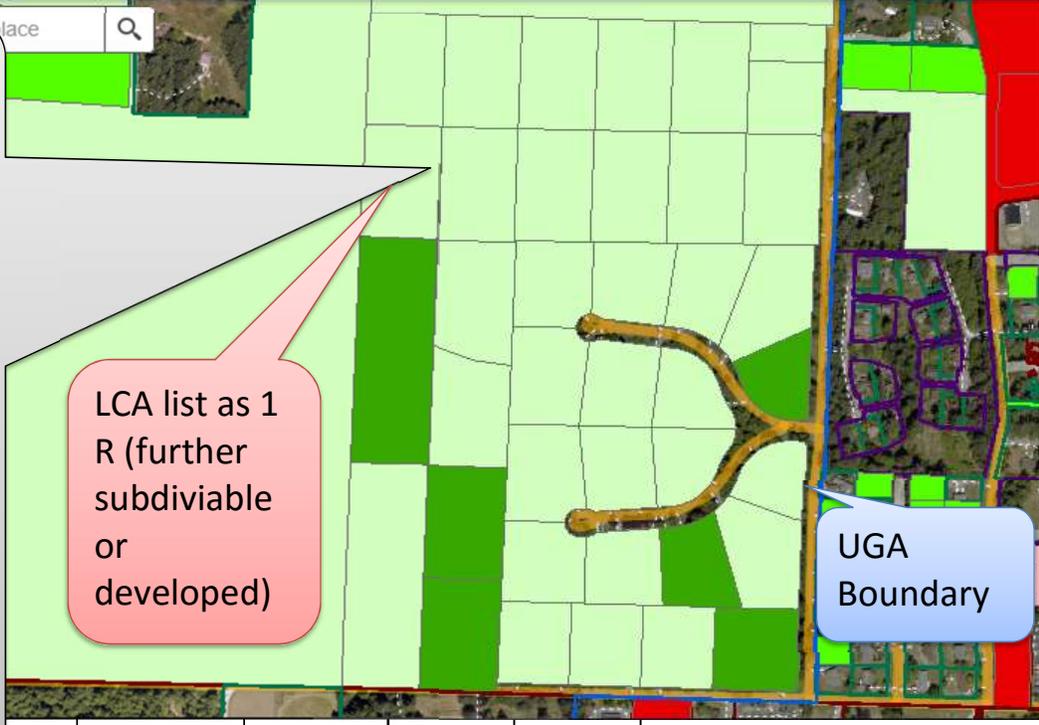
	EPRC Land Capacity Analysis COMMENTS			Pkamin/EPRC		Revised 6/24/19
	From 6/20/19 meeting					
Reference LINE #	Parcel#	Common Name	Address	SJC Designation	EPRC Proposal	Comments
1	271553208000	Trading Post	488 Prune	4 MU	0 R	fully developed, historically residential
2	271414013000	Roses Café	382 Prune	2 MU	0 MU	Rose's occupies two adjacent parcels, both fully developed
3	271414014000	Hennigson	N of library park	2 MU	2 P	Owner intent is to preserve as part of park.
4	271455108000	Budnick	176 Prune	4 MU	0 MU	Property Value and owners unlikely to support redevelopment
5	271455106000	Island Market Parking		2 MU	0 MU	Existing parking required to support Market, thus lot not available for future development
6	271455104000	Island Market Parking		2 MU	0 MU	Existing parking required to support Market, thus lot not available for future development
7	271455101000	CenturyLink	423 Main	0 CL	0 P	CenturyLink is UTILITY vs Commercial lot fully developed.
8	271455102000	Lower Tavern	46 Prune	4 MU	0 MU	Tavern is successful business, hard to imagine lot being redeveloped
9	271455205000	Templin's Parking Lot		2 MU	0 MU	Existing Parking required for Templin's thus lot not available for new development
10	271455205000	Kitchen/Barnicle	238 N. Beach	4 MU	0 MU	Building value inaccurate following recent improvements, decks, kitchen,bath, barnicle.....
11	271414020000	Crawford	432 N. Beach	0 CL	4 MU	Two lots linked due to parking requirements. Combined value of both lots meets "redevelopable bldg/lot equation. (long standing vacancy also suggests redevelopable designation)
12	271452204000	Crawford	433 N. Beach	2 MU		
13	271452207000	Woodward	474 N Beach	0 R	0 MU	current use includes both commercial and residential.
14	271453101000	Aldort	497 Pine	2 MU	4 MU	Current use is multi family residential, even though building value is low.
15	271453102000	Aldort	485 Pine	2 MU	4 MU	Current use is multi family residential, even though building value is low.
16	271453103000	Aldort	469 Pine	2 MU	4 MU	Current use is multi family residential, even though building value is low.
17	271453106000	Jewell	463 Rose	4 MU	0 R	New Manufactured home, unlikely to be redeveloped anytime soon.
18	271453201000	Cable Comp.	School and Pine	2 MU	4 MU	Utility designation? Certainly redevelopable, but not vacant.
19	271454105000	Islanders Bank	Fern St	0 CL	0 MU	This lot is bank parking, not fully developed, but neither is it redevelopable.
20	271454106000	Islanders Bank	475 fern	2 MU	0 MU	Islanders Bank Building, not vacant
21	271454205000	Islanders Bank	475 fern	2 MU	0 MU	Islanders Bank Building, not vacant
22	271453303000	M Williams	451 Madrona	4 MU	0 R	Permitted for addition of 2nd living unit, will change value ratio
23	271453306000	S Mustard	411 Madrona	4 MU	0 MU	Relatively new Mixed commercial/residential construction, hard to imagine redevelopment
24	271454305000	Andrew	261 Madrona	0 CL	0 MU	currently residential rental, former commercial
25	271441004000	Island Market		0 CL		Recent BLM added approx. .33 acre parcel abutting Fern, certainly purchased for some form of additional development.

26	271453401000	Madrona Manor	480 Madrona	4 MU	0 R	Relatively new residential building, unlikely to be redeveloped in 20 yr horizon
27	271453403000	Orr	452 Madrona	4 MU	0 R	Existing residence, barely meets redevelopment value ratio
28	271453404000	Arbutus	434 Madrona	0 CL	0 MU	Existing residential and commercial tenants
29	271453407001	OPAL	432 Madrona	4 MU	0 R	OPAL homeowner lease precludes redevelopment, must remain affordable housing.
30	271453408001	OPAL	433 Madrona	4 MU	0 R	
31	271460032000	Wulff		2 MU	0 MU	Required Parking for 596 Main
32	271460033000	Wulff		2 MU	0 MU	Required road access for 596 Main
33	271460052000	Gudgell		4 MU		Limited redevelopment potential. Parking required for other developments.
34	271460075000	Gudgell		2 MU		Limited redevelopment potential. Parking required for other developments.
35	271451011000	Pawki/ Nelson	199 Main	4 MU	4 MU	significant Wetland limitations impact future development potential
36	271451008000	Landmark		2 R	0 MU	Landmark more hotel than residential, either way fully developed.
37	271413024000	Cohen	south of Athletic Center	2 MU		Athletic Center Geo Thermal infrastructure on property limits future development potential
38	271412013000	Port of Orcas	N of saw shop	2 CL	2 P	Port property, runway flyover/wetlands/FAA funding preclude SLI development.
39	271412009000	Port of Orcas		2 CL	2 P	Port property, runway flyover/wetlands/FAA funding preclude SLI development.
40	271412010000	Port of Orcas		2 CL	2 P	Port property, runway flyover/wetlands/FAA funding preclude SLI development.
41	271322001000	Cemetery		3 R	2 P	Cemetery, can't be developed
42	271142017000	Sewer District	Cesena	2 CL	0 P	District is Utility
43	271142023000	Port of Orcas	West of Runway	2 CL	0 P	Public land, port owned, wetland incombred, FAA funding allows only port related uses. Tree mitigation
44	271142023000	Port of Orcas				parcel does not show up on polaris?
45	271142014000	Griot/Smallwood		0 CL	4 CL	rare Underdeveloped SLI parcel.
46	271461026000	Opal EWUA	286 Enchanted	3 R	0 MU	Fully developed with offices, and apartments.
47	West of Blanchard	Los Arbolos		1 R	0 R or 4 R	Eastsound Rural Residential 1 unit per 5 acre, NONE OF THESE LOTS ARE SUBDIVIDABLE
48	271141002000	Otten	End of Autumn	1 R	1 R or 4 R	Eastsound Rural 1 unit per 5 acres NOT Subdividable.
49	271158003000	Hanger Sites?		2 CL		Location inside port fence limits uses?
50	271158005000	Hanger Sites?		2 CL		Location inside port fence limits uses?
51	271158004000	Hanger Sites?		2 CL		Location inside port fence limits uses?
52	271158011000	Propone Site	Seaview/Aero view	0 - P	3 CL	Is propane delivery a utility? San Juan Propane not designated as such?
53	271413008000	2nd Star parking	A St.	2 MU	0 MU	parcel only parking spaces in support of lindholm real estate building.



White # in black box = # of existing living units currently on property. While property may be likely to be redeveloped, such redevelopment will not create new residential density.

Parcels such as this one are outside the UGA, thus min. lot size is 5 acres. How do these lots have additional development potential?



LCA list as 1 R (further subdiviable or developed)

UGA Boundary

This map is of Terri Ln, Michael Ln, and Timber Lane. The same concern applies to properties in View Haven, Sunset, Scenic, Echo and Fossil Bay.

Adam Zack

From: Erika Shook
Sent: Monday, July 1, 2019 9:38 AM
To: Comp Plan Update
Subject: FW: EPRC Land Capacity Analysis COMMENTS.xlsx
Attachments: EPRC Land Capacity Analysis COMMENTS.pdf

From: Paul Kamin EWUA <pkamin@rockisland.com>
Sent: Monday, July 1, 2019 9:34 AM
To: Brian Wiese <brian_wiese@outlook.com>; Kangaroo House B&B <innkeeper@kangaroohouse.com>; Terry Gillespie <terrywg57@gmail.com>; Leith Templin <leithtemplin@hotmail.com>; joAn Mann <jo.an.a.mann@gmail.com>
Cc: Erika Shook <erikas@sanjuanco.com>; Rick Hughes <rickh@sanjuanco.com>; John Campbell <jmc779@rockisland.com>
Subject: EPRC Land Capacity Analysis COMMENTS.xlsx

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.

EPRC Members,

Attached is the latest version of our Land Use Analysis comments. This reflects our 3 “work group” meetings, the last been Friday’s.

We have not other meetings planned prior to our “monthly” July meeting which is planned for Tuesday the 9th.

I have included my best effort at including the “special questions” that came up during our work group sessions.

I want to thank John Campbell for joining in and adding his perspective to our efforts.

In the Spirit of Service,

Paul Kamin
General Manager
Eastsound Water Users Association
360 376 2127
pkamin@rockisland.com

EPRC Land Capacity Analysis COMMENTS

Pkamin/EPRC

Revised 7/1/19

Reference LINE #	Parcel#	Common Name	Address	SJC Designation	EPRC Proposal	Comments
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27	271453403000	Orr	452 Madrona	4 MU	0 R	Existing residence, barely meets redevelopment value ratio
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29	271453407001	OPAL	432 Madrona	4 MU	0 R	OPAL homeowner lease precludes redevelopment, must remain affordable housing.
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43	271142023000	Port of Orcas	West of Runway	2 CL	0 P	Public land, port owned, wetland incomed, FAA funding allows only port related uses. Tree mitigation
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45	271142014000	Griot/Smallwood		0 CL	4 CL	rare Underdeveloped SLI parcel.
46	271461026000	Opal EWUA	286 Enchanted	3 R	0 MU	Fully developed with offices, and apartments.
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52	271158011000	Propone Site	Seaview/Aero view	0 - P	3 CL	Is propane delivery a utility? San Juan Propane not designated as such?
53	271413008000	2nd Star parking	A St.	2 MU	0 MU	parcel only parking spaces in support of lindholm real estate building.
54	271413012000	Seaview Theater	234 A St.	0 CL	4 MU	theater building over valued by assessor, lot highly redevelopable, business just hanging on.

55	271413015000	Zukin/Duke	215 A St	2 MU	2 MU	significant wetlands impacts development potential
56	271413024000	Cohen		2 MU	2 MU	Athletic Center geo-thermal on lot impacts development potential.
57	271451006000	LeRoy	45 Main. St	2 R	2 MU	Believe property is in expanded Village commercial not former village residential
58	271451008000	Landmark Inn	Main St	2 R	0 MU	Landmark has 16 units on it, and now in village commercial.
59	271449051000	Landmark Inn	Main St			Landmark parking unlikely redevelopable.
60	271451011000	Pawki's	199 Main St	4 MU	4 MU	Significant wetlands impacts development potential
61	271460052000	Steward Blackington	460 Main ST	2 MU	2 MU	Lot incumberd by parking that supports development on other parcels
62	271460075000	fishing Bay	Haven	2 M U	2 MU	Lot incumberd by parking that supports development on other parcels
63	271460061000	Wild Island	Urner St			Land use maps shows 2 parcels, polaris shows just one.?
64	271460074000	GlenHari Group	155 Harrison Pt	0 R	4 R	larger parcel, 12 units per acre potentail, only one older house currently, seems like it has high redevelopment potential?
65	271353001000	Land Bank	Crescent Beach	2 R	2 P	Land Bank owned Should be Public
66	271113005000	Brandt's Landing		0 P	1 CL	privately owned marina, significant development potential remains
67	27141201100	Segault	Enchanted Forest	3 R	0 R	Wetlands severely limit development
68	271412012000	OPAL	Lavender Hollow	1 R	0 R	22 units, no room for more development
69	271142004000	Toxey	Kangaroo House	0 CL	1 CL	owner intents significant additional development
70	271233001000	3 Bad Bitches	Mt Baker Farm	3 R	3 R	ratio of allowable use seem incorrect. Should be .39 not .02?

