



SAN JUAN COUNTY DEPARTMENT OF COMMUNITY DEVELOPMENT

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dcd@sanjuanco.com | www.sanjuanco.com

MEMO

MEMO DATE: November 25, 2019

TO: San Juan County Council
San Juan County Planning Commission

CC: Mike Thomas, County Manager
Erika Shook, AICP, Director DCD

FROM: Adam Zack, Planner III 
Linda Kuller, AICP, Planning Manager

SUBJECT: 2036 Comprehensive Plan Update
Land Capacity Analysis (LCA) Report

BRIEFINGS: County Council: November 26, 2019
Planning Commission: December 20, 2019

ATTACHMENT: Public Comments received November 5 through 25, 2019.

Purpose: Public comments received November 5 through 20, 2019 are attached. A brief staff response to answer the commenter's question in the comment dated November 22, 2019.

Adam Zack

From: Erika Shook
Sent: Tuesday, November 5, 2019 8:10 AM
To: Comp Plan Update
Cc: Adam Zack
Subject: FW: Land capacity analysis Sept 6, 2019
Attachments: Scenario D.xlsx; ATT00001.htm

From: Rick Hughes <rickh@sanjuanco.com>
Sent: Monday, November 4, 2019 8:57 PM
To: Erika Shook <erikas@sanjuanco.com>; Mike Thomas <miket@sanjuanco.com>
Subject: Fwd: Land capacity analysis Sept 6, 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: November 4, 2019 at 6:37:46 PM PST
To: Paul Kamin EWUA <pkamin@rockisland.com>, Terry Gillespie <terrywg57@gmail.com>, brian wiese <brian_wiese@outlook.com>, joAn Mann <jo.an.a.mann@gmail.com>, Leith Templin <leithtemplin@hotmail.com>, "Charles Toxey" <innkeeper@kangaroohouse.com>, Rick Hughes <rickh@sanjuanco.com>, Fred Klein <freddythek10@gmail.com>
Subject: Land capacity analysis Sept 6, 2019

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 EPRC, Earlier this month we received the first draft of the conclusions of the LCA. On page 2 of the report we found that Eastsound has a projected supply of 474 dwelling units (against a need for 245) based on the scenario C that assumes the VC zone develops 100% residential. That seems neither a desirable nor likely option to base a plan upon.

Additionally the analysis finds a commercial development capacity of 594,362 s.f. based on scenario A (that assumes VC develops 100% commercial). This is a more plausible option but it is mutually exclusive with the former selection. Neither of these scenarios seems to me to represent what the Eastsound Plan projects as the direction or mix of uses for a future Eastsound. In fact almost all Eastsound land use zones are "mixed

use " zones. All the ER zones permit care facilities, utility and emergency facilities and community facilities. Village Institutional/Residential permits a wide range of non-residential and office uses in addition to residential uses.

So, now that we can see how this system works, I suggest we craft a Scenario D that represents the kind of Eastsound that currently exists and the Plan projects. Consider this scenario:

1. Village Commercial and Marina develops 95% commercial and 5% residential.
2. Village Institutional develops 75% residential and 25% non-residential.
3. All the Eastsound Residential zones develop 95% residentially.

Attached is a rough attempt to plot such a Land Capacity Analysis. Note that this is based on the same innumerate methodology that CDP is using for comparison. The conclusion, that there is a small shortfall of development capacity, seems consistent with a methodology that under estimates demand or growth and includes every, however unlikely, unit of development capacity. (Print the attachment legal size if possible.)

.....jmc

ps .It is worth noting that over the past ten years, the projected development capacity of Eastsound, with no change in land boundaries or zoning and notwithstanding considerable residential development has doubled from 687 units in 2009 to 1,3599 today. Different *methodologies*.

Adam Zack

From: Timothy Blanchard <tim@blanchardmanning.com>
Sent: Sunday, November 17, 2019 6:00 PM
To: Comp Plan Update
Subject: Land Capacity Analysis Report

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Comments on the Second Draft (November 4, 2019): Very briefly, in order of appearance in the Draft:

Pages 23-27, 37, 39: Please include the full Land Use Designation names in the tables. It is so much easier to use that way.

