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From: tina@sanjuans.org
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Attached please find comments from Friends of the San Juans on the land capacity analysis.

Thanks

Tina

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San Juan County Community Development

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Friends of the San Juans has reviewed the San Juan County Land Capacity Analysis (LCA) report and we appreciate the significant amount of work that has gone into the analysis. We submit the following comments for consideration and look forward to a final draft that improves confidence in the accuracy of the analysis and its results.

1. **First, we question the decision to rely on a complex system of assumptions to essentially model each stage of the land capacity analysis, instead of simply using the actual data.**

The San Juan County Assessor's data provides accurate parcel acreage and can be queried by land use designation and other factors, eliminating the need to rely on assumptions. If the current modelled approach is retained, a robust quality review and sensitivity analysis must be added to see which assumptions (rules/inputs) are having the most impact on results and if those results are logical (e.g., consistent with reality) or are instead an unintended consequence of the methods.

A few examples of the major issues that occur when actual data isn't relied on for the analysis are provided below, along with potential solutions.

a) Removal of critical areas from the net developable lands inventory underrepresents actual development potential.

As the net developable lands inventory is the closest thing to a buildout scenario the county is including in the comprehensive plan update, and provides the basis for all future stages of the LCA, the information must be as accurate as possible. This is especially true as multiple additional reductions in capacity are made in subsequent steps that rely on a suite of additional assumptions. Quite simply, the removal of critical areas from the developable lands calculations does not make sense. The development of critical areas such as wetlands and steep slopes exists through multiple pathways, including critical areas reports with no net loss findings as well as reasonable use exceptions. As a result, removing density from these areas is not supported by either the current code or the way development is authorized and occurring in the county. Critical areas must be included in the net developable lands inventory.

b) Assumption of consistent parcel size despite the reality of many smaller, still developable parcel sizes also under-counts development potential.

For example, an assumption of a 5 acre parcel size per dwelling unit for the entire rural farm forest (RFF)

land use category fails to account for the extensive number of legal parcels that exist that are both smaller than 5 acres *and* allowed to be developed. Using the Assessor's LANDUSE shape files, a quick query of parcels in the RFF designation results in 7,212 parcels with a mean size of just over 6 acres. But over half (n=3,889) of the parcels are less than 5 acres in size.

At a minimum the distribution of various parcel sizes (min., max., mean, mode) within each land use designation must be reviewed to understand the potential scale of bias within that assumption, its effect on results and then the analysis adjusted to better reflect reality. One potential solution to address the impacts of small parcel sizes is to set the development factor for all legal parcels less than 5 acres in RFF at a value of 1, instead of a fraction of 1, as was done in the LCA.

c) Percentages utilized to reduce maximum capacity and estimate final capacity need further review.

The percentages applied seem fairly arbitrary and are large, especially since previous assumptions built into the analysis are likely already influencing results and may also be artificially reducing development potential. The rationale is behind the percentages used to estimate reduction in capacity through public uses, speculative holding and seasonal, recreational and limited use housing stock should be better explained. Are the numbers based on an approximation of on-the-ground conditions? Ranges used in past similar analysis? Related to values used by other communities with land use patterns similar to ours? Or something else?

2. Balance of growth objectives and details on the relationships between growth in rural and urban areas should be clarified.

The current approach of summarizing results for rural lands across the entire county does not support meaningful understanding of the relationship between development outside of and within the urban growth areas (& land activity centers etc.). As a key objective of the LCA is to determine if there is adequate capacity within the UGAs and to ensure that the intended balance of growth between the rural and urban areas is able to be met, site specific results for Orcas and Lopez, and really all islands, is required.

In the methods, draft report and presentation it was noted that the majority of growth in the county occurs outside of the urban areas and it was also mentioned that the 50/50 split between rural areas and urban and activity centers was a voluntary choice made last time that is open to change this time around. We disagree that this balance of urban and rural growth is wide open to reallocation and encourage the county to carefully review and clarify its planned approach to this topic. This is a fundamental underlying components to both the LCA and the comprehensive plan update.

3. General accuracy review needed

During the presentation of the LCA that I attended, people in the room viewing the small area shown as an example on the map identified parcels that had been incorrectly categorized. The county needs to ensure

that this process includes a discrete quality review process to evaluate for accuracy and ensure that errors are not widespread. A clear process for quality review should be implemented and described in the final report, ensuring that public comments aren't the primary source of quality control.

4. Ensure that the SJCC 18.30.170C San Juan Valley Agricultural Heritage Open Space Conservation Overlay District has been incorporated.

This allows for increased density in that Ag Resource area. It is unclear how examples like this one, that impact density, have been incorporated into the LCA.

In summary, there seem to be two primary paths to resolving the fact that the numerous underlying assumptions employed are impacting the results of the LCA to a currently unknown (or undescribed) degree. The first, and most robust solution is simply to conduct the analysis using the parcel scale data, which would ensure results reflect actual conditions. If using the county's own base data is not possible for some reason (no discussion of this was seen in the report), a thorough quality review and sensitivity analysis of the various assumptions must be conducted to understand the both magnitude and direction of their impact on LCA results as well as to support subsequent adjustments to methods based on the finding to tighten the relationship between on-the-ground accuracy and the modelled approach employed. We encourage the community development department to work closely with the assessor's office and the county's GIS staff to develop a reasoned path forward and increase confidence in the accuracy of the results.

Thank you for your consideration.

Sincerely,

TINA WHITMAN

Tina Whitman
Science Director