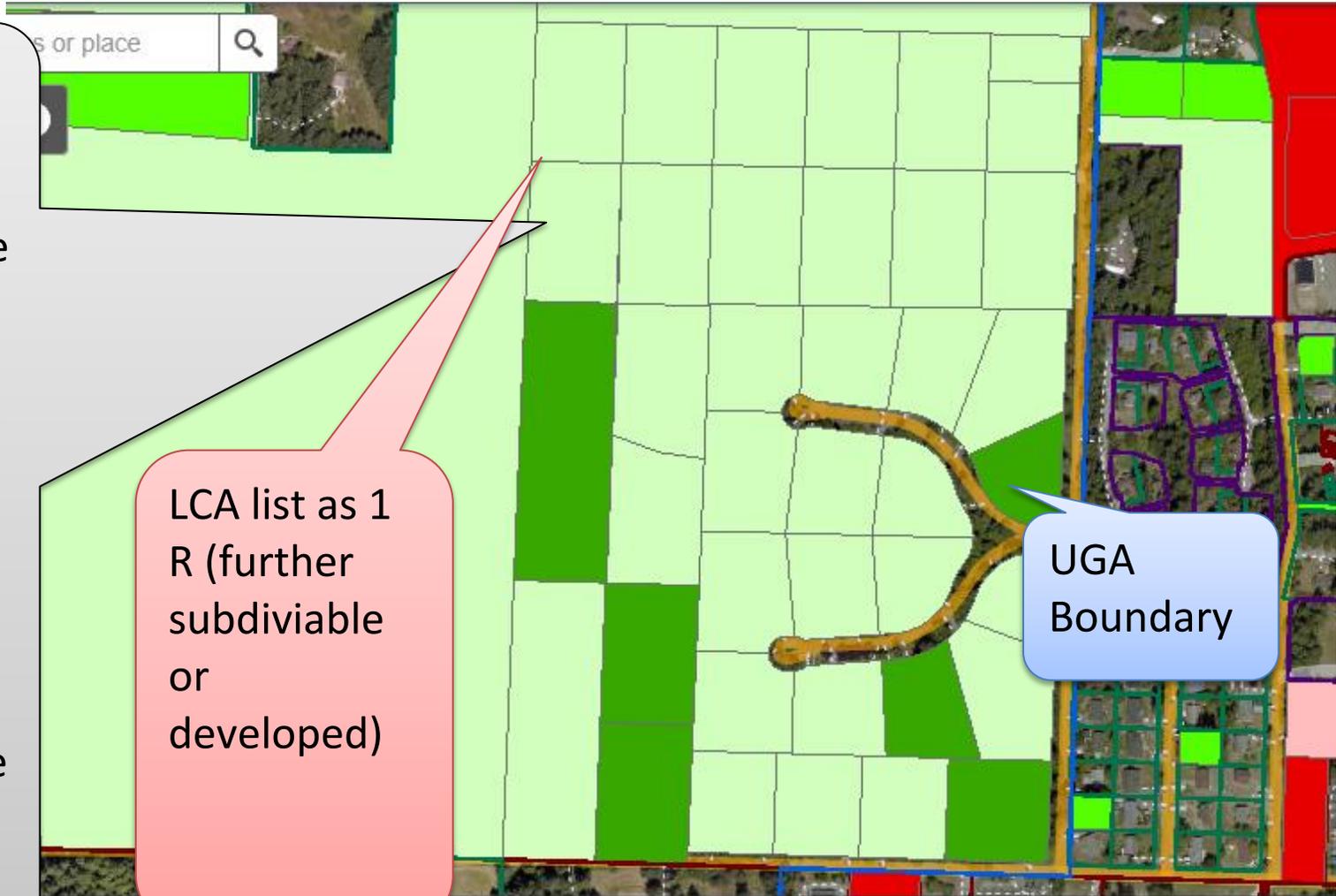
71	271343005000	Doorison	Olga Rd	1 R	0 R	Lot less than 2 acres, within Land Use Designation w/ min. 2 acres sizes. How does it have additional development potential?
72	271343006000	Salty Cove	Olga Rd	1 R	0 R	Lot less than 2 acres, within Land Use Designation w/ min. 2 acres sizes. How does it have additional development potential?
73	271350016000	Carpenter/Harlov The Barn		0 CL	1 CL	Property has additional development potential give lot size.
74	271461026000	OPAL	Redick Office	3 R	0 R	fully developed office and residential wetlands severely limits additional development on adjacent lots.

Parcels such as this one are outside the UGA, thus min. lot size is 5 acres. How do these lots have additional development potential?

LCA list as 1 R (further subdiviable or developed)

UGA Boundary

This map is of Terri Ln, Michael Ln, and Timber Lane. The same concern applies to properties in View Haven, Sunset, Scenic, Echo and Fossil Bay, and Olga Rd.. "Script" may not properly factor UGA boundaries or Land Use Designation min. lot size?



EPRC Questions for July 9 Meeting w/ Erika

In village commercial, what ratio of commercial and residential development be assigned to mixed use parcels?

In village commercial the Land Use Analysis evisions all residential parcels moving towards mixed use (Commercial and Residential).

Is any accomdation in the UGA's residential development being made for the potential loss of the existing residential density as properties are "encouraged" to be transisioned to commerical use.

"vision for eastsound" includes a strong mix of residential and commerical uses. A process that seeks to replace SFH uses in Vllage commercial would seem counter to that vision. How is county plan going to include residential in eastsound core?

A significant number of recent new residential developments have quickly been converted to vacation rentals.

DeMerritt on Prune 3 out of 4 in vacation rental

Adele 5 out of 6 not residential use

Campbell Miller on Haven multiple units being coverted to VR before construction is complete

Is there a plan to incorporate the significant number of Vacation Rental permits into estimates of future housing

How will the significant number of new residential developments that are being used built as second home impact projections of future avaiable residential housing/

How will you integrate the new development that has occurred since 2017 into the future projections?

There does not appear to be a minimum lot size in village commercial. It that an oversight? Should there be in order to maximimize future development density?

How does airport overlay district impact development potential of David McPeak's lot between christian school and fire department?

Is there flexibility in the Land Alalysis to change building/land ratio to give value to thriving buisnesses?

Adam Zack

From: mckin2@centurytel.net
Sent: Monday, July 8, 2019 2:38 PM
To: Comp Plan Update
Cc: mckin2@centurytel.net
Subject: comp plan comments

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.

Parcel 271433004000 Orcas Island

Land Value: \$94,100.00 "laugh out loud"

Category and Type: 3,R

It would have been helpful were the Category and type been provided on the map

I really don't have time to find the proper category

This parcel only serves as a driveway to one parcel.

It has no developable value as the Orcas road cut leaves it at least 30 foot in elevation from accessibility by any party other than the party using it as access.

Evelyn F Fuchser

Adam Zack

From: mckin2@centurytel.net
Sent: Monday, July 8, 2019 2:39 PM
To: Comp Plan Update
Cc: mckin2@centurytel.net
Subject: comp plan comments

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.

Category and Type: 3,R
Parcel Number: 271544003000
Category: 3
Type: R
Land Use: RFF
Assessor's Use Code: 9100
Land Value: \$339,440.00
Building Value: \$0.00
Building to Land Value: 0.00
Ratio of Allowed Density to Parcel Area: 0.27
Density: 5
Parcel Area: 18.66 ac
Island: Orcas

Here we have a Parcel almost completely covered in Critical area
A very small portion only being accessible from the road above Panoramic Drive.
The property is very steep and access to the lower 18 acres is simply not possible.
This property would be an ideal Open space parcel
Evelyn F Fuchser

Draft Gross Developable Lands Inventory (GDLI) Parcels with Comments

Table 1. Gross Developable Lands Inventory Parcels with Public Comments⁸

Parcel Number	Assigned Cat/Type	Proposed Cat/Type	Submitted By	Staff Response	Was Change Made (Y/N/D ⁹)
271044001000	N/A		Craig Gibson	Parcel was created after the data snapshot was taken ¹ . DFL does not affect capacity. Changes to parcel boundaries would be shown on subsequent analysis but will not be shown on this analysis.	N
271041001000	1, R	N/A	Craig Gibson	This parcel is shown as partially used because there is an existing dwelling and it could be subdivided. This parcel has an existing commercial use (use code 7500) but there is additional residential capacity here. The Cat/Type 1, R correctly shows the additional residential capacity. No change made.	N
271133003000	1, R	N/A	Craig Gibson	Mr. Gibson provided several parcels in this area. Upon further review, staff determined that the density value ERR2 was not correctly applied in the script ⁵ .	Y
271152020000	2, R	0, R	Lisa Byers	Building was built around the time of the snapshot ¹ . Changed to 0, R	Y
271461026000	3, R	0, R	Lisa Byers	No change recommended because wetlands ² will be subtracted during the next step of the LCA. This parcel should be double checked during review of the NDLI.	N
271461026000	3, R	0, R	Lisa Byers	Site of an existing multi-family development (use code 1200). Changed to 0, R	Y
271411007000	3, R	0, R	Lisa Byers	This parcel is the location for the pending April's Grove housing development. Pending development is summarized and deducted in steps three and four of the LCA Methodology. This will capture the additional housing this parcel will provide and address Ms. Byers comment.	N

Draft Gross Developable Lands Inventory (GDLI) Parcels with Comments

Parcel Number	Assigned Cat/Type	Proposed Cat/Type	Submitted By	Staff Response	Was Change Made (Y/N/D ⁹)
271412012000	1, R	0, R	Lisa Byers	Site of an existing multi-family development (use code 1300). Changed to 0, R	Y
271412011000	3, R	0, R	Lisa Byers	No change recommended because wetlands ² will be subtracted during the next step of the LCA. This parcel should be double-checked during review of the NDLI.	N
271412010000	2, CI	0, P	Lisa Byers	No change recommended because wetlands ² will be subtracted during the next step of the LCA. This parcel should be double-checked during review of the NDLI. The commenter was also concerned about the airport overlay ⁶ .	N
271412009000	2, CI	0, P	Lisa Byers	No change recommended because wetlands ² will be subtracted during the next step of the LCA. This parcel should be double-checked during review of the NDLI. The commenter was also concerned about the airport overlay ⁶ .	N
271412013000	2, CI	0, P	Lisa Byers	No change recommended because wetlands ² will be subtracted during the next step of the LCA. This parcel should be double-checked during review of the NDLI. The commenter was also concerned about the airport overlay ⁶ .	N
160850001000	2, R	None	Daniel Gottlieb	This parcel is correctly categorized	N
160850002000	2, R	None	Daniel Gottlieb	This parcel has been reconfigured after the snapshot ¹ and does not have a structure on it. It is correctly categorized.	N
16085003000	2, R	0, R	Daniel Gottlieb	The parcel has a home that was constructed in 2018, after the snapshot ¹ . It is correctly categorized.	N
271453106000	4, MU	0, CI	John Campbell	This parcel is occupied by a single-family residence ⁷ . 4, MU is correct Cat/type.	N

Draft Gross Developable Lands Inventory (GDLI) Parcels with Comments

Parcel Number	Assigned Cat/Type	Proposed Cat/Type	Submitted By	Staff Response	Was Change Made (Y/N/D ⁹)
271453306000	4, MU	0, CI	John Campbell	This parcel is occupied by a single-family residence ⁷ . 4, MU is correct Cat/type.	N
242443001000	0, P	3, R	Sally Reeve	San Juan Preservation Trust (SJPT) conservation easement ³	D ⁹
242434001000	3, R	3, R	Sally Reeve	SJPT conservation easement ³	D ⁹
242444001000	1, R	1, R	Sally Reeve	SJPT conservation easement ³	D ⁹
141934001000	0, P	1, R	Sally Reeve	SJPT conservation easement ³	D ⁹
271350014000	1, R	0, R	Annette Bader and Michael Hayworth	The existing home makes this parcel fully developed. Staff corrected how the script applies the density value ERR2 ⁵ .	Y
271350015000	3, R	2, R	Annette Bader and Michael Hayworth	Problem with ERR2 ⁵ . Corrected the script	Y
272450005000	2, R	0, R	Kevin Walstrom	There is an existing cabin built on this property but its assessed value is below the vacant land value threshold of \$42,000 ⁴ . The assumption is that properties with improvements below this threshold do not necessarily contribute to the inventory of dwelling units and that re-developing the dwelling unit there would effectively be an increase in the number of dwellings.	N
361943002000	0, R	0, CI	Timothy Dwyer	This parcel is located in the RFF land use designation, the assigned type R is the correct type. Changing it to type CI would not be necessary because the property is already categorized as fully developed. Fully developed means that no additional capacity is available on the parcel.	N

Draft Gross Developable Lands Inventory (GDLI) Parcels with Comments

Parcel Number	Assigned Cat/Type	Proposed Cat/Type	Submitted By	Staff Response	Was Change Made (Y/N/D ⁹)
271433004000	3, R		Evelyn Fuchser	Parcel may not be developable because of steep slopes ² .	N
271544003000	3, R		Evelyn Fuchser	Parcel may not be developable because of access and steep slopes ² .	N

Notes

1. The Land Capacity Analysis (LCA) is using a 'snapshot' of parcel data from March 3, 2017, as provided in the *Land Capacity Analysis Methodology* (LCA Methodology). The 'snapshot' provides a static data set for the LCA calculations. Most development that has occurred after the 'snapshot' will not be included in the capacity calculations. Some development that has happened after the 'snapshot' will be summarized in the third step of the analysis. This step will provide some additional context including a summary of development trends.
2. Wetlands, geological hazards, and other critical areas will be deducted during the next stage of the Land Capacity Analysis: the Net Developable Lands Inventory (NDLI). The NDLI will show parcels with capacity minus critical areas, which will be clipped out of the Gross Developable Lands Inventory (GDLI). The process and assumptions that will be used in preparing the NDLI are outlined beginning on page 13 of the draft LCA Methodology.
3. SJPT conservation easements are shown on the GIS layer of public lands, County Parks, and open space. The LCA Methodology specifies on page 10 that parcels shown on this GIS layer should be considered "public, utility, and conservation". Ms. Reeve raises a good point that these parcels may have some development potential despite the fact that they have a conservation easement. Further discussion on how to treat easements is required. Discussion of this issue is included in the August 1, 2019, staff report.
4. During the summer and early fall of 2018, the County Council set the vacant land value threshold used in the LCA Methodology at \$42,000. This was decided after reviewing sample parcels with varying levels of assessed improvement values, as provided in an August 28, 2018 staff report (<https://www.sanjuanco.com/DocumentCenter/View/16809>). Though some parcels below this threshold may have existing development, they are probably not developed to a level that would limit capacity.
5. The initial version of the Land Capacity Analysis script (LCA script) was not correctly calculating the density in the Eastsound Rural Residential (ERR) land use designation. In the data, ERR density was not a numeric value and the LCA script did not translate it correctly. Staff fixed this issue in the script. The next draft of the GDLI will correctly categorize properties in this area.

Draft Gross Developable Lands Inventory (GDLI) Parcels with Comments

6. The airport overlay includes specific parameters on how development may or may not occur depending on the zone within the overlay. These parameters are defined by several sections of Title 18 SJCC. This includes some limitations on the siting of specific uses adjacent to the Orcas Island Airport. The airport overlay does not categorically prohibit development except for SJCC 18.40.032 (A)(1), which prohibits new structures airport hazard zone 1. Zone 1 coincides with extensive wetlands that will be subtracted from the inventory of developable lands in the next step of the process (note 2).
7. In Table 1 of the LCA Methodology, parcels within mixed-use designations (i.e. Eastsound Village Commercial and Eastsound Marina) are categorized as re-developable if they are occupied by a single-family residence (SFR). This was determined if the parcel has an Assessor's use code beginning with '11', all of which are SFR use codes. A mixed-use parcel that only has an SFR has existing development potential because the current regulations allow for more intense development, including additional commercial development. For example, if a parcel is categorized as 4, MU, (re-developable mixed use) that means that some amount of development may occur in the future. This does not necessarily mean that the SFR would be replaced by commercial uses, but rather that some additional commercial development may happen on that parcel.
8. The Eastsound Planning and Review Committee (EPRC) provided comments on X parcels within the Eastsound UGA. These comments are addressed in their own document, Attachment X of this staff report.
9. "D" indicates that the decision on a possible change requires additional discussion.