Page 23: Should “FO” in Table 8 be “FOR” for Forest Resource?

Page 65: I recommend adding a footnote to the first bullet point under County-wide Residential Capacity to make clear to readers that the maps do not reflect reductions in actual development capacity as a result of conservation easements, open space agreements and other parcel-specific agreements to limit development. This should also be addressed in the related Definitions at Pages 83-84.

Page 66: I recommend some notation addressing the apparent disconnect (discussed in a prior Planning Commission meeting) between the recognition that some of the second homes are planned future/retirement homes and the failure to take this into account in estimating the number of new homes required to accommodate the projected population growth. In other words, because part of the projected new population has already built their homes (and these existing homes are not being used to house current population, so no replacement will be necessary to house current population or future population) fewer new homes than projected should be necessary to accommodate the population projections.

Page 67: Please provide additional explanation regarding footnotes 1 and 2 to Table 34.

Page 69: The Decatur Rural General Use anomaly should be discussed further since it is derived entirely as a result of the generality of uses permitted that land use designation. The County has not created a bunch of superfluous commercial zones on Decatur, but has allowed great flexibility in the use of that land.

Page 71, Line 36: It looks like either “increasing” OR “including” should be selected.

Page 79, Line 16: I would replace “cadre” with another word so as not to personify “issues.”

I also recommend including an explanation in an appropriate place regarding how members of the public can interpret the information provided in the analysis to understand geographically the maximum buildout or additional development between now and the maximums allowed by the current mapped densities.

Thanks for all of the hard work on this.

Timothy P. Blanchard
259 Mount Woolard Road
Easesound, WA
O: 360.376.2292
C: 310.925.9646

Adam Zack

From: LYNN DIETZ <grantlynn@comcast.net>
Sent: Monday, November 18, 2019 12:49 PM
To: Comp Plan Update
Subject: RE: Second Draft Land Capacity Analysis Report

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.

This lot on Old Farm Rd has been developed.
The house and garage are either recently completed or nearly completed.

-Lynn Dietz (neighbor on Spychop Lane)



Adam Zack

From: jmc779@rockisland.com
Sent: Tuesday, November 19, 2019 8:34 PM
To: Adam Zack
Cc: Paul Kamin EWUA; brian wiese; Terry Gillespie; Leith Templin; Charles Toxey; joAn Mann; Fred Klein; Rick Hughes
Subject: Land Capacity Analysis
Attachments: Scenario D.xlsx

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Dear Adam,

Rummaging thru my records, I do not find that I have sent you my concern about the conclusions on page 2 of the November 2 Second Draft LCA. Specifically that the Eastsound UGA has sufficient developable land available for 472 dwelling units **and** 594,362 sf of commercial development. Leaving aside the issues of innumeracy and methodology, it simply isn't so. Each of those numbers is based upon a different, mutually exclusive "Scenario".

The residential capacity, 472 according to scenario C, assumes that all the Village Commercial and Marina districts as well as all other residential districts develop residentially to 100% of capacity. This is an inconceivable and most undesirable eventuality.

The commercial capacity, 594,362 sf according to scenario A, assumes that the Village Commercial and Marina districts develop commercially to 100% of capacity. While this scenario is more plausible, it is incompatible with scenario C. The two scenarios are mutually exclusive alternatives. The scenarios do however provide some useful numbers of capacities to plan with.

The primary point of this LCA initiative is to determine whether there is sufficient appropriately zoned land in the Eastsound UGA to accommodate the projected residential growth under the present goals, policies and zoning. That target, from the current Comp Plan Housing Needs Assessment, is 252 dwelling units. So, it is time to do some planning and evaluate these numbers in light of what the present plan allows and the EPRC can reasonably expect of these zones and designations in the light of past experience. to do that , consider a Scenario D as follows:

1. Village Commercial (VC) and Marina zones develop 5% residential and 95% commercial, about what has occurred over the past decade.
2. Village Institutional/Residential (VI/R) develops 75% residential and 25% commercial, again about what exists.
3. Residential zones, ER1 etc., develop 95% residential and 5% other uses, again about what has historically occurred.

