

Sophia Cassam

From: tina@sanjuans.org
Sent: Wednesday, July 7, 2021 11:30 AM
To: Comp Plan Update; Sophia Cassam
Cc: 'R. Brent Lyles'; Cindy Wolf; Jamie Stephens; Christine Minney
Subject: annual docket comments- build out analysis
Attachments: FSJ cmt ltr re build-out analysis_7_7_21.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.

Dear Sophia,

Attached please find comments from Friends of the San Juans on the annual docket build out analysis request. Thank you for passing these along to the planning commissioners in advance of the July 16 hearing and for your consideration.

Regards,

Tina

Tina Whitman, MS | Science Director | Friends of the San Juans
(she/her/hers) PO Box 1344 | Friday Harbor, WA 98250 | 360.298.7616

www.sanjuans.org | [donate](#) | [facebook](#) | [e-news](#)



Friends *of the* San Juans

360.378.2319
www.sanjuans.org

P.O. Box 1344
Friday Harbor, WA 98250

By Email

July 7, 2021

San Juan County Planning Commission
c/o Sophia Cassam
SJC Department of Community Development
PO Box 947
Friday Harbor, WA 98250
sophiac@sanjuanco.com

Dear Planning Commissioners,

I'm writing to provide supplemental comments about Request No. 21-0003 of the County's 2021 Annual Docket ("Docket") and to request that you accept that docket request. As noted in our June 14, 2021 comments, we support what has been characterized by the applicant as a build-out analysis – we believe that a countywide assessment of resource availability to meet full development of the islands would assist in planning for future growth in the islands. The recent heat wave and regular anecdotal reports of wells running dry in the summer further supports a review of our community's projected transportation, energy, drinking water, food supply, housing, and other needs. For efficiency and consistency, and to promote well-informed planning decisions, we request that such review be conducted as part of the Comprehensive Plan update. To be clear, we appreciate that this request can be fulfilled only if the County devotes significant staff time to the project. However, there is broad popular support for this effort, and we anticipate that this initial investment of time will save a substantial amount of time and funds down the road because it will allow the County to plan in advance for potential resource limitations, rather than responding after-the-fact. Thus, we ask that you override the staff recommendation and approve the build-out analysis proposed by Request No. 21-0003.

We have reviewed the July 2, 2021 staff memorandum recommending rejection of docket request 21-0003 and understand that the Department of Community Development ("DCD") may believe it has already addressed the build-out request. While foundational information has been gathered during the Comprehensive Plan update, that information does not provide the level of detail needed to address the impacts of full build-out. The following portions of this letter: (1) identify continuing flaws in the 2019 Land Capacity Analysis; (2) contrast the limitations of existing reviews with the scope of information requested by the build-out analysis; and (3) request that the proposed analysis be conducted during the current Comprehensive Plan update.

A. Land Capacity Analysis flaws.

On November 4 2019, DCD issued a revised Land Capacity Analysis Report (“LCA”) that projected San Juan County’s ultimate: (1) housing capacity; and (2) commercial and industrial development by square footage. To reach its final tally, the LCA did not take the logical approach of identifying the number and size of developable parcels in each of the land use designations and then divide parcels larger than minimum densities by the minimum density. Instead, the process used an artificial calculation based on the overall acreage in each designation category and assumptions that included the following: (a) that the square footage of critical areas should be removed from the developable area, (b) that the density for developing rural farm forest parcels would be 5 acres, and (c) that the development of the San Juan Valley Heritage Plan Overlay would not significantly change the capacity results. The LCA did not attempt to evaluate the impacts of its projected development on local resources or services.

The process and assumptions above likely resulted in undercounting the amount of development that the County’s current designations allow. First, the LCA incorrectly assumes that development will not occur in critical areas. The error in this assumption is illustrated by the fact that the County’s critical areas ordinance expressly allows development in critical areas through its reasonable use provision and exceptions that allow various elements of development in critical areas and buffers. Moreover, even if development were fully prohibited from critical areas, a substantial amount of development can occur on parcels with critical areas as long as the development occurs outside the critical area and buffer. Removing the full acreage of critical areas from the development calculation would make sense only if the critical area and buffer were the exact same size and configuration as a parcel and no reasonable use exceptions applied

Second, a parcel designated rural farm forest may be developed even if it is smaller than 5 acres. Thus, dividing the total rural farm forest acreage into 5-acre increments undercounts all of the parcels smaller than 5 acres that will be developed.

Third, the LCA should tally the amount of development that would occur in the San Juan Valley Heritage Plan Overlay district. That designation authorizes doubling density from 10 acres per dwelling unit to 5 acres per dwelling unit across hundreds of acres of land. While some of that land has already been subdivided, and other areas are currently owned by conservation entities, those circumstances may change over time and significant parcels may yet be subdivided.

As we noted in 2019, these changes should have been incorporated into the LCA, and DCD’s justifications to the contrary did not address the underlying flaws.

B. The Build-Out Analysis Seeks Information That Has Not Been Prepared.

The July 2nd staff report states both that Request 21-0003 would be a resource-intensive project and that it was resolved in the 2018 and 2019 docket resolutions and is being fulfilled by the ongoing Comprehensive Plan update. Friends agrees that it would require a significant effort, but maintain that conducting the review while there remains time to plan in light of its results would ultimately save time. And to the extent that the build-out analysis seeks information about water availability, transportation needs within and to the San Juans, projected energy needs, the soils' capacity to handle septic waste, emergency evacuation needs, health care needs, waste management, food supply, and housing needs for our community, the Comprehensive Plan update and 2018 and 2019 dockets have not addressed it.

While the staff report suggests that existing documents address much of the build-out analysis, a simple review of the report reveals otherwise. For example, the limited 20-year timeframe used for capital facilities, transportation, and housing needs (now 15 years, because the Comprehensive Plan update scheduled for 2016 uses 2036 as its forecast date) does not contemplate full build-out. In addition, the capital facilities section speaks to public facilities, not the capacity of the land to accommodate distributed rural and suburban development and its individual septic and water systems. The staff report refers to level of service standards for roads, but does not address access to the islands. The housing needs analysis does not appear to address housing that meets our community's urgent need for additional affordable housing. And while the draft Water Resources element of the Comprehensive Plan speaks to monitoring and measuring freshwater use, we have not seen evidence that the County has proposed a viable system to do so. Currently, landowners must install water meters on new wells, but need not maintain them or report water use. In addition, the Water Element does not attempt to evaluate the amount of water likely to be used at full build-out and compare it to the amount of water that would be available in the various neighborhoods that comprise the San Juans.

The staff report is silent regarding issues like septic waste, evacuation needs, food supply, and health care. An analysis of our islands' capacity to address the community's full needs at build-out would be invaluable for planning for that build-out. We are fortunate that the finite amount of land that exists in these islands renders that analysis manageable.

C. The Build-Out Analysis Should Be Conducted Now To Inform the Comprehensive Plan Update.

Along with a sizeable contingent of our fellow neighbors, we ask that the Planning Commission add Request 21-0003 to the Comprehensive Plan docket and that it prioritize the County's analysis of the islands' capacity to support our community at full build-out. As our public representatives, you are in a position to ensure that we make the best-informed

decisions about future development possible. We entreat you to accept that responsibility and to exercise your authority to ensure that can happen.

Thank you for your consideration. We welcome any questions you have.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Brent Lyles", with a long horizontal stroke extending to the right.

R. Brent Lyles, Executive Director