Draft Gross Developable Lands Inventory (GDLI) Parcels with EPRC Comments

Table 2. Gross Developable Lands Inventory Parcels with EPRC Comments

Parcel Number	Assigned Cat/Type	Proposed Cat/Type	EPRC Comment	Staff Response	Was Change Made (Y/N/D ⁷)
271553208000	4 MU	0 R	fully developed, historically residential	Parcel number not found.	N
271414013000	2 MU	0 MU	Rose's occupies two adjacent parcels, both fully developed	Building from neighboring lot covers this parcel too. Changed to 0, MU	Y
271414014000	2 MU	2 P	Owner intent is to preserve as part of park.	Existing Development and regulations do not prevent this parcel from re-developing ⁸	N
271455108000	4 MU	0 MU	Property Value and owners unlikely to support redevelopment	SFR in commercial, industrial, and mixed-use area ⁹	D
271455106000	2 MU	0 MU	Existing parking required to support Market, thus lot not available for future development	Parking lots ¹⁰	D
271455104000	2 MU	0 MU	Existing parking required to support Market, thus lot not available for future development	Parking lots ¹⁰	D
271455101000	0 CL	0 P	CenturyLink is UTILITY vs Commercial lot fully developed.	Being categorized as fully developed already subtracts this parcel from the developable lands inventory. Additional changes are not necessary.	N
271455102000	4 MU	0 MU	Tavern is successful business, hard to imagine lot being redeveloped	Please see July 8, 2019 memo (Attachment A)	N
271455205000	2 MU	0 MU	Existing Parking required for Templin's thus lot not available for new development	Parking lots ¹⁰	D

Draft Gross Developable Lands Inventory (GDLI) Parcels with EPRC Comments

Parcel Number	Assigned Cat/Type	Proposed Cat/Type	EPRC Comment	Staff Response	Was Change Made (Y/N/D ⁷)
271455213000	4 MU	0 MU	Building value inaccurate following recent improvements, decks, kitchen,bath, barnicle.....	Increased value in improvements are not shown in the data snapshot ¹ and is not shown on the assessment information on Polaris	N
271414020000	0 CI	4 MU	Two lots linked due to parking requirements. Combined valve of both lots meets "redevelopable bldg/lot equation. (long standing vacancy also suggests redevelopable designation)	This lot meets the fully developed criteria in the LCA Methodology.	N
271452204000	2 MU	4 MU	Two lots linked due to parking requirements. Combined valve of both lots meets "redevelopable bldg/lot equation. (long standing vacancy also suggests redevelopable designation)	Parking Lots ¹⁰	D
271452207000	0 R	0 MU	current use includes both commercial and residential.	Being categorized as fully developed already subtracts this parcel from the developable lands inventory. Additional changes are not necessary.	N
271453101000	2 MU	4 MU	Current use is multi family residential, even though building value is low.	Meets criteria for 2, MU in the LCA Methodology.	N
271453102000	2 MU	4 MU	Current use is multi family residential, even though building value is low.	Meets criteria for 2, MU in the LCA Methodology.	N
271453103000	2 MU	4 MU	Current use is multi family residential, even though building value is low.	Meets criteria for 2, MU in the LCA Methodology.	N
271453106000	4 MU	0 R	New Manufactured home, unlikely to be redeveloped anytime soon.	SFR in mixed use area ⁹	D

Draft Gross Developable Lands Inventory (GDLI) Parcels with EPRC Comments

Parcel Number	Assigned Cat/Type	Proposed Cat/Type	EPRC Comment	Staff Response	Was Change Made (Y/N/D ⁷)
271453201000	2 MU	4 MU	Utility designation? Certainly redevelopable, but not vacant.	Improvement value is \$13,880, well below the vacant land improvement value threshold. Though there is a structure there, it is not assumed to represent a significant barrier to new development of the parcel.	N
271454105000	0 CL	0 MU	This lot is bank parking, not fully developed, but neither is it redevelopable.	Being categorized as fully developed already subtracts this parcel from the developable lands inventory. Additional changes are not necessary.	N
27145410600	2 MU	0 MU	Islanders Bank Building, not vacant	Value of the improvement is not linked with the parcel ¹¹ , change to 0, CI	Y
271454205000	2 MU	0 MU	Islanders Bank Building, not vacant	Value of the improvement is not linked with the parcel ¹¹ , change to 0, CI	Y
271453303000	4 MU	0 R	Permitted for addition of 2nd living unit, will change value ratio	Any additional dwelling unit on this parcel would be after the data snapshot ¹ .	N
271453306000	4 MU	0 MU	Relatively new Mixed commercial/residential construction, hard to imagine redevelopment	Mixed use development before the snapshot ¹ but the Assessor's code has not been updated yet, changed to 0, MU	Y

Draft Gross Developable Lands Inventory (GDLI) Parcels with EPRC Comments

Parcel Number	Assigned Cat/Type	Proposed Cat/Type	EPRC Comment	Staff Response	Was Change Made (Y/N/D ⁷)
271454305000	0 CL	0 MU	currently residential rental, former commercial	Being categorized as fully developed already subtracts this parcel from the developable lands inventory. Additional changes are not necessary.	N
271441004000	0, CI		Recent BLM added aprox. .33 acre parcel abutting Fern, certainly purchased for some form of additional development.	Neighboring parcel that added acreage is categorized as re-developable. This will adequately capture whatever development potential exists.	N
271453401000	4 MU	0 R	Relatively new residential building, unlikely to be redeveloped in 20 yr horizon	SFR in commercial, industrial, and mixed-use area ⁹	D
271453403000	4 MU	0 R	Existing residence, barely meets redevelopment value ratio	SFR in commercial, industrial, and mixed-use area ⁹	D
271453404000	0 CL	0 MU	Existing residential and commercial tenants	Being categorized as fully developed already subtracts this parcel from the developable lands inventory. Additional changes are not necessary.	N
271453407001	4 MU	0 R	OPAL homeowner lease precludes redevelopment, must remain affordable housing.	SFR in commercial, industrial, and mixed-use area ⁹	D
271453408001	4 MU	0 R	OPAL homeowner lease precludes redevelopment, must remain affordable housing.	SFR in commercial, industrial, and mixed-use area ⁹	D
271460032000	2 MU	0 MU	Required Parking for 596 Main	Parking Lots ¹⁰	D

Draft Gross Developable Lands Inventory (GDLI) Parcels with EPRC Comments

Parcel Number	Assigned Cat/Type	Proposed Cat/Type	EPRC Comment	Staff Response	Was Change Made (Y/N/D ⁷)
271460033000	2 MU	0 MU	Required road access for 596 Main	Issue is similar to parking Lots ¹⁰	D
271460052000	4 MU		Limited redevelopment potential. Parking required for other developments.	Parking Lots ¹⁰	D
271460075000	2 MU		Limited redevelopment potential. Parking required for other developments.	Parking Lots ¹⁰	D
271451011000	4 MU	4 MU	significant Wetland limitations impact future development potential	Wetlands ²	N
271451008000	2 R	0 MU	Landmark more hotel than residential, either way fully developed.	Value of the improvement is not linked with the parcel ¹¹ , change to 0, CI	Y
271413024000	2 MU		Athletic Center Geo Thermal infrastructure on properly limits future development potential	There are not improvements significant enough to change the vacant categorization	N
271412013000	2 CL	2 P	Port property, runway flyover/wetlands/FAA funding preclude SLI development.	Wetlands ²	N
271412009000	2 CL	2 P	Port property, runway flyover/wetlands/FAA funding preclude SLI development.	Wetlands ²	N
271322001000	3 R	2 P	Cemetary, can't be developed	Changed to 0, P	Y
271142017000	2 CL	0 P	District is Utility	Owned by Eastsound Water Users Association, changed to 0, P	Y
271142023000	2 CL	0 P	Public land, port owned, wetland incombered, FAA funding allows only port related uses. Tree mitigation	Parcel is categorized as 0, CI. Port uses, though in public ownership, are regarded as commercial/industrial for our purposes.	N

Draft Gross Developable Lands Inventory (GDLI) Parcels with EPRC Comments

Parcel Number	Assigned Cat/Type	Proposed Cat/Type	EPRC Comment	Staff Response	Was Change Made (Y/N/D ⁷)
271142023000			parcel does not show up on polaris?		
271142014000	0 CL	4 CL	rare Underdeveloped SLI parcel.	Building to land value is greater than 1. Parcel is correctly categorized as fully developed.	N
271461026000	3 R	0 MU	Fully developed with offices, and apartments.	Site of an existing multi-family development (use code 1200). Changed to 0, R	Y
West of Blanchard	1 R	0 R or 4 R	Eastsound Rural Residential 1 unit per 5 acre, NONE OF THESE LOTS ARE SUBDIVIDABLE	Upon further review, staff determined that the density value ERR2 was not correctly applied in the script ¹² .	Y
271141002000	1 R	1 R or 4 R	Eastsound Rural 1 unit per 5 acres NOT Subdividable.	Upon further review, staff determined that the density value ERR2 was not correctly applied in the script ¹² .	Y
271158003000	2 CL		Location inside port fence limits uses?	Parcel is categorized as 2, Cl. Port uses, though in public ownership, are regarded as commercial/industrial for our purposes.	N
271158005000	2 CL		Location inside port fence limits uses?	Parcel is categorized as 2, Cl. Port uses, though in public ownership, are regarded as commercial/industrial for our purposes.	N

Draft Gross Developable Lands Inventory (GDLI) Parcels with EPRC Comments

Parcel Number	Assigned Cat/Type	Proposed Cat/Type	EPRC Comment	Staff Response	Was Change Made (Y/N/D ⁷)
271158004000	2 CL		Location inside port fence limits uses?	Parcel is categorized as 2, CI. Port uses, though in public ownership, are regarded as commercial/industrial for our purposes.	N
271413008000	2 MU	0 MU	parcel only parking spaces in support of lindholm real estate building.	Parking Lots ¹⁰	D
271413012000	0 CL	4 MU	theater building over valued by assessor, lot highly redevelopable, business just hanging on.	Building to land value is greater than 1. Parcel is correctly categorized as fully developed.	N
271413015000	2 MU	2 MU	significant wetlands impacts development potential	Wetlands ²	
271413024000	2 MU	2 MU	Athletic Center geo-thermal on lot impacts development potential.	There are not improvements significant enough to change the vacant categorization	N
271451006000	2 R	2 MU	Believe property is in expanded Village commercial not former village residential	Parcel is designated Village Residential.	N
271451008000	2 R	0 MU	Landmark has 16 units on it, and now in village commercial.	Value of the improvement is not linked with the parcel ¹¹ , change to 0, CI	Y
271449051000			Landmark parking unlikely redevelopable.	Parking Lots ¹⁰	D
271451011000	4 MU	4 MU	Significant wetlands impacts development potential	Wetlands ²	N
271460052000	2 MU	2 MU	Lot incumberd by parking that supports development on other parcels	Parking Lots ¹⁰	D
271460075000	2 M U	2 MU	Lot incumberd by parking that supports development on other parcels	Parking Lots ¹⁰	D

Draft Gross Developable Lands Inventory (GDLI) Parcels with EPRC Comments

Parcel Number	Assigned Cat/Type	Proposed Cat/Type	EPRC Comment	Staff Response	Was Change Made (Y/N/D ⁷)
271460074000	0 R	4 R	larger parcel, 12 units per acre potential, only one older house currently, seems like it has high redevelopment potential?	Lot has existing SFR and could be subdivided, should be 1, R	Y
271353001000	2 R	2 P	Land Bank owned Should be Public	Change to 0, P	Y
271113005000	0 P	1 CL	privately owned marina, significant development potential remains	The majority of the improvement value on this parcel is the marina. One improvement on this parcel is located on the land. This parcel should be 4, MU	Y
27141201100	3 R	0 R	Wetlands severely limit development	Wetlands ²	N
271412012000	1 R	0 R	22 units, no room for more development	Site of an existing multi-family development (use code 1300). Changed to 0, R	Y
271142004000	0 CL	1 CL	owner intends significant additional development	There is an existing commercial development on this parcel. Even if it is re-developed, it would not represent a significant change in capacity.	N
271461026000	3 R	0 R	fully developed office and residential wetlands severely limits additional development on adjacent lots.	Site of an existing multi-family development (use code 1200). Changed to 0, R	Y

Draft Gross Developable Lands Inventory (GDLI) Parcels with EPRC Comments**Notes**

1. The Land Capacity Analysis (LCA) is using a 'snapshot' of parcel data from March 3, 2017, as provided in the *Land Capacity Analysis Methodology* (LCA Methodology). The 'snapshot' provides a static data set for the LCA calculations. Most development that has occurred after the 'snapshot' will not be included in the capacity calculations. Some development that has happened after the 'snapshot' will be summarized in the third step of the analysis. This step will provide some additional context including a summary of development trends.
2. Wetlands, geological hazards, and other critical areas will be deducted during the next stage of the Land Capacity Analysis: the Net Developable Lands Inventory (NDLI). The NDLI will show parcels with capacity minus critical areas, which will be clipped out of the Gross Developable Lands Inventory (GDLI). The process and assumptions that will be used in preparing the NDLI are outlined beginning on page 13 of the draft LCA Methodology.
3. During the summer and early fall of 2018, the County Council set the vacant land value threshold used in the LCA Methodology at \$42,000. This was decided after reviewing sample parcels with varying levels of assessed improvement values, as provided in an August 28, 2018 staff report (<https://www.sanjuanco.com/DocumentCenter/View/16809>). Though some parcels below this threshold may have existing development, they are probably not developed to a level that would limit capacity.
4. The initial version of the Land Capacity Analysis script (LCA script) was not correctly calculating the density in the Eastsound Rural Residential (ERR) land use designation. In the data, ERR density was not a numeric value and the LCA script did not translate it correctly. Staff fixed this issue in the script. The next draft of the GDLI will correctly categorize properties in this area.
5. The airport overlay includes specific parameters on how development may or may not occur depending on the zone within the overlay. These parameters are defined by several sections of Title 18 SJCC. This includes some limitations on the siting of specific uses adjacent to the Orcas Island Airport. The airport overlay does not categorically prohibit development. SJCC 18.40.032 (A)(1) prohibits new structures airport hazard zone 1. This area coincides with extensive wetlands that will be subtracted from the inventory of developable lands in the next step of the process (note 2).
6. In Table 1 of the LCA Methodology, parcels within mixed-use designations (i.e. Eastsound Village Commercial and Eastsound Marina) are categorized as re-developable if they are occupied by a single-family residence (SFR). This was determined if the parcel has an Assessor's use code beginning with '11', all of which are SFR use codes. A mixed-use parcel that only has an SFR has existing development potential because the current regulations allow for more intense development. For example, if a parcel is categorized as 4, MU, (re-developable mixed use) that means that some amount of development may occur in the future. This does not necessarily mean that the SFR would be replaced by commercial uses, but rather that some additional commercial development may happen on that parcel.
7. "D" indicates that the decision on a possible change requires additional discussion.

Draft Gross Developable Lands Inventory (GDLI) Parcels with EPRC Comments

8. The LCA is, in part, an effort to calculate how much development is possible given current regulations and existing development. Non-regulatory factors that may not show in the LCA data set are difficult to quantify and may not permanently limit the development potential of a parcel.
9. Single-family residences (SFR) in commercial, industrial and mixed-use areas are considered re-developable because they are a 'lower-intensity' use than what is allowed. In other words, SFR in these areas have additional development potential under current regulations. See the August 1, 2019 staff report for more discussion.
10. In the LCA Methodology, parking lots in commercial, industrial, and mixed-use designations are considered re-developable if the building to land value ratio is less than or equal to one. Parking lots are treated the same as any other structures. Essentially, the LCA Methodology assumes that if the land is more valuable than the structures on it, that parcel may be re-developed. See the August 1, 2019 staff report for more discussion.
11. The building values for some developments, particularly condominiums, are not linked to the underlying parcel. In these instances, the LCA script will not capture the development there.
12. The initial version of the Land Capacity Analysis script (LCA script) was not correctly calculating the density in the Eastsound Rural Residential (ERR) land use designation. In the data, ERR density was not a numeric value and the LCA script did not translate it correctly. Staff fixed this issue in the script. The next draft of the GDLI will correctly categorize properties in this area.