In other words, what may reasonably be expected under current land use designations. Attached is that tabulation under the present LCA methodology. Note that the qualifying "factors" for public use, recreational use and market factor are unchanged and are added, not multiplied, together.

The result is a capacity of 239 units to meet a demand for 252 units, a shortfall of 13 units. Commercial capacity works out to be 455,253 compared to 594,362 previously reported.

In allevents, scenario D, or something like it, seems a far more reasonable "scenario" upon which to evaluate whether Eastsound meets the requirements of Growth Management.

None of the above deals with the basic innumeracy of adding the various factor instead of multiplying them nor does it reflect the factors themselves particularly the recreational use factor, 35%, to reflect a 200% recreational development reality. On the principal of confining my communications to one subject and one page, I will make that case in another message.

John Campbell
360-376-2035

specifically, that Eastsound has sufficient available land capacity for

	A	B	C	D	E	F	G	H	I	J	K	L
1	Scenario D											
2	Land Use	Gross Residential	Gross com'l	commercial		Gross residential	Gross commercial	Public	Market	Rec. home	Net res.	
3		capacity from	from Scenario A	multiplier	residential	capacity	capacity	use Factor	Factor	factor	capacity	
4	Designation	Scenario C	A		multiplier			5%	25%	35%		
5												
6	ER1	1.49			0.95	1.42		0.07	0.35	0.50	0.50	
7	ER1P	16.25			0.95	15.44		0.77	3.86	5.40	5.40	
8	ER2	37.22			0.95	35.36		1.77	8.84	12.38	12.38	
9	ER2P	45.45			0.95	43.18		2.16	10.79	15.11	15.11	
10	ER412	20.47			0.95	19.45		0.97	4.86	6.81	6.81	
11	ER4P	158.43			0.95	150.51		7.53	37.63	52.68	52.68	
12	VC	498.99	167,248	0.95	0.05	24.95	158,885.60	1.25	6.24	8.73	8.73	
13	M	62	311,966	0.95	0.05	3.08	296,367.70	0.15	0.77	1.08	1.08	
14	SLI	0			0	0.00			0.00			
15	EAD	0			0	0.00			0.00			
16	EN	0			0	0.00			0.00			
17	VR	519.12			0.75	389.34	455,253.30	19.47	97.34	136.27	136.27	
18												
19	TOTAL	1359.08				682.717				capacity	239	
20												
21		Required capacity from Housing Needs Analysis (Table 5.1, pg 8) is 252 units minus										
22		239 available equals a shortfall of 13 units under this scenario.										

Adam Zack

From: Fred Klein <freddythek10@gmail.com>
Sent: Tuesday, November 19, 2019 9:18 PM
To: Adam Zack
Cc: John campbell; Paul Kamin EWUA; Brian Wiese; Terry Gillespie; Leith Templin; Charles Toxey; joAn Mann; Rick Hughes
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.

Adam...while I may quibble with a couple of John C's reasonable expectations about future development in Eastsound, by and large, he is right on the money.

An important component of your analysis of development potential...something which I would heartily recommend to you...would be for you to engage directly with the current housing developers active in Eastsound who have current "in the trenches" experience with land availability, particularly for residential development (affordable or not) and include in your report their sense(s) of what's possible.

I would include OPAL, Homes for Islanders, John Miller, and Sean Demerit.

Best wishes,

Fred

On Nov 19, 2019, at 8:33 PM, jmc779@rockisland.com wrote:

Dear Adam,

Rummaging thru my records, I do not find that I have sent you my concern about the conclusions on page 2 of the November 2 Second Draft LCA. Specifically that the Eastsound UGA has sufficient developable land available for 472 dwelling units and 594,362 sf of commercial development. Leaving aside the issues of innumeracy and methodology, it simply isn't so. Each of those numbers is based upon a different, mutually exclusive "Scenario".