Table 1. General Public Comments with Staff Response

Name	Comment Number ¹	Date	Summary of Comment	Staff Response
Lincoln Bormann	1	6/6/19	Some summer camps may not be fully developed. There have been instances outside the County, of summer camp properties being re-developed when the owners decide to sell some of their holdings.	A detailed staff response was provided in a reply email included with Comment 1 (Attachment B).
John Campbell	3	6/16/19	The County should conduct a LCA for the Town of Friday Harbor during the Countywide process ² .	The Town of Friday Harbor is not included in the current LCA Methodology. The Town is responsible for and manages their Comprehensive Plan within their jurisdiction. Including the Town would substantially expand the scope of the LCA. No change is recommended.
John Campbell	9	6/19/19	Some parcels in Eastsound are categorized re-developable mixed use but they have existing residential development. Is this added capacity residential or commercial? How would the re-developed dwelling units be counted in the final capacity calculations?	<p>In mixed-use areas (type MU), it is presumed that re-developable properties will include a mix of commercial and residential. The calculations will provide three scenarios: 1) re-development with 100 percent residential, 2) re-development with 100 percent commercial, and 3) re-development with 50 percent of both residential and commercial.</p> <p>The third step in the LCA will provide information about development trends. This information will establish more context about what kind of development is likely to happen. The added context will inform what is reasonable to expect for a combination of residential and commercial uses.</p> <p>Existing dwelling units on parcels considered re-developable or partially used will be subtracted from the gross capacity. This is detailed on page 18 of the LCA Methodology. In this way, the final capacity calculations will account for the changes in housing capacity as parcels re-develop.</p>

Name	Comment Number ¹	Date	Summary of Comment	Staff Response
Fred Klein	10	6/19/19	<p>I. Capacity within the UGA should be examined to see how likely the potential development would be realized.</p> <p>II. The LCA results in the UGA should be considered within the context of what is likely to happen.</p> <p>III. If the capacity generated by the LCA is too inflated, the UGAs may not be appropriately sized to realize policy goals.</p> <p>IV. Historic development patterns must be considered with the LCA results.</p>	<p>I. The third step in the LCA Methodology will provide information about achieved development and summarize development trends (LCA Methodology pg. 15). This will help us understand how much development is likely; a deeper context than a raw count of how much development is possible.</p> <p>II. The third step of the LCA will provide the context of what is likely to happen within the UGA.</p> <p>III. Decisions about sizing the UGAs will necessarily consider the LCA results but the County will have some discretion in determining the UGA boundary in consideration of other reasonable market factors.</p> <p>IV. Historic development patterns will be provided in the third step of the LCA.</p>
JoAn Mann	15	6/28/19	<p>I. Ms. Mann suggests an extension of the comment period and LCA public workshop to gather additional comments on the GDLI map.</p> <p>II. Ms. Mann recommended a fillable comment form and paper copies of maps be made available for less computer-savvy members of the public.</p> <p>III. Ms. Mann requests an alternative comment process be made available, including a Countywide mailing of instructions for review and comment form to collect hand-written comments.</p> <p>IV. Ms. Mann suggests a deeper connection between the LCA and the Comp. Plan Vision.</p>	<p>I. An additional public workshop would dramatically expand the scope of the LCA project and delay the remainder of the process. Additional public workshops are planned for the update to the Comp. Plan goals and policies.</p> <p>II. Written comments are accepted, including hand-written letters and those submitted by mail. Copies of the maps for the ferry-served islands were provided with the June 5, 2019 staff report.</p> <p>III. A Countywide mailing and extended comment period would increase the scope of the LCA. Additional opportunities to comment on the Comp. Plan update will be available throughout the remainder of the process.</p> <p>IV. The Vision statement informs the Comp. Plan goals and policies. This connection will be strengthened throughout the update of those portions of the Comp. Plan.</p>

Notes

1. Comment numbers were assigned based on the order the comments were received. See Attachment B of this report for the complete comment.
2. Mr. Campbell submitted a letter attached to his email. This prompted a reply from Fred Klein in Comment 4. Staff forwarded this letter to Town of Friday Harbor Land Use Administrator, Mike Bertrand for his thoughts. Mr. Bertrand's reply is included in Comment 8.



SAN JUAN COUNTY DEPARTMENT OF COMMUNITY DEVELOPMENT

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MEMO

REPORT DATE: July 5, 2019
Meeting Date: July 9, 2019
TO: Eastsound Planning and Review Committee (EPRC)
FROM: Erika Shook, AICP, DCD Director
Linda Kuller, AICP, DCD Deputy Director *JK*
Adam Zack, Planner III *AZ*
SUBJECT: EPRC Land Capacity Analysis Questions
FOR MEETING OF: July 10, 2019
ATTACHMENTS: Email from EPRC Chair, Paul Kamin, dated July 1, 2019.

ISSUE: On July 1, 2019, EPRC Chair, Paul Kamin, sent the Department of Community Development (DCD) a list of questions about the Land Capacity Analysis (LCA) and draft Gross Developable Lands Inventory (GDLI) web map. Mr. Kamin included a list of parcels and comments from the EPRC review of the GDLI web map.

BACKGROUND: The Land Capacity Analysis (LCA) is a forecast of what development may be possible given existing development and current regulations. It helps us understand what is possible and what is likely to happen given those two factors. It does not provide a specific picture of what *will* happen parcel-by-parcel. If the capacity calculations say that 2,000 dwelling units are possible in the Rural Farm Forest (RFF) land use designation, that does not mean that all of those 2,000 dwelling units will be constructed. This would only mean that given the existing development and current regulations, 2,000 dwelling units might potentially be constructed.

It can be helpful to think of the LCA like a weather forecast. If I am packing for a camping trip this weekend and the weather forecast says it will not rain, I will still bring my rain jacket. I would do this because I know that there is still a possibility of rain based on my previous experiences having grown up camping in Western Washington. In other words, I can supplement the information in the weather forecast with what I know from other sources. The LCA is the weather forecast and the Comprehensive Plan policies and development regulations are the items that we pack based on the full-range of available information about what may happen.

There are many sources of information that will be considered during of the Comprehensive Plan update. The totality of this information will guide the later work on the Comprehensive Plan goals and policies. Some of the other sources of information that will be considered during the update are:

- Housing Needs Assessment (link below);
- Capital Facilities and Utilities inventories, including level-of-service analysis;
- Population Forecast, including seasonal population;
- Transportation Inventory, including a level-of-service analysis; and
- Public input, including written comments, community surveys, and Comprehensive Plan workshops.

Staff will also provide the County Council with additional information about the implications of any possible changes at the time that amendments are proposed. The LCA will function as one source of information among the many considered during the Comprehensive Plan update. We can make sure that we appropriately prepare for the coming years by considering all the information available.

EPRC QUESTIONS: The July 1, 2019, email from Mr. Kamin included eleven questions about the LCA. The EPRC questions are shown in bold below.

1.) Some of the parcels near the Eastsound UGA are shown as partially developed residential, but they have existing homes and should be fully developed.

A similar comment was made by Craig Gibson in a separate written comment. Staff reviewed this area and found that the script was not correctly calculating the density in the Eastsound Rural Residential (ERR) land use designation. In the data, ERR density was not a numeric value and the script did not translate it correctly. Staff fixed this issue in the script. The next draft of the GDLI will correctly categorize properties in this area.

2.) In village commercial, what ratio of commercial and residential development be assigned to mixed-use parcels?

The calculations of final capacity will assume the following in mixed-use areas:

- Capacity will account for three different scenarios:
 - Mixed-use districts develop with an even split (50 percent each) of commercial and residential;
 - Mixed-use districts develop with only commercial; and
 - Mixed-use districts develop with only residential.
- The calculations of the number of dwelling units will assume that each dwelling unit is 1,000 square feet. This assumption is used because commercial capacity is understood as building square footage. In order to calculate the number of dwelling units, a square-foot-per-dwelling assumption is required.

3.) In Village Commercial, the Land Capacity Analysis envisions all residential parcels moving towards mixed use (Commercial and Residential).

This statement is partially correct. The LCA assumes that as parcels in mixed-use districts (i.e. the Marina and Village Commercial land use designations) are re-developed, the re-development will include some combination of commercial and residential uses. This is signified on the map with the 'MU' category.

4.) Is any accommodation in the UGA's residential development being made for the potential loss of the existing residential density as properties are "encouraged" to be transitioned to commercial use?

During the final step of the LCA, existing dwelling units are subtracted from the final dwelling unit capacity. In commercial/industrial areas, this captures the reduced dwelling unit capacity as commercial/industrial zones are re-developed.

5.) "Vision for Eastsound" includes a strong mix of residential and commercial uses. A process that seeks to replace SFH uses in Village commercial would seem counter to that vision. How is the County plan going to include residential in Eastsound core?

The LCA looks at what could be developed based on existing development and current regulations. The LCA is not a process that seeks to replace any kind of development. Single-family residence (SFR) in mixed-use and commercial designations is a lower-intensity use than what is possible. This is not to say that either residential or commercial uses are preferred, only that a mix of both is allowed by the current regulations.

To evaluate what additional development may be possible given existing development and current regulations, parcels occupied by a SFR in mixed-use and commercial designations are not developed to the maximum amount possible. In other words, a parcel in Village Commercial (VC) that already has a SFR on it still has some amount of commercial capacity because the regulations allow a combination of commercial and residential uses.

The allowed and prohibited uses in the VC land use designation are provided in [SJCC 18.30.460 Eastsound subarea land use regulations](#). Single-family residences are allowed outright in the Village Commercial land use designation. Many other residential uses are allowed in VC. There is currently no proposal to change this aspect of the Eastsound Subarea Plan. The regulations, which implement the Eastsound Subarea Plan, provide for a mix of residential and commercial uses in the VC land use designation.

6.) A significant number of recent new residential developments have quickly been converted to vacation rentals. Is there a plan to incorporate the significant number of Vacation Rental permits into estimates of future housing?

The LCA is one of several analyses that will be considered during the Comprehensive Plan Update. The affects of vacation rental permits on the supply of housing is included in the Housing Needs Assessment (HNA). The HNA is available here: <https://www.sanjuanco.com/DocumentCenter/View/18231>

7.) How will the significant number of new residential developments that are being used/built as second home impact projections of future available residential housing?

The market and seasonal home factors are deducted during the calculations of 'final capacity', step five of the *Land Capacity Analysis Methodology* (LCA Methodology). The LCA Methodology deducts a market factor of 25 percent and a seasonal home factor of 35 percent. This means that the final residential capacity is reduced by 60 percent to account for market and seasonal home factors. In other words, though all partially used, vacant, and sub-dividable residential parcels may have gross capacity for additional dwelling units, the LCA Methodology assumes that sixty percent will not contribute to the overall housing stock because they are being speculatively held out of the market or used for seasonal/vacation homes.

8.) How will you integrate the new development that has occurred since 2017 into the future projections?

The LCA is using a 'snapshot' of parcel data from March 3, 2017. The 'snapshot' provides a static data set for the LCA calculations. Some development that has occurred after the 2017 'snapshot' will be summarized in the third step of the LCA. This step includes a summary of development trends based on permit and other data.

It is important to note that the LCA is a study of what might be possible in the future. It is a generalization about what existing development is out there and how the regulations may affect additional development. Given the LCA is a general projection, the specificity of \pm the development permitted after the 'snapshot' is more granular than the broad picture the LCA provides.

9.) There does not appear to be a minimum lot size in village commercial. Is that an oversight? Should there be in order to maximize future development density?

SJCC 18.30.470 Eastsound village commercial district does not include a minimum lot size. Adding a minimum lot size can be considered in a different process than the LCA. The LCA will help us understand the implication of existing development and current regulations on the possible future development.

10.) How does airport overlay district impact development potential of David McPeak's lot between christian school and fire department?

The Gross Developable Lands Inventory (GDLI) web map is for planning purposes only. It cannot be used for permitting or evaluation of site-specific development proposals. This analysis does not determine whether a specific development is or is not allowed.

The LCA Methodology does not specifically reduce capacity for the Eastsound Airport Overlay. This is because most of the overlay does not include explicit prohibitions on development but rather, includes particular conditions that apply to development within the overlay. The kind of development may be influenced by the overlay, but the overall capacity is not necessarily reduced.

The airport overlay includes specific parameters on how development may or may not occur depending on the zone within the overlay. These parameters are defined by several sections of Title 18 SJCC. Specifics of what would be allowed will vary depending on the proposed development. Discussion of what would be allowed on a site-specific basis should be conducted through the options provided below.

- Critical Area and Archaeology Map Review – this checklist provides information on what critical area reports may be required
- Ask-A-Planner Form – this form can be used for general questions about how the development code applies on a specific property.
- Pre-Application Meeting – a meeting between County staff and the property owner to discuss the permitting requirements for a specific proposal. These meetings help property owners understand what their applications must include based on what they are proposing.
- Residential Pre-Application – includes a site-visit from County staff and a written report documenting the site-specific regulatory details for a specific project (i.e. nonconformity and shoreline setbacks).

More information on all of these options can be found here: <https://www.sanjuanco.com/1301/Pre-Application-Assistance>

11.) Is there flexibility in the Land Analysis to change building/land ratio to give value to thriving businesses?

Reducing the possible capacity on a given parcel because the business is thriving would be counter to the intention of the analysis. A thriving business may eventually look to replace or expand their facilities as the business continues to grow. This would be additional commercial/industrial space. The building to land value ratio helps to capture this.

For example, the EPRC provided table of parcels for review included the Lower Tavern's parcel as a 'thriving business'. If the business continues to thrive and decides to expand their building, this would add to the inventory of commercial building square footage, the expansion (re-development) would be additional commercial capacity. The LCA is simply saying that this kind of development is possible.

The assigned categories and types are value-neutral. They are not an expression of what *should* be re-developed. Rather, the categories and types describe what *could* be re-developed under the current level of development and existing regulations.

NEXT STEPS: The GDLI is the first step of the LCA. The entire LCA process is detailed in the LCA Methodology. The draft LCA Methodology was provided with a June 5, 2019, staff report (<https://www.sanjuanco.com/DocumentCenter/View/18555>). Staff is working on updating the draft GDLI to account for the public comments received and completing the remaining steps of the LCA. This work will be ongoing throughout the month of July. The Planning Commission and County Council will be briefed in August or September 2019, once staff has completed the remaining steps. The EPRC and the public will have the opportunity to provide additional comments once the remaining steps of the analysis and the first draft of the results are available.

Adam Zack

From: Erika Shook
Sent: Monday, July 1, 2019 9:38 AM
To: Comp Plan Update
Subject: FW: EPRC Land Capacity Analysis COMMENTS.xlsx
Attachments: EPRC Land Capacity Analysis COMMENTS.pdf

From: Paul Kamin EWUA <pkamin@rockisland.com>
Sent: Monday, July 1, 2019 9:34 AM
To: Brian Wiese <brian_wiese@outlook.com>; Kangaroo House B&B <innkeeper@kangaroohouse.com>; Terry Gillespie <terrywg57@gmail.com>; Leith Templin <leithtemplin@hotmail.com>; joAn Mann <jo.an.a.mann@gmail.com>
Cc: Erika Shook <erikas@sanjuanco.com>; Rick Hughes <rickh@sanjuanco.com>; John Campbell <jmc779@rockisland.com>
Subject: EPRC Land Capacity Analysis COMMENTS.xlsx

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.

EPRC Members,

Attached is the latest version of our Land Use Analysis comments. This reflects our 3 “work group” meetings, the last been Friday’s.

We have not other meetings planned prior to our “monthly” July meeting which is planned for Tuesday the 9th.

I have included my best effort at including the “special questions” that came up during our work group sessions.

I want to thank John Campbell for joining in and adding his perspective to our efforts.

In the Spirit of Service,

Paul Kamin
General Manager
Eastsound Water Users Association
360 376 2127
pkamin@rockisland.com

EPRC Land Capacity Analysis COMMENTS

Pkamin/EPRC

Revised 7/1/19

Reference LINE #	Parcel#	Common Name	Address	SJC Designation	EPRC Proposal	Comments
1	271553208000	Trading Post	488 Prune	4 MU	0 R	fully developed, historically residential
2	271414013000	Roses Café	382 Prune	2 MU	0 MU	Rose's occupies two adjacent parcels, both fully developed
3	271414014000	Hennigson	N of library park	2 MU	2 P	Owner intent is to preserve as part of park.
4	271455108000	Budnick	176 Prune	4 MU	0 MU	Property Value and owners unlikely to support redevelopment
5	271455106000	Island Market Parking		2 MU	0 MU	Existing parking required to support Market, thus lot not available for future development
6	271455104000	Island Market Parking		2 MU	0 MU	Existing parking required to support Market, thus lot not available for future development
7	271455101000	CenturyLink	423 Main	0 CL	0 P	CenturyLink is UTILITY vs Commercial lot fully developed.
8	271455102000	Lower Tavern	46 Prune	4 MU	0 MU	Tavern is successful business, hard to imagine lot being redeveloped
9	271455205000	Templin's Parking Lot		2 MU	0 MU	Existing Parking required for Templin's thus lot not available for new development
10	271455205000	Kitchen/Barnicle	238 N. Beach	4 MU	0 MU	Building value inaccurate following recent improvements, decks, kitchen,bath, barnicle.....
11	271414020000	Crawford	432 N. Beach	0 CL		Two lots linked due to parking requirements.
12	271452204000	Crawford	433 N. Beach	2 MU	4 MU	Combined valve of both lots meets "redevelopable bldg/lot equation. (long standing vacancy also suggests redevelopable designation)

13	271452207000	Woodward	474 N Beach	0 R	0 MU	current use includes both commercial and residential.
14	271453101000	Aldort	497 Pine	2 MU	4 MU	Current use is multi family residential, even though building value is low.
15	271453102000	Aldort	485 Pine	2 MU	4 MU	Current use is multi family residential, even though building value is low.
16	271453103000	Aldort	469 Pine	2 MU	4 MU	Current use is multi family residential, even though building value is low.
17	271453106000	Jewell	463 Rose	4 MU	0 R	New Manufactured home, unlikely to be redeveloped anytime soon.
18	271453201000	Cable Comp.	School and Pine	2 MU	4 MU	Utility designation? Certainly redevelopable, but not vacant.
19	271454105000	Islanders Bank	Fern St	0 CL	0 MU	This lot is bank parking, not fully developed, but neither is it redevelopable.
20	27145410600	Islanders Bank	475 fern	2 MU	0 MU	Islanders Bank Building, not vacant
21	271454205000	Islanders Bank	475 fern	2 MU	0 MU	Islanders Bank Building, not vacant
22	271453303000	M Williams	451 Madrona	4 MU	0 R	Permitted for addition of 2nd living unit, will change value ratio
23	271453306000	S Mustard	411 Madrona	4 MU	0 MU	Relatively new Mixed commercial/residential construction, hard to imagine redevelopment
24	271454305000	Andrew	261 Madrona	0 CL	0 MU	currently residential rental, former commercial
25	271441004000	Island Market		0 CL		Recent BLM added aprox. .33 acre parcel abutting Fern, certainly purchased for some form of additional development.
26	271453401000	Madrona Manor	480 Madrona	4 MU	0 R	Relatively new residential building, unlikely to be redeveloped in 20 yr horizon

27	271453403000	Orr	452 Madrona	4 MU	0 R	Existing residence, barely meets redevelopment value ratio
28	271453404000	Arbutus	434 Madrona	0 CL	0 MU	Existing residential and commercial tenants
29	271453407001	OPAL	432 Madrona	4 MU	0 R	OPAL homeowner lease precludes redevelopment, must remain affordable housing.
30	271453408001	OPAL	433 Madrona	4 MU	0 R	
31	271460032000	Wulff		2 MU	0 MU	Required Parking for 596 Main
32	271460033000	Wulff		2 MU	0 MU	Required road access for 596 Main
33	271460052000	Gudgell		4 MU		Limited redevelopment potential. Parking required for other developments.
34	271460075000	Gudgell		2 MU		Limited redevelopment potential. Parking required for other developments.
35	271451011000	Pawki/ Nelson	199 Main	4 MU	4 MU	significant Wetland limitations impact future development potential
36	271451008000	Landmark		2 R	0 MU	Landmark more hotel than residential, either way fully developed.
37	271413024000	Cohen	south of Athletic Center	2 MU		Athletic Center Geo Thermal infrastructure on property limits future development potential
38	271412013000	Port of Orcas	N of saw shop	2 CL	2 P	Port property, runway flyover/wetlands/FAA funding preclude SLI development.
39	271412009000	Port of Orcas		2 CL	2 P	Port property, runway flyover/wetlands/FAA funding preclude SLI development.
40	271412010000	Port of Orcas		2 CL	2 P	Port property, runway flyover/wetlands/FAA funding preclude SLI development.

41	271322001000	Cemetery		3 R	2 P	Cemetery, can't be developed
42	271142017000	Sewer District	Cesena	2 CL	0 P	District is Utility
43	271142023000	Port of Orcas	West of Runway	2 CL	0 P	Public land, port owned, wetland incumbered, FAA funding allows only port related uses. Tree mitigation
44	271142023000	Port of Orcas				parcel does not show up on polaris?
45	271142014000	Griot/Smallwood		0 CL	4 CL	rare Underdeveloped SLI parcel.
46	271461026000	Opal EWUA	286 Enchanted	3 R	0 MU	Fully developed with offices, and apartments.
47	West of Blanchard	Los Arbolos		1 R	0 R or 4 R	Eastsound Rural Residential 1 unit per 5 acre, NONE OF THESE LOTS ARE SUBDIVIDABLE
48	271141002000	Otten	End of Autumr	1 R	1 R or 4 R	Eastsound Rural 1 unit per 5 acres NOT Subdividable.
49	271158003000	Hanger Sites?		2 CL		Location inside port fence limits uses?
50	271158005000	Hanger Sites?		2 CL		Location inside port fence limits uses?
51	271158004000	Hanger Sites?		2 CL		Location inside port fence limits uses?
52	271158011000	Propone Site	Seaview/Aero view	0 - P	3 CL	Is propane delivery a utility? San Juan Propane not designated as such?
53	271413008000	2nd Star parking	A St.	2 MU	0 MU	parcel only parking spaces in support of lindholm real estate building.
54	271413012000	Seaview Theater	234 A St.	0 CL	4 MU	theater building over valued by assessor, lot highly redevelopable, business just hanging on.

55	271413015000	Zukin/Duke	215 A St	2 MU	2 MU	2 MU	significant wetlands impacts development potential
56	271413024000	Cohen		2 MU	2 MU	2 MU	Athletic Center geo-thermal on lot impacts development potential.
57	271451006000	LeRoy	45 Main. St	2 R	2 MU	2 MU	Believe property is in expanded Village commercial not former village residential
58	271451008000	Landmark Inn	Main St	2 R	0 MU	0 MU	Landmark has 16 units on it, and now in village commercial.
59	271449051000	Landmark Inn	Main St				Landmark parking unlikely redevelopable.
60	271451011000	Pawki's	199 Main St	4 MU	4 MU	4 MU	Significant wetlands impacts development potential
61	271460052000	Steward Blackington	460 Main ST	2 MU	2 MU	2 MU	Lot incumberd by parking that supports development on other parcels
62	271460075000	fishing Bay	Haven	2 MU	2 MU	2 MU	Lot incumberd by parking that supports development on other parcels
63	271460061000	Wild Island	Urner St				Land use maps shows 2 parcels, polaris shows just one.?
64	271460074000	GlenHari Group	155 Harrison Pt	0 R	4 R	4 R	larger parcel, 12 units per acre potential, only one older house currently, seems like it has high redevelopment potential?
65	271353001000	Land Bank	Crescent Beach	2 R	2 P	2 P	Land Bank owned Should be Public
66	271113005000	Brandt's Landing		0 P	1 CL	1 CL	privately owned marina, significant development potential remains
67	27141201100	Segault	Enchanted Forest	3 R	0 R	0 R	Wetlands severely limit development
68	271412012000	OPAL	Lavender Hollow	1 R	0 R	0 R	22 units, no room for more development
69	271142004000	Toxey	Kangaroo House	0 CL	1 CL	1 CL	owner intents significant additional development
70	271233001000	3 Bad Bitches Farm	Mt Baker Farm	3 R	3 R	3 R	ratio of allowable use seem incorrect. Should be .39 not .02?

71	271343005000	Doorison	Olga Rd	1 R	0 R	Lot less than 2 acres, within Land Use Designation w/ min. 2 acres sizes. How does it have additional development potential?
72	271343006000	Salty Cove	Olga Rd	1 R	0 R	Lot less than 2 acres, within Land Use Designation w/ min. 2 acres sizes. How does it have additional development potential?
73	271350016000	Carpenter/Harlov	The Barn	0 CL	1 CL	Property has additional development potential give lot size.
	74 271461026000	OPAL	Redick Office	3 R	0 R	fully developed office and residential wetlands severely limits additional development on adjacent lots.

Parcels such as this one are outside the UGA, thus min. lot size is 5 acres. How do these lots have additional development potential?

LCA list as 1 R (further subdiviable or developed)

UGA Boundary

This map is of Terri Ln, Michael Ln, and Timber Lane. The same concern applies to properties in View Haven, Sunset, Scenic, Echo and Fossil Bay, and Olga Rd.. "Script" may not properly factor UGA boundaries or Land Use Designation min. lot size?

EPRC Questions for July 9 Meeting w/ Erika

In village commercial, what ratio of commercial and residential development be assigned to mixed use parcels?

In village commercial the Land Use Analysis evisions all residential parcels moving towards mixed use (Commercial and Residential).

Is any accomdation in the UGA's residential development being made for the potential loss of the existing residential density as properties are "encouraged" to be transitioned to commerical use.

"vision for eastsound" includes a strong mix of residential and commerical uses. A process that seeks to replace SFH uses in Vllage commercial would seem counter to that vision. How is county plan going to include residential in eastsound core?

A significant number of recent new residential developments have quickly been converted to vacation rentals.

DeMerritt on Prune

3 out of 4 in vacation rental

Adele

5 out of 6 not residential use

Campbell Miller on Haven

multiple units being converted to VR before construction is complete

Is there a plan to incorporate the significant number of Vacation Rental permits into estimates of future housing

How will the significant number of new residential developments that are being used built as second home impact projections of future available residential housing/

How will you integrate the new development that has occurred since 2017 into the future projections?

There does not appear to be a minimum lot size in village commercial. It that an oversight? Should there be in order to maximize future development density?

How does airport overlay district impact development potential of David McPeak's lot between christian school and fire department?

Is there flexibility in the Land Alalysis to change building/land ratio to give value to thriving buisnesses?

COMPREHENSIVE PLAN

Appendix 1

LAND CAPACITY ANALYSIS METHODOLOGY

~~October 11, 2017~~

May 23, 2019

DRAFT

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1 **1.0 Introduction**

2
3
4 San Juan County’s 2036 Comprehensive Plan update process includes a Land Capacity Analysis
5 (LCA). The Land Capacity Analysis methodology is described in this document.

6
7 The Growth Management Act (GMA) allows counties to exercise discretion in their
8 Comprehensive Plans and to make choices on how they plan to accommodate growth over the
9 twenty-year planning horizon.

10
11 Conducting a Land Capacity Analysis is an important Step in determining how and what growth
12 can be accommodated through the year 2036. The Washington State Department of
13 Commerce (Commerce), indicates that the Land Capacity Analysis methodology is used to
14 determine:

- 15
- 16 ▪ The amount of vacant, partially-used, under-utilized lands, and redevelopment
17 potential of built properties needed to accommodate growth, and
- 18
- 19 ▪ If the existing or potential Urban Growth Areas (UGA’s) can accommodate
20 twenty years of urban growth.
- 21

22 The Land Capacity Analysis will help determine if the County’s land supply aligns with the 2036
23 population growth projection of 19,423. The primary purpose of the Land Capacity Analysis is
24 to determine the capacity of Urban Growth Areas for balancing urban development with
25 adequate and cost-efficient urban services. However, because the majority of development in
26 San Juan County occurs outside of the Urban Growth Areas, the Land Capacity Analysis will help
27 the County evaluate the development potential of rural and natural resource lands.

28
29 The Land Capacity Analysis is also used to determine whether the County will have sufficient
30 developable land to meet the Growth Management Act housing goal. This goal encourages the
31 availability of affordable housing to all economic segments of the population, promotes a
32 variety of residential densities and housing types and encourages preservation of existing
33 housing stock (RCW 36.70A.020(4)).

34
35 This report defines terms, provides a high level overview of the Land Capacity Analysis
36 methodology and details the Steps and assumptions of the Land capacity Analysis. It identifies
37 deliverables of the various Steps of the analysis and documentation of the necessary
38 calculations through the use of GIS maps, metadata, and Excel tables.

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2.0 TERMS.

The following terms are used in this methodology:

Vacant means property with minimal or no building improvements.

Re-developable means a parcel that has a land use designation that allows uses that would be more intensive than an existing use (e.g. a single family home on a parcel with a commercial land use designation).

Partially-used means residential property occupied by a use allowed by its land use designation which contains enough land to be further subdivided or developed (e.g. a single-family home on a very large lot).

Fully developed means property that is assumed to have no further development capacity.

Floor Area Ratio (FAR) means the total building square footage divided by total lot square footage.

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3.0 Methodology Overview

The bullets below provide a high level overview of the Land capacity Analysis methodology:

A. Prepare the Land Capacity Analysis County Land Base and Develop a Gross Developable Land Inventory (GDLI) and GIS Map Layers

Assessing land supply begins with the identification of all parcels within the County that are fully developed, vacant, partially-used, re-developable, or public, utility & conservation. The **Gross Developable Land Inventory** includes parcels which are vacant, partially used or re-developable and are potential candidates to accommodate future growth. This parcel based inventory is based upon the Assessor’s land use codes and data from March 3, 2017, the most current information.

All parcels are categorized. Two map layers (GIS shapefiles) are produced:

- The first layer categorizes all parcels as fully developed, public/conservation, vacant, partially-used, or re-developable. This layer is the **Land Capacity Analysis Land Base**.
- The second layer identifies all parcels categorized as vacant, partially used or re-developable and are assumed to have further development capacity.

The second map layer of potentially developable land is the **Gross Developable Land Inventory**.

B. Prepare an Inventory of Net Developable Land for Residential and Commercial, Industrial and Mixed-use Lands

The net developable land inventory is determined by deducting areas with reduced development potential such as critical areas and their buffers from the Gross Developable Land Inventory.

$$\begin{array}{l}
 \text{Gross Developable Land Inventory} \\
 - \text{ Critical areas, buffers and other undevelopable areas } \\
 = \text{ Net Developable Land}
 \end{array}$$

Deliverables: Two map layers (GIS shapefiles):

- The first layer depicts the net developable residential land.
- The second layer depicts the net developable Commercial, Industrial and Mixed-Use land.

These layers show the land expected to be available to accommodate future growth before other deductions are made. This information is provided by island, UGA’s, and land use designations.

1 **C. Calculate Existing Floor Area Ratios, Summarize Development Trends,**
2 **Assign Assumed Densities and FAR, and Calculate Pending Development**
3 **Capacity.**
4

5 This section provides analysis of past development trends in order to provide a basis for
6 estimating future development capacity; to determine if development is occurring
7 consistent with Comprehensive Plan densities; and to calculate pending development.
8 The information gathered in this Step will be used in the capacity calculations. This Step
9 will:

- 10 ▪ Analyze recent development history, achieved densities and assign assumed
11 densities;
- 12 ▪ Provide data necessary to convert available land into capacity in terms of dwelling
13 and square feet of building on each parcel; and
- 14 ▪ Calculate pending development capacity.