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The commercial capacity, 594,362 sf according to scenario A, assumes that the Village Commercial and Marina districts develop commercially to 100% of capacity. While this scenario is more plausible, it is incompatible with scenario C. The two scenarios are mutually exclusive alternatives. The scenarios do however provide some useful numbers of capacities to plan with.

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current Comp Plan Housing Needs Assessment, is 252 dwelling units. So, it is time to do some planning and evaluate these numbers in light of what the present plan allows and the EPRC can reasonably expect of these zones and designations in the light of past experience. to do that , consider a Scenario D as follows:

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In other words, what may reasonably be expected under current land use designations. Attached is that tabulation under the present LCA methodology. Note that the qualifying "factors" for public use, recreational use and market factor are unchanged and are added, not multiplied, together.

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Commercial capacity works out to be 455,253 compared to 594,362 previously reported.

In allevents, scenario D, or something like it, seems a far more reasonable "scenario" upon which to evaluate whether Eastsound meets the requirements of Growth Management.

None of the above deals with the basic innumeracy of adding the various factor instead of multiplying them nor does it reflect the factors themselves particularly the recreational use factor, 35%, to reflect a 200% recreational development reality. On the principal of confining my communications to one subject and one page, I will make that case in another message.

John Campbell
360-376-2035

specifically, that Eastsound has sufficient available land capacity for

<Scenario D.xlsx>

Adam Zack

From: Fred Klein <freddythek10@gmail.com>
Sent: Tuesday, November 19, 2019 10:00 PM
To: Comp Plan Update
Subject: LCA

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With regard to residential development potential within the existing boundaries of the Eastsound UGA, please include within the framework analysis interviews and resultant opinions and information with those entities which are currently active in residential development.

These entities should include OPAL, Homes for Islanders, and private developers John Miller and Sean Demerit.

Interview questions should include questions regarding perceived opportunities for residential development, affordable or otherwise.

Adam Zack

From: jmc779@rockisland.com
Sent: Wednesday, November 20, 2019 2:27 PM
To: Adam Zack
Cc: Paul Kamin EWUA; Fred Klein
Subject: AP#271143015, "split zoning"

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Adam,

This site is an anomaly in that it is "split zoned". The site has a 1/2 acre dogleg facing onto North Beach road that is zoned Eastsound Residential 4/ac. while the balance of the parcel is zoned SLI. Map 11A charts the entire parcel SLI.

Neither Eastsound nor SJ County has any special provision for split-zoned lots, deferred plan maintenance.

The County requires boundaries to follow lot lines or the centerlines of streets (UDC 18.10.040.C.1). Eastsound, like most urban areas, has them but no special rules apply. Towns prefer to have like uses facing each other across streets. When towns expand into rural areas as occurred here, that results in split zoned parcels. In Eastsound, Eastsound rules apply (see UDC 18.10.050(G)).

Map 11A shows the dogleg to North Beach Road as developable SLI and should, I believe, be developable Residential 4u/acre.

Adam Zack

From: Fred Klein <freddythek10@gmail.com>
Sent: Wednesday, November 20, 2019 12:14 PM
To: Adam Zack
Subject: Re: Land Capacity Analysis

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Adam...you could add Chris Dahl to your list of developers active in Eastsound...F.

On Nov 19, 2019, at 9:17 PM, Fred Klein <freddythek10@gmail.com> wrote:

Adam...while I may quibble with a couple of John C's reasonable expectations about future development in Eastsound, by and large, he is right on the money.

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John Campbell
360-376-2035

specifically, that Eastsound has sufficient available land capacity for

<Scenario D.xlsx>

Adam Zack

From: Adam Zack
Sent: Friday, November 22, 2019 9:05 AM
To: 'jmc779@rockisland.com'; Paul Kamin EWUA; Fred Klein; Rick Hughes
Subject: RE: Land Capacity Analysis and moving targets

Hi John,

Thank you for taking the time to dig in to the Land Capacity Analysis Report. If you have comments on the second draft of the LCA Report, please send them to compplancomments@sanjuanco.com by December 2, 2019. If the EPRC would like to provide comments on the second draft of the LCA Report, they can do so during the comment period.