15
16 **D. Calculate and Map Gross Housing and Development Capacity**
17

18 The Net Developable Land Inventory (in acres) is converted into capacity for housing units
19 for residential land and building square feet for commercial, industrial, and mixed-use
20 land. This work is conducted in GIS and Excel. This results in tables and GIS map layers
21 showing capacity by parcel. The purpose of this exercise is to graphically display capacity
22 at the parcel level.
23

24 The capacity calculated in this Step will not be the final capacity because it is not
25 converted to population and does not include deductions for public uses, market
26 factors, and seasonal/recreational home factors.
27

28 Deliverables:

- 29
30 ▪ Net Developable Land Inventory maps for residential land – categorized into
31 housing capacity ranges (dwelling units), and
32
- 33 ▪ Net Developable Land Inventory maps for commercial, industrial and mixed use
34 lands – categorized into building capacity ranges (square feet).
35
- 36 ▪ Excel tables of the Preliminary Housing and Development Capacity calculations
37 summarized by island, land use designation, and urban growth areas.
38

39 **E. Calculate Final Housing and Development Capacity**
40

41 The summary tables of the preliminary housing and development capacity calculations
42 created in the previous Step are the basis of the **Final Capacity Calculations**. Public use,
43 market and seasonal/recreational home factors are deducted from the preliminary
44 housing and development capacity. After these deductions, the following are calculated:
45

- 46 - **Total Occupied Housing Units by Land Use Designation**
- 47 - **Total Population Capacity**
- 48 - **Employment Capacity** (square feet of building)

1
2 **4.0 Land Capacity Analysis (LCA) Methodology**

3
4 **Prepare the Land Capacity Analysis County Land Base and Gross Developable**
5 **Land Inventory**

6
7 Assessing land supply begins with the categorizing of all parcels within the County as fully
8 developed, vacant, partially used, and re-developable, or public, utility, and conservation as
9 identified in Table 1. This results in the **Land Capacity Analysis Parcel Base** GIS layer. The subset
10 of this layer consisting of all vacant, partially-used and re-developable parcels is the **Gross**
11 **Developable Land Inventory**. The Gross Developable Land Inventory is calculated by deducting
12 all parcels categorized as fully developed from the Land Capacity Analysis Parcel Base.

- 13
14 LCA Parcel Base
15 - Fully developed parcels
16 - Public, utility and conservation parcels
17 = Gross Developable Land Inventory

18
19 The San Juan County Assessor's county-wide parcel data in shapefile format and the associated
20 attribute data including improvement value and land value from March 3, 2017 (the latest data
21 update) is used.

22
23 Parcels with structures existing on March 3, 2017 are considered developed. Structures
24 proposed, built, or occupied after that date are counted in future capacity calculations.

25
26 GIS shapefiles for each island, Lopez Village and Eastsound UGA's, the Town of Friday Harbor,
27 and all of the County land use designations are used.

28
29 Steps

30
31 **A.1.** Create a GIS layer that consists of all county parcels and includes fields for area, assessor
32 land use code, assessed value of improvements, land use designation, Comprehensive
33 Plan density and Land Capacity Analysis category.

34
35 **A.2.** Consistent with the assumptions in *Table 1. Gross Developable Land Inventory:*
36 *Thresholds and Assumptions* and using the Assessor's land use codes and
37 Comprehensive Plan land use designations categorize each parcel as:

- 38
39
 - Fully developed residential;
 - Fully developed industrial, commercial or institutional;
 - Fully developed mixed-use;
 - Public and conservation lands;
 - Vacant and subdividable residential;
 - Vacant non-subdividable residential;
 - Partially-used residential;
 - Vacant industrial or commercial;
 - Vacant mixed-use;

- Re-developable industrial or commercial; or
- Re-developable mixed-use.

A.3 All parcels categorized as fully developed or public/conservation lands are deducted from the LCA Land Base. The result of this initial cut is a collection of all the parcels in the County that are vacant, partially-used or re-developable. This is the **Gross Developable Land Inventory**. The Gross Developable Land Inventory is the base from which additional acreage is deducted to account for various physical and regulatory constraints on future development.

Gross Developable Land Inventory = GIS layer of all parcels that are not fully developed.

This map layer depicts categories of the County’s parcels and includes fields for land use and density designation, the Assessor’ land use codes, improvement value, and land area.

Table 1. LCA Categories: Thresholds and Assumptions

	LCA CATEGORY	DEFINITION	THRESHOLDS /ASSUMPTIONS
A.	<p>Fully Developed Residential (No further development potential)</p> <p><u>GIS Data Category 0</u> <u>GIS data type: R</u></p>	<p><u>Land Use Designations</u></p> <p>Agricultural Resource (AG) Forest Resource (FOR) Conservancy (C), Rural Residential (RR), Rural Farm Forest (RFF) Village Residential (VR), Hamlet Residential, (HR), Lopez Village Residential (LVR) Eastsound Residential (ER) Eastsound Rural Residential (ERR) Eastsound Rural (ER*) Village Residential/Institutional (VR/I) Olga Hamlet Residential (OHR) Deer Harbor Hamlet Residential (DHHR) Orcas Village Residential (OVR)</p>	<p>Parcels in these land use designations are considered fully developed if the following criteria apply:</p> <p>a. The assessed improvement value is \geq <u>\$10,000</u> <u>\$42,000</u>; and</p> <p>b. The ratio of allowed density to parcel size is > 0.5; <u>or</u></p> <p>c. Site developed with multi-family use (Assessor code 1200-1300) in any designation and the building to land value (BV/L ratio) is >1.0</p>
B.	<p>Fully Developed Industrial, Commercial (No further development potential)</p> <p><u>GIS data Category 0</u> <u>GIS data type: CI</u></p>	<p><u>Assessor’s land use codes</u></p> <p>1400-1488 Accommodations 1600 Hotels/motels 1700 Institutional lodging 2100 Food and kindred products 2200 Textile Mill Products 2400-2403: Lumber/wood products 2500: Furniture/fixtures 2600: Paper and Allied products 2700: Printing and publishing 2800: Chemicals 2900: Petroleum refining / related 3100: Rubber misc. plastic products 3200: Stone, clay and glass 3300: Primary metal industries 3400: Fabricated metal products 3500: Prof. & Scientific Instruments</p>	<p>Parcels in these Assessor’s codes are fully developed if the following criteria apply:</p> <p>a. The site is developed with existing industrial, commercial or non-residential use per the Assessor’s codes; <u>and</u></p> <p>b. The ratio of building value to land value (BV/L ratio) is >1.0; <u>or</u></p> <p>c. Existing development, such as gas stations, quarries or uses preclude significant additional development on the site, regardless of BV/L ratio.</p>

	LCA CATEGORY	DEFINITION	THRESHOLDS /ASSUMPTIONS
		3900: Misc. Manufacturing 4100: Railroad and Transit 4200: Motor vehicle transportation 4300: Aircraft transportation 4400: Marine transportation 4600: Automobile parking 4700 Communications 4900: Other transportation 5000: Non-residential condos 5100: Wholesale trade 5200: Building & hardware & farm 5300-5320: General merchandise 5400-5403: Retail food 5500-5503: Retail-auto, marine, aircraft 5600: Apparel 5700-5708: Retail furniture and home furnishings 5800: Retail- Eating and drinking 5900: Other retail 6100: Finance, insurance & real estate 6200-6220: Personal services 6300: Business services 6400-6402: Repair services 6500-6503: Professional services 6600 Contract construct. services 6900-6902 Miscellaneous services 7100: Cultural activities 7200-7202: Public assembly 7300: Amusements 7400-7420: Recreational activities 7500: Resorts and group camps 7900: Other recreational 8100-8328: Agriculture 8400: Fishing and related services 8500: Mining activities 8600: Marijuana grow operation 8900: Other resource production	

	LCA CATEGORY	DEFINITION	THRESHOLDS /ASSUMPTIONS
C.	<p>Public, Utility & Conservation (No further development potential)</p> <p><u>GIS Data Category 0</u> <u>GIS data type: P</u></p>	<p><u>Assessors Land Use Codes:</u> 7600: Parks 4800-4820: Utilities 6800-6820: Educational services 6700-6793: Governmental services 9240 9420: Open space with conservation easement 9243 9423: Open Space with conservation easement and dock 9520: Current Use Timber land with a conservation easement 8120: Agriculture with Conservation Easement 4500: Highway right-of-way 7400-7420: Recreational activities 8800-8820: Designated forest land <u>9900-9920 – Platted Common Area or Access</u></p> <p><u>Land Use Designations</u> <u>Natural (N)</u> <u>Eastsound Natural (EN)</u> <u>Olga Community Center (OCC)</u> <u>Hamlet Park (HP)</u></p>	<p>Parcels are considered fully developed public, utility and conservation lands if the following criteria apply:</p> <ol style="list-style-type: none"> Properties with land uses listed by the Assessor’s codes as Public, Utility and Conservation; <u>or</u> The parcel is on the GIS layers of public lands and County Parks and Open Space; <u>or</u> <u>Existing public, utility and conservation developments preclude future development (i.e. cemeteries, public water system properties)</u>
D.	<p>Vacant and Sub-dividable Residential</p> <p><u>GIS Data Category 3</u> <u>GIS data type: R</u></p>	<p><u>Land Use Designations</u> Agricultural Resource (AG) Forest Resource (FOR) Conservancy (C) Rural Residential (RR) Rural Farm Forest (RFF) Village Residential (VR) Hamlet Residential, (HR) Lopez Village Residential (LVR) Eastsound Residential (ER) Eastsound Rural Residential (ERR) Eastsound Rural (ER*) Village Residential/Institutional (VR/I) Olga Hamlet Residential (OHR) Deer Harbor Hamlet Residential Orcas Village Residential (OVR)</p> <p>*With several densities</p>	<p>Parcels in these land use designations will be considered vacant and sub-dividable if they meet the following criteria:</p> <ol style="list-style-type: none"> The assessed improvement value is < \$10,000 <u>\$42,000</u>; <u>and</u> The ratio of allowed density to parcel size is ≤ 0.5.

	LCA CATEGORY	DEFINITION	THRESHOLDS /ASSUMPTIONS
E.	<p>Vacant Non-Subdividable Residential</p> <p><u>GIS Data Category 2</u> <u>GIS data type: R</u></p>	<p><u>Land Use Designations:</u> Agricultural Resource (AG) Forest Resource (FOR) Conservancy (C) Rural Residential (RR), Rural Farm Forest (RFF) Village Residential (VR) Hamlet Residential, (HR) Lopez Village Residential (LVR) Eastsound Residential (ER) Eastsound Rural Residential (ERR) Eastsound Rural (ER*) Village Res./Institutional (VR/I) Olga Hamlet Residential (OHR), Deer Harbor Hamlet Residential (DHHR) Orcas Village Residential (OVR)</p> <p>*With several densities</p>	<p>Parcels in these land use designations will be considered vacant but not subdividable if they meet the following criteria:</p> <p>a. The assessed improvement value is < \$10,000 <u>\$42,000</u>; and</p> <p>b. The ratio of allowed density to parcel size is > 0.5.</p>
F.	<p>Partially-Used Residential</p> <p><u>GIS Data Category 1</u> <u>GIS data type: R</u></p>	<p><u>Land Use Designations</u> Agricultural Resource (AG) Forest Resource (FOR) Conservancy (C) Rural Residential (RR) Rural Farm Forest (RFF) Village Residential (VR) Hamlet Residential, (HR) Lopez Village Residential (LVR) Eastsound Residential (ER) Eastsound Rural Residential (ERR) Eastsound Rural(ER*) Village Residential/Institutional (VR/I) Olga Hamlet Residential (OHR) Deer Harbor Hamlet Residential (DHHR) Orcas Village Residential (OVR)</p> <p>*With several densities</p>	<p>Parcels in these land use designations are considered partially-used if they meet the following criteria:</p> <p>a. The assessed improvement value ≥ \$10,000 <u>\$42,000</u>; and</p> <p>b. The ratio of allowed density to parcel size is ≤ 0.5.</p>

	LCA CATEGORY	DEFINITION	THRESHOLDS /ASSUMPTIONS
G.	Vacant Industrial and Commercial <u>GIS Data Category 2</u> <u>GIS data type: CI</u>	<u>Land Use Designations:</u> Rural Industrial (RI) Island Center(IC) Rural Commercial (RC) Orcas Village Transportation (OVT) Orcas Village Commercial (OVC) Rural General Use (RGU), Village Commercial (VC) Village Industrial (VI) Hamlet Commercial (HC) Hamlet Industrial (HI) Service Light Industrial (SLI) Service Park (SP) Country Corner Commercial (CCC) Eastsound Marina (EM M) Eastsound Airport (EAD) Olga Hamlet Commercial (OHC), Olga Hamlet Community Cntr. (OHCC) Deer Harbor Commercial (DHC) Deer Harbor Industrial (DHI)	Parcels in these land use designations are considered vacant if the: Assessed improvement value is < \$10,000 <u>\$42,000</u> .
H.	Vacant Mixed-Use <u>GIS Data Category 2</u> <u>GIS data type: MU</u>	Eastsound Village Commercial (EVC) Lopez Village Commercial (LVC)- <u>Urban Growth Area (LUGA)</u>	Parcels in these land use designations are considered vacant if the assessed improvement value is < \$10,000 <u>\$42,000</u> .
I.	Re-Developable Industrial and Commercial An assumption is that existing use may be demolished and new project developed over the planning period. <u>GIS Data Category 4</u> <u>GIS data type: CI</u>	Industrial, Commercial, Institutional Rural Industrial (RI) Island Center(IC) Rural Commercial (RC) Orcas Village Transportation (OVT) Orcas Village Commercial (OVC) Rural General Use (RGU), Village Commercial (VC) Village Industrial (VI) Hamlet Commercial (HC) Hamlet Industrial (HI) Service Light Industrial (SLI) Service Park (SP) Country Corner Commercial (CCC) Eastsound Marina (EM M) Eastsound Airport (EAD) Olga Hamlet Commercial (OHC), Olga Hamlet Community Cntr. (OHCC) Deer Harbor Commercial (DHC) Deer Harbor Industrial (DHI)	Parcels in these land use designations are considered re-developable if they meet the following criteria: a. The ratio of building value to land value is ≤ 1.0 ; <u>or</u> b. They are occupied by a single family residence (Assessor's codes 1100-1199).
J.	Re-Developable Mixed-Use <u>GIS Data Category 4</u> <u>GIS data type: MU</u>	Eastsound Village Commercial (EVC) Lopez Village Commercial (LVC)	Parcels in these land use designations are considered re-developable if one of the following conditions are met: a. The ratio of building value to land value is ≤ 1 . <u>or</u> b. The parcel is occupied by a single family residence. (Assessor's codes 1100-1199).

B. Prepare an Inventory of Net Developable Land

The **Net Developable Land Inventories** are obtained by deducting critical areas, buffers, and other areas with reduced development potential from the **Gross Developable Land Inventory**.

- Gross Developable Land Inventory
- Critical Areas and areas with reduced development potential (Residential)
- = **Residential Net Developable Land Inventory**

- Gross Developable Land Inventory
- Critical areas, buffers and areas w/reduced development potential (Commercial, Industrial)
- = **Commercial, Industrial and Mixed-Use Land Inventory**

There are two layers because different deductions from the **Gross Developable Land Inventory** will be taken to create each layer based on the following assumptions:

Critical area buffers will not affect future capacity on residential parcels and are not deducted because the San Juan County development regulations allow for reasonable use exceptions and flexible development of residential properties with critical areas on them.

Critical area buffers are not be developable on commercial, industrial and mixed-use parcels because development regulations for these uses are more restrictive. These uses are also more intensive than residential uses.

Steps

B.1. Create the **Critical Area Deduction** GIS layer (shapefile) consisting of all critical area deductions described as follows:

Critical Area Deductions

Wetlands: The County's possible wetland inventory.

Streams: The County's base stream dataset with stream centerlines and an assumed 35 feet of non-buildable area on either side of the centerline, corresponding with Tree Protection Zone 1 (TPZ 1) per SJCC Table 18.35.130-2.

Steep Slopes: Areas with slopes greater than 50 percent which are considered Category 1 geo-hazards. Development in these areas is limited per SJCC 18.35.065.

Flood Plain: Land located within 100-year floodplains as shown on the Federal Emergency Management Agency (FEMA), April 2017, Flood Insurance Rate Maps (FIRMS).

Other Undevelopable Areas: Mitigation and old dump sites that are not available or suited for development.

- 1 **B.2.** Create the **Total Net Developable Land Inventory** by deducting critical areas from the
2 GDLI. In GIS, overlay the Critical Area Deduction layer on the Gross Developable Land
3 Inventory and clip the Gross Developable Land Inventory. The result will be the Gross
4 Developable Land Inventory with critical areas removed. This layer is the **Total Net**
5 **Developable Land Inventory**.
- 6
- 7 **B.3.** Create the **Residential Net Developable Land Inventory** by selecting residential vacant,
8 partially used and re-developable parcels from the Total Net Developable Land Inventory.
9 The layer resulting from this selection is the **Residential Net Developable Land Inventory**.
- 10
- 11 **B.4.** Create the **Critical Area Buffer Deduction** GIS layer (shapefile). Create a GIS layer of
12 critical area buffers as follows:
- 13
- 14 a. A 150 foot wetland buffer because most of the County's wetlands are Class III or Class
15 IV and industrial and commercial uses are designated high intensity uses (SJCC
16 18.35.095 and Tables 18.35.100-2 and 18.35.100-2), and
- 17
- 18 b. The following Tree Protection Zone buffers on parcels with a shoreline FWHCA (SJCC
19 Tables 18.35.100-2 18.35.130-2):
- 20
- 21 i. 110 feet from the centerline for Type F (Type 2 or 3) streams and ponds
22 designated as FWHCAs (assuming an 8 foot wide stream);
- 23 ii. 110 feet from the Ordinary High Water Mark (OHWM) for marine shorelines
24 containing FWHCAs and ponds, excluding parcels subject to the Eastsound
25 Waterfront Access Plan or parcels within approved master planned resorts;
- 26 iii. 50 feet from the bank full width for Type Np (Type 4) streams;
- 27 iv. 30 feet from the bank full width for Type Ns (Type 5) streams; and
- 28 v. 30 feet from the bank full width for un-typed streams.
- 29
- 30 **B.5.** Create the **Commercial, Industrial and Mixed-Use Net Developable Land Inventory** as
31 follows:
- 32
- 33 a. Select vacant, partially used and Re-developable Commercial, Industrial and Mixed-
34 Use parcels from the Total Net Developable Land Inventory created in B.2.
- 35
- 36 b. Overlay the Critical Area Buffer Deduction layer over this selection and clip to remove
37 the critical area buffers. The resulting layer will be the **Commercial, Industrial and**
38 **Mixed Use Net Developable Land Inventory**.
- 39

1 **C. Calculate Existing Floor Area Ratios, Summarize Development Trends, Assign**
2 **Assumed Densities and Floor Area Ratio and Calculate Pending Development**
3 **Capacity**

4
5 This section provides analysis of past development trends in order to provide a basis for
6 estimating future development capacity; to determine if development is occurring consistent
7 with Comprehensive Plan densities; and to calculate pending development.

8
9 To calculate future capacity on vacant, partially-used and re-developable parcels, the Land
10 Capacity Analysis must use assumptions about how much development is expected on each
11 parcel in the future. Analysis of existing built conditions, achieved densities, and
12 development trends provides the data necessary to forecast future development.

13
14 This analysis will also account for pending development which is a more accurate predictor
15 of future densities. Later, achieved densities and building intensities will be used to calculate
16 the future capacity of available land.

- 17
18
 - 19 ■ Analyze recent development history and achieved densities and assign assumed
 - 20 densities,
 - 21 ■ Convert information into dwelling units per acre and building intensity Floor Area
 - 22 Ratio, and
 - 23 ■ Calculate pending development capacity

24 **C.1 Calculate Existing Building Floor Area Ratios by Land Use Designation**

25
26 One method to calculate future capacity on Commercial, Industrial and Mixed Use parcels is to
27 assume future Floor Area Ratios will be similar to Floor Area Ratio as past development. This
28 information will be used in Step C.3 to determine future assumed Floor Area Ratio.

29
30 For commercial, industrial and mixed-use parcels, Floor Area Ratio is good measure of how
31 much building capacity exists on a parcel. Floor Area Ratio is a good measure because it
32 accounts for parking, sewage disposal and other site improvements that affect capacity but
33 vary widely by use and from site to site. The capacity of a commercial, industrial or mixed-use
34 parcel is the assumed future Floor Area Ratio multiplied by the area of the parcel.

35
36 The following are the Steps to calculate the average existing Floor Area Ratio by land use
37 designation:

- 38
39 a. Select all parcels from the Land Capacity Analysis Land Base layer that are fully developed
40 and are Commercial, Industrial or Mixed-use land as defined by Table 1. Add a field for Floor
41 Area Ratio for each parcel.
42
43 b. Using Assessor building improvement information for the parcels selected in Step A,
44 calculate the ratio of total building square feet to lot area for each parcel. This results in a
45 floor area ratio for each parcel.
46
47

$$\text{FAR} = \frac{\text{Total building area (square feet)}}{\text{Parcel area (square feet)}}$$

c. Average the floor area ratio for each land use designation and export to an Excel table.

C.2 Summarize Recent Development Trends

The results of Step C.1 above will provide an average Floor Area Ratio for all Commercial, Industrial and Mixed-Use parcels as of March 3, 2017. This average will include buildings constructed under many different land use and building regulations, and therefore may not be accurate for forecasting into the future if regulations have changed and significantly altered the amount of development that is allowed. In order to check the reliability of the averages developed in C.1, the Land Capacity Analysis must also evaluate development that occurred within the recent past to see if there are other development trends to consider.

Ten years of County development history (April 1, 2005 – April 1, 2015) is evaluated to determine the actual densities achieved in all land use designations and Urban Growth Areas (UGA's). Department of Community Development staff performs this analysis using permit files.

Table 2. Basic Achieved Density Calculations by Development Type

Development Type	Achieved Density Calculation
Single Family Residential Plats	Number of Lots / Plat Area
Multi-family Building Permits and Plats	Number of Units / Site Area
Mixed-Use Building Permits Residential Portion	Number of Units / Residential Portion of Site
Mixed-Use Building Permits Commercial Portion	Commercial Floor Area / Commercial Portion of Site
Commercial and Industrial Building Permits	Total Floor Area (main building)/ Site Area

Create an Excel table and compile data from permit files as follows:

Table 3. Achieved Density by Land use Designation

A. Parcel	B. Land Use Designation	C. Permit #	D. Plat area or lot site area (SF)	E. Pending lots (Number of lots approved)	F. Pending housing units (Number approved)	G. Pending building square feet (SF approved)	H. Achieved FAR	I. Achieved Density (DU/acre)
							= G/D	= F/(D/43,560)

Source: DCD permit data April 1, 2005- 2015

C.3 Assign Assumed Density and Floor Area Ratios (FAR)

Each land use designation will be assigned an assumed density for the purposes of calculating capacity. For residential capacity, the Comprehensive Plan land use designations and densities are the future assumed densities. For commercial and industrial building intensity, existing average Floor Area Ratio by land use designation will be used. For mixed-use intensity, an assumed density and Floor Area Ratio will be used based on land use regulations and existing FAR.

Different assumptions may be used if there is a clear and compelling rationale for deviating from these designations. The following factors would be considered in deviating from the assumed densities: recent achieved densities; land use goals and policies; local circumstances such as development plans and pending development; and any other local market or policy conditions that are likely to impact future development densities.

C.4. Calculate Pending Development Capacity

This Step accounts for pending development which is a more accurate predictor of future density than assumed densities. It involves compiling parcels with approved multi-family permits, commercial and industrial binding site plans, and preliminary and final plats that were not constructed by March 3, 2017 (last date of Assessor's update). This includes Master Planned Projects that are not completely built out but that have received preliminary approval for a number of dwelling units or commercial and industrial square footage. These developments will be considered pending capacity and will be added to the final land capacity for each parcel during the final capacity calculations.

For this analysis, the development records for all multi-family, commercial, industrial, binding site plans, and preliminary and final plats approved since January 1, 2010 that were not finalized prior to March 3, 2017 are compiled including:

- Residential preliminary and final approved plats and short plats;
- Multi-family building permits;
- Assessor's county-wide parcel data in shapefile format; and
- Commercial and industrial building permit activity and binding site plans.

Create an Excel table and compile data as follows:

Table 4. Pending Development Capacity.

A. Parcel	B. Land Use Designation	C. Permit #	D. Plat area or lot site area (SF)	E. Pending lots (Number of lots approved)	F. Pending housing units (Number approved)	G. Pending building square feet (SF approved)	H. Achieved FAR	I. Achieved Density (DU/acre)
							= G/D	= F/(D/43,560)

Source: DCD permit data April 1, 2005-2015 and GIS shapefiles

1
2 **Deliverables:**

3
4 Excel tables that summarize the following by land use designation and island:

- 5 • Achieved densities;
 - 6 • Achieved floor area ratios;
 - 7 • Existing floor area ratios;
 - 8 • Recommended assumed densities to be used in Step D; and
 - 9 • Pending development capacity to be used in Step D.
- 10

11 **D. Calculate and Map Gross Housing and Commercial Development Capacity**

12
13 The purpose of this Step is to graphically display capacity at the parcel level. This work is
14 conducted in GIS and produces maps showing capacity by parcel.

15
16 The Net Developable Land Inventory (in acres) is converted into capacity for housing units on
17 residential land and building square feet on commercial, industrial and mixed-use land.

18
19 The capacity calculated in this Step will not be the final capacity because it will not be
20 converted to population and will not include deductions for public uses, market factors, and
21 seasonal/recreational home factors. Those deductions will be taken to obtain final
22 capacity in Step E.

23
24 The following conversion factors as modified by Step C.3 are used in this Step:

- 25 a. Density allowed by Comprehensive Plan land use designation for residential, and
 - 26 b. Average existing floor area ratio for fully developed commercial and industrial by
 - 27 land use designations.
- 28
29
30

31 **Determine Gross Housing Unit Capacity**

32
33 **Gross Housing Unit Capacity** is derived from the Residential Net Developable Land Inventory
34 developed in Step B.3. The output will be total dwelling units of capacity available on each
35 parcel. These calculations use:

- 36
 - 37 ■ The Residential Net Developable Land Inventory;
 - 38 ■ Assumed densities for residential land use designations; and
 - 39 ■ Pending development capacity.
- 40

41 **D.1** Using GIS, multiply the net developable acres of residential developable land on each
42 parcel by the assumed density (DUs/acre) for each land use designation. The output will
43 be the Total Dwelling Unit Capacity available on each parcel before accounting for existing
44 development on partially-used and re-developable parcels.

45
46 **D.2** Subtract existing dwelling units on partially-used and re-developable parcels by land use
47 from the capacity calculated in the previous Step so that existing units are not counted
48 as part of partially-used or parcel capacity

D.3 Earlier in the process, parcels with pending developments were set aside. These parcels included preliminary or final plats, permits, and binding site plans for developments that have received preliminary approval but have not been constructed by March 3, 2017. Master Planned Projects that have not been completely built out but have received approval for a certain number of dwelling units are also included. The estimated capacity in these developments is more accurate than calculated theoretical capacity. Add these pending housing units to the parcels on which they occur.

D.4 Using GIS and the Residential Net Developable Land Inventory, calculate capacity for each parcel using the following fields and export to Excel table:

Table 5. Gross Housing Capacity by Land Use Designations.

A. Parcel Number	B. Area	C. Land Use Designation	D. LCA Category (Vacant, Re-developable, Partially used etc...)	E. Comprehensive Plan Density (assumed density)	F. Existing Housing Units	G. Pending Housing Units	H. Housing Capacity (Housing Units)
							= (B*E) - F OR = G-F (if pending >0)

Determine Commercial and Industrial Land Capacity

Capacity to accommodate future commercial or industrial growth is derived from the net developable area in commercial and industrial land use designations. This work requires the following data:

- The Commercial and Industrial Net Developable Land Inventory created in Step B.5;
- Assumed Floor Area Ratio values for commercial and industrial designations created in Step C.3;
- Assessor’s data for re-developable parcels; and
- Pending commercial and industrial development from Step C.4.

D.5 Multiply net acres of commercial and industrial land in each land use designation by the assumed Floor Area Ratio for each land use designation. The output will be the **Total Square Footage Capacity** available in each land use designation before accounting for existing development on re-developable parcels.

D.6 Summarize total existing commercial and industrial building square footage on parcels by land use designation. Subtract this square footage from the totals from the previous Step so that existing buildings are not counted as part of re-developable parcel capacity.

D.7 Earlier in the process, parcels with pending developments were set aside. These parcels included commercial and industrial permits or binding site plans for developments that have received preliminary approval but had not been constructed by March 3, 2017. Master Planned Projects that have not been completely built out but have received

approval for a certain amount of commercial/industrial square footage are also included. The estimated capacity in these developments is more accurate than calculated theoretical capacity. Replace theoretical capacity on each parcel with actual capacity from Step C.4. The output will be total commercial and industrial square footage capacity available in each land use designation.

Deliverables:

- Map layers (GIS Shapefiles) of the Net Developable Land Inventory parcel map of commercial, industrial, and mixed-use lands including the following fields in the attribute table:

Table 6. Gross Commercial and Industrial Land Capacity.

A. Parcel Number	B. Area	C. Comp Plan Land Use Designation	D. LCA Category (Vacant, re-developable etc.)	E. Assumed Floor Area Ratio	F. Existing Total Floor Area	G. Pending Floor Area	H. Building Capacity (Square Feet)
							= (B*E) - F OR G+F (If pending>0)

- Net Developable Land Inventory parcel map of mixed use lands including the following fields in the attribute table:

Table 7. Gross Mixed-Use Capacity.

A. Parcel No.	B. Area	C. Land use designation	D. Category (Vacant, redevelopable etc.)	E. Assumed Floor Area Ratio	F. Comprehensive Plan Density or Achieved Densities	G. Existing total floor area	H. Existing Housing Units	I. Pending Floor Area	J. Pending housing units	K. Building capacity (Square Feet)	L. Housing Capacity (Housing Units)
										= (B*E) - G OR G+I (if pending>0)	= (B*F) -H OR J-H (if pending >0)

Excel Tables for County-Wide Capacity and Capacity for Each Island Depicting:

- Totals of residential acreage and capacity (housing units) by land use designation;
- Totals of residential acreage and capacity by category (vacant, partially used etc.) and by land use designation;
- Totals of commercial and industrial acreage and capacity (building square feet) by land use designation;
- Totals of commercial and industrial acreage and capacity by category (vacant, partially used etc.) and by land use designation;

- 1 5. Totals of mixed-use acreage and capacity (building square feet) by land use
2 designation and category (vacant, partially used etc.); and
3
4 6. Totals of mixed-use acreage and capacity (housing units) by land use designation and
5 category (vacant, partially used etc.).
6

7 **Maps**
8

- 9 1. Residential Net Developable Land Inventory with parcels categorized in housing
10 capacity ranges;
11
12 2. Commercial and Industrial Net Developable Land Inventory parcel maps with parcels
13 categorized in building capacity ranges;
14
15 3. Mixed Use Net Developable Land Inventory maps of mixed use lands with parcels
16 categorized in building capacity ranges;
17
18 4. Mixed Use Net Developable Land Inventory maps with parcels categorized in housing
19 capacity ranges.
20

21 **E. Calculate Final Capacity**
22

23 Conduct the **Final Capacity** calculations using the Excel tables created in Step D, **Gross Capacity**.
24 Add a new column to the tables to include the Final Capacity numbers. The Final Capacity
25 column reflects the gross capacity from Step D minus the capacity deductions described below:

26 *Deduct Capacity to Account for Public Use, Market, Seasonal/Recreational Home Factors*

27 **Public Use Factor**

28 The Public Use Factor is a deduction to account for the lands that may be used for public
29 purposes, such as road right-of-ways, utility corridors, public pathways and other lands set
30 aside for public uses. A public use factor of five percent (5%) will be deducted.