Table 1 on page 2 shows the residential capacity from scenario C, where all mixed-use areas develop with 100% residential. This number is 471 not 472, it looks like there is a minor typo in Table 1. This kind of comment on the report is useful. Table 40 on page 77 (screenshot below) shows the same capacity number for Scenario C. The capacity for 245 dwellings is from development Scenario A, a different scenario than the one shown in Table 1 on page 2.

Table 40. Eastsound Capacity Summary.

Scenario	Final Residential Capacity	Population Capacity	Projected 2036 Population	Excess/shortf by Population
A. Mixed-Use Develops 100 Percent Commercial	245	501	514	
B. Mixed-Use Develops 50 Percent Split of Commercial and Residential	300	612	514	
C. Mixed-Use Develops 100 percent Residential	471	960	514	

Source: Table 18 of this report.

Table 41 on page 78 shows the residential capacity for Scenario B where mixed-use develops with a fifty percent split of residential and commercial development, as explained in the notes of that table. You will notice that the capacity number is consistent from Table 40 to Table 41. See screenshot below.

Table 41. Gross and Final Residential Capacity in Eastsound Residential Land Use Designations.

Land Use Designation	Gross Capacity	Final Capacity	Population Capacity
ER1	1.49	0.52	1.0
ER1P	16.25	5.69	11.6
ER2	37.22	13.03	26.5
ER2P	45.45	15.91	32.4
ER412	20.47	7.16	14.6
ER4P	158.43	55.45	113.1
VC	68.95	24.13	49.2
SLI	-5.00	-5.00	-10.2
M	4.56	1.60	3.2
VR	519.12	181.69	370.5
Total	867	300	61

Notes:

1. Residential capacity for mixed-use designations shown here from Scenario B, assuming that mixed-use develops with fifty percent commercial and fifty percent residential.
2. Final capacity includes the reductions for the public use (five percent), market (twenty-five percent), and seasonal home (thirty-five percent) factors (sixty-five percent total).
3. Residential capacity shown for the VC and M land use designations is from development Scenario B, where mixed-use districts develop with fifty percent commercial and fifty percent residential.
4. SLI has a negative value because five dwelling units in this area would be re-developed for commercial or industrial uses.
5. Population capacity is the number of people that could be housed in the final dwelling unit capacity. This assumes rate of 2.04 people per household.

The final capacity numbers from these tables are also consistent with the final capacity shown in Table 18, beginning on page 46. We will consider the results for all three of the development scenarios. Remember, the Land Capacity Analysis will be considered with other technical memoranda (i.e. the Housing Needs Assessment, the Capital Facilities Inventory, etc.) when the Council discusses land use issues in Eastsound. That policy discussion will take place during the review of the Land Use Element, expected to begin in the coming months.

I hope that clears everything up for you. I will be on Orcas the afternoon of December 4 if you would like to schedule a time to meet so I can answer your questions about the Land Capacity Analysis or the Comprehensive Plan update process.

Thanks,
 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.

From: jmc779@rockisland.com <jmc779@rockisland.com>

Sent: Thursday, November 21, 2019 7:55 PM

To: Adam Zack <adamz@sanjuanco.com>; Paul Kamin EWUA <pkamin@rockisland.com>; Fred Klein <freddythek10@gmail.com>; Rick Hughes <starwave96@hotmail.com>

Subject: Land Capacity Analysis and moving targets

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Dear Adam, As I continue to work my way thru the November 4 LCA I am surprised to find that the "Final" residential development capacity is a moving number. On page 2 it is **472** units, on page 77 it is **245** units and on page 78 it is **300** units. In each case the capacity results from following a different scenario. What is happening here? (The basic unadjusted target is 252 units.)

Which number are we to plan upon? Clearly it all depends on the scenario. How is it imagined the County will determine whether there in fact exists sufficient capacity for projected growth? Since all depends upon the scenario, will you and EPRC put your heads together and draw up a probable or estimated scenario based on historic experience?

.....JMC