31 **Market Factor**

32 The market factor is a deduction to account for lands that will not be available for
33 development during the planning period. It is expected that over the 20-year planning period
34 some lands will be kept off the market due to speculative holding, land banking, and personal
35 use. A market factor of twenty-five percent (25%) of the Developed Land Inventory will be
36 deducted to account for the land that is not available for development during the planning
37 period.

38 **Seasonal/Recreational Home Factor**

39 The 2010 US Census indicated that 35 percent (35%) of the houses in the County were
40 categorized as seasonal/recreational, or occasional use properties. Recent comparisons of the

1 population increases and finalized residential building permits indicate that between 2010 and
2 2016 approximately one and one half (1.5) housing units were built for each new resident.
3 An additional deduction of ~~twenty five percent (25%)~~ thirty five percent (35%) of the gross
4 housing capacity will be deducted to account for the recreational home market.

5
6 **E.1** To each Excel tables developed in Section F, add columns for “Public Use Deduction”,
7 “Market Factor”, “Seasonal/Recreational Home Factors”, “Capacity Deduction”,
8 “Occupied Housing Units”, “Total Population Capacity” and “Final Building Capacity”.

9
10 **E.2** Add the following factors to the tables in Step D as applicable:

- 11
- 12 ▪ A 5 percent (5%) public use factor for all designations;
- 13
- 14 ▪ For vacant residential designations: a 25 percent (25%) market factor, plus an
15 additional ~~25~~ 35 (~~25~~ 35%) percent seasonal, recreational or occasional use home
16 factor;
- 17
- 18 ▪ For partially-used residential parcels: a 25 percent (25%) market factor and an
19 additional ~~25~~ 35 (~~25~~ 35%) percent seasonal, recreational or occasional use home
20 factor;
- 21
- 22 ▪ For vacant commercial or industrial land use designations: a 25 percent (25%)
23 market factor; and
- 24
- 25 ▪ For a re-developable commercial or industrial parcels: a 25 percent (25%) market
26 factor.
- 27
- 28

29 **E.3** A market factor will be applied to Master Planned Resorts as a proportionate share
30 based on the ratio of developed to undeveloped areas within the Master Planned Resort.
31 See Section C.

32
33 **E.4** In the “Capacity Deduction” column calculate the total amount of capacity to be
34 subtracted based on Steps G.2 and G.3.

35
36 **E.5** Calculate the Total Occupied Housing Units by Land Use Designation. To convert dwelling
37 units into occupied housing units use the following data on occupancy rates and average
38 household sizes:

- 39
- 40 ▪ Apply occupancy rate assumptions for the County by using best available data
41 from Washington Office of Financial Management (OFM) and/or the US Census.
42 Seasonal housing is considered vacant according to Census definitions. These
43 housing units are not included in the occupied housing unit category and are not
44 folded into Census calculations of average household size.
- 45
- 46 ▪ Multiply the total housing units of capacity in each land use designation by the
47 occupancy rate assumption. The output will be total occupied dwelling units in
48 each land use designation. Add this result in a column to the table modified as part
49 of Step 1 called “Occupied Housing Units”.

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E.6 Calculate the **Total Population Capacity**. In the “Total Population Capacity” Column, subtract “Capacity Reduction” from the “Housing Capacity” column and multiply the result by the average household size for the County which is 2.04 to calculate “Total Population Capacity”.

E.7. Calculate **Employment Capacity**. In the “Total Building Capacity” column, subtract “Capacity Reduction” from the “Building Capacity” column to calculate “Total Building Capacity.”

Deliverables:

Excel Tables for County-Wide Final Capacity and Final Capacity for Each Island Depicting:

1. Totals of residential acreage and final capacity (housing units and population) by land use designation;
2. Totals of residential acreage and final capacity by category (vacant, partially used etc.) and by land use designation;
3. Totals of commercial and industrial acreage and final capacity (building square feet) by land use designation;
4. Totals of commercial and industrial acreage and final capacity by category (vacant, partially used etc.) and by land use designation;
5. Totals of mixed-use acreage and final capacity (building square feet) by land use designation and category (vacant, partially used etc.); and
6. Totals of mixed-use acreage and final capacity (housing units) by land use designation and category (vacant, partially used etc.).

Use Code Table

Attachment G

Use Code	Description	ABS Code	FID
1100	HOUSEHOLD, SINGLE FAMILY UNITS	SFR	15
1101	SGL FAMILY UNIT - OWNER BUILT	SFR	17
1102	SGL.FAMILY UNIT/MFG OR MODULAR	SFR	19
1103	SGL FAMILY UNIT WITH DOCK	SFR	21
1104	SGL FAM UNIT/OWNER BLT & DOCK	SFR	23
1107	SFR W/ FREESTANDING ADU	SFR	25
1108	SFR W/ VACA RENT-MAIN HOUSE	SFR	27
1120	SNGL FAM RES W/CONS ESMT	SFR	29
1123	SGL FAMILY W/DOCK & CONS ESMT	SFR	31
1127	DO NOT USE (use 1128)	SFR	33
1128	SGL FAM W/GUEST HOUSE W/CONS E	SFR	35
1130	3 OR MORE SFR'S	SFR	37
1137	SFR WITH INTERNAL ADU	SFR	40
1138	SFR W/ VACA RENT INTERNAL ADU	SFR	41
1147	SFR W/ ATTACHED ADU	SFR	43
1148	SFR 2/ VACA RENT ATTACHED ADU	SFR	45
1158	SFR W/ DETACHED ADU VACATION RENTAL	SFR	47
1180	**NO LONGER USED. USE 1158 INSTEAD**	***	49
1188	SFR W/ VACA RENT MN HOUSE / ADU	SFR	51
1190	IMPROVEMENT ONLY - RESIDENCE	SFR	53
1192	IMPROV ONLY - RES, MOBILE, ETC	SFR	55
1200	HOUSEHOLD, 2-4 UNITS IN 1 BLDG	COM	57
1201	HOUSEHOLD,2-4 UNIT,OWNERBUILT	COM	59
1203	HOUSEHOLD,2-4 UNIT W/DOCK	COM	61
1207	DUPLEX W/ FREESTANDING ADU	COM	63
1208	DUPLEX VACA RENT FREE ST ADU	COM	65
1220	RES 2-4 W/CONS ESMNT	COM	67
1223	HSHLD,2-4 UNIT,CONS ESMT &DOCK	COM	69
1300	HOUSEHOLD, MULTI-UNITS	COM	71
1302	HOUSEHOLD, MULTI-UNIT, MOD/MFG	COM	74
1400	RESIDENTIAL HOTELS/CONDOS	COM	75
1403	BED & BREAKFAST W/DOCK	COM	77
1407	B&B	COM	80
1408	B&B W/ DETACHED VACA RENTAL	COM	82
1418	RESIDENTIAL CONDO VACA RENTAL	COM	84
1488	RESIDENTIAL HOTEL/CONDO W/DFL	COM	86
1500	MOBILE HOME PARKS OR COURTS	COM	88
1600	HOTEL/ MOTEL	COM	90
1700	INSTITUTIONAL LODGING	COM	92
1800	UNDEVELOPED RESIDENTIAL < 5AC	SFR	93
1801	<5 WITH NON-HABITABLE IMPS	SFR	95
1803	UNDEV.RES. WITH DOCK	SFR	96
1820	UNDEV.RES W/CONS ESMT	SFR	97
1823	UNDEV.RES W/CONS ESMT AND DOCK	SFR	98
1895	IMPROV. ONLY ON RES. UNDEVELOP	SFR	99
1900	VACATION OR CABIN	SFR	100

Use Code Table

Attachment G

1901	VACATION & CABIN -OWNER BUILT	SFR	101
1902	VACATION & CABIN/MFG OR MOD	SFR	102
1903	VACATION & CABIN W/ DOCK	SFR	103
1920	VACATION & CABIN W/CONS. ESMT	SFR	104
2100	FOOD AND KINDRED PRODUCTS	COM	105
2200	TEXTILE MILL PRODUCTS	COM	106
2300	COMAREL & OTHER FINISHED PROD.	COM	107
2400	LUMBER AND WOOD PRODUCTS	COM	108
2403	LUMBER & WOOD PROD. W/ DOCK	COM	1
2500	FURNITURE & FIXTURES	COM	2
2600	PAPER & ALLIED PRODUCTS	COM	3
2700	PRINTING AND PUBLISHING	COM	4
2800	CHEMICALS	COM	5
2900	PETROLEUM REFINING AND RELATED	COM	6
3100	RUBBER & MISC PLASTIC PRODUCTS	COM	7
3200	STONE, CLAY & GLASS PRODUCTS	COM	8
3300	PRIMARY METAL INDUSTRIES	COM	9
3400	FABRICATED METAL PRODUCTS	COM	10
3500	PROF. & SCIENTIFIC INSTRUMENTS	COM	11
3900	MISCELLANEOUS MANUFACTURING	COM	12
4100	RAILROAD/TRANSIT TRANS.	COM	13
4200	MOTOR VEHICLE TRANSPORTATION	COM	14
4300	AIRCRAFT TRANSPORTATION	COM	16
4395	IMP ONLY - AIRCRAFT TRANS	COM	18
4400	MARINE TRANSPORTATION	COM	20
4403	MARINE TRANSPORTATION W/DOCK	COM	22
4500	HIGHWAY RIGHT-OF-WAY	COM	24
4600	AUTOMOBILE PARKING	COM	26
4700	COMMUNICATION	COM	28
4795	IMPROVE. ONLY -COMMUNICATIONS	COM	30
4800	UTILITIES	COM	32
4820	UTILITY WITH CONS ESMT	COM	34
4900	OTHER TRANSPORTATION	COM	36
4995	IMP ONLY/UTIL & TRANSPORTATION	COM	38
5000	NON-RESIDENTIAL CONDOMINUMS	COM	39
5100	WHOLESALE TRADE	COM	42
5200	RETAIL -BUILDING & HDWE & FARM	COM	44
5295	IMPROV ONLY-RETAIL BLDG, HDWE	COM	46
5300	RETAIL - GENERAL MERCHANDISE	COM	48
5320	RETAIL - GENERAL W/CONS ESMT	COM	50
5400	RETAIL - FOOD	COM	52
5403	RETAIL - FOOD W/DOCK	COM	54
5500	RETAIL - AUTO, MARINE & AIRCRAFT	COM	56
5503	RETAIL - AUTO, MARINE & AIRCRAFT W/DOCK	COM	58
5600	RETAIL - APPAREL	COM	60
5700	RETAIL - FURNITURE & HOME FURNISHINGS	COM	62
5708	RETAIL W/VACATION RENTAL	COM	64

Use Code Table

Attachment G

5800	RETAIL - EATING AND DRINKING	COM	66
5895	IMPROV ONLY - RETAIL EATING	COM	68
5900	OTHER RETAIL	COM	70
6100	FINANCE, INSURANCE, & REAL EST	COM	72
6200	PERSONAL SERVICES	COM	73
6220	PERSONAL SVS W/CONS ESMT	COM	76
6300	BUSINESS SERVICES	COM	78
6400	REPAIR SERVICES	COM	79
6402	REPAIR SERVICE WITH MOBILE	COM	81
6500	PROFESSIONAL SERVICES	COM	83
6502	PROFESSIONAL SERVICES W/MOBILE	COM	85
6503	PROFESSIONAL SERVICES W/ DOCK	COM	87
6600	CONTRACT CONSTRUCTION SERVICES	COM	89
6700	GOVERNMENTAL SERVICES	COM	91
6793	GOVERNMENTAL SERVICES W/DOCK	COM	94
6795	IMP ONLY - GOVT SERVICES	COM	109
6800	EDUCATIONAL SERVICES	COM	110
6820	EDUCATIONAL SVS W/CONS ESMT	COM	111
6895	EDU SERVICES - IMPROV ONLY	COM	112
6900	MISCELLANEOUS SERVICES	COM	113
6902	MISC. SERVICES W/MOBILE	COM	114
6995	IMP ONLY ON MISC SERVICES	COM	115
7100	CULTURAL ACTIVITIES	COM	116
7200	PUBLIC ASSEMBLY	COM	117
7202	PUBLIC ASSEMBLY/MFG OR MODULAR	COM	118
7300	AMUSEMENTS	COM	119
7400	RECREATIONAL ACTIVITIES	COM	120
7403	RECREATIONAL WITH DOCK ONLY	COM	121
7420	REC. ACTIVITIES W/CONS ESMT	COM	122
7500	RESORTS AND GROUP CAMPS	COM	123
7600	PARKS	COM	124
7900	OTHER RECREATIONAL	COM	125
8100	AGRICULTURE	OTH	126
8120	AGRICULTURE W/CONS ESMNT	OTH	127
8195	IMPROV. ONLY ON AGRICULTURAL	OTH	128
8200	AGRICULTURAL RELATED	OTH	129
8220	AGRICULTURE RELATED W/CONS ESM	OTH	130
8300	CURRENT USE FARM & AGRICULTURE	OTH	131
8302	FARM & AG W/MOBILE	OTH	132
8303	FARM & AG W/DOCK	OTH	133
8307	FARM & AG W/GUEST HOUSE	OTH	134
8308	FARM & AG W/VACATION	OTH	135
8320	FARM & AG W/ CONS ESMT	OTH	136
8322	FARM & AG W/CONS ESMT; MOBILE	OTH	137
8328	FARM & AG W/CONS ESMT; VACAT RENTAL	OTH	138
8400	FISHING & RELATED SERVICES	OTH	139
8500	MINING ACTIVITIES	OTH	140

Use Code Table

Attachment G

8600	MARIJUANA GROW OPERATION	OTH	141
8800	DESIGNATED FOREST LAND	OTH	142
8820	DFL W/CONS ESMNT	OTH	143
8900	OTHER RESOURCE PRODUCTION	OTH	144
9100	UNDEVELOPED LAND/OVER 5.00 AC	OTH	145
9101	>5 ACRES WITH NON-HABITABLE IMPS.	OTH	146
9103	UNDEV LAND OVER 5 ACRES W/DOCK	OTH	147
9120	UNDEVELOPED W/CONS ESMNT	OTH	148
9123	UNDEV >5 AC W/DOCK & CONS ESMT	OTH	149
9200	NONCOMMERCIAL FOREST	OTH	150
9300	WATER AREAS	OTH	151
9303	WATER AREA WITH DOCK	OTH	152
9320	WATER AREA W/CONS EASEMENT	OTH	153
9400	OPEN SPACE	OTH	154
9403	OPEN SPACE W/DOCK	OTH	155
9408	OPEN SPACE W/VACATION RENTAL	OTH	156
9420	OPEN SPACE W/CONS ESMT	OTH	157
9423	OPEN SPACE W/CONS ESMT; DOCK	OTH	158
9430	OPEN SPACE FARM CONSERVATION	OTH	159
9500	CURRENT USE TIMBER LAND	OTH	160
9520	CURRENT USE TIMBER LAND W/CONS ESMT	OTH	161