

## Sophia Cassam

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**From:** joe symons <joesymons@me.com>  
**Sent:** Thursday, September 23, 2021 3:41 PM  
**To:** San Juan County Council; Sophia Cassam  
**Cc:** Brent Lyles; Janet Alderton; Heather Nicholson  
**Subject:** Comments regarding docket 21-0003 submitted in advance before the 28 Sept 2021 Council Meeting  
**Attachments:** Docket 03 CC ltr 23 sept 21.pdf

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I attach a pdf file of my comments to Council re Docket 21-0003. Please distribute to Council and staff.  
Thanks

Joe Symons  
Olga Wa

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[KeepSanJuansWild.org](http://KeepSanJuansWild.org)

To: San Juan County Council  
From: Joe Symons, Olga WA  
Date: 23 September 2021  
Re: Docket request 21-0003

Thank you for giving me the opportunity to express my thoughts regarding Docket 21-0003. As you know, "03" requests the county to add essential information to the Comprehensive Plan update currently in process.

San Juan County, comprised exclusively of islands, has transitioned from a century-long stable population of less than 4000 residents to a population over 17,000, i.e., over 4 times larger than its historical average, all in the last 50 years.

The county created its first comprehensive plan in 1979. In 1992, pursuant to the recently enacted Growth Management Act, the county chose to re-write the comp plan under GMA guidance and principles. Citizen committees were chosen to shape the plan; these committees were given broad authority, tho they were prohibited from discussing density. Density refers to the assignment of minimum parcel sizes required for each residence. A discussion of density would have required the calculation of what the buildout potential was, based on the 1979 density designations. Buildout refers to how many residential structures, and thus how many people (at the historical average of 2 people per residence) could live in the county if it were fully developed, i.e., at which point there would be no more land available for residential development.

A buildout analysis would, in its very simplest form, be a calculation of how many people could live in the county when every parcel was subdivided to its maximum legal capacity and a 2 person household were living on it. San Juan County has been asked via docket requests submitted multiple times over the past 20 years to perform such a calculation. The county has consistently refused to do this work.

How much work is involved to "run the density numbers"? Given that all county data is now available in electronic form, calculating the buildout population can be done within a few hours (that would be for understanding the data and preparing the system) and within a few seconds once the "start" button is pressed on the computer. Anyone can obtain the data from the county, as I have done.

The maximum buildout population is over 130,000 should every parcel be developed to its maximum legal potential. The data to make this calculation is available at DCD and has been made available to you and to the public for many weeks. Most recently, the data was submitted to you in my letter of 9 september 2021 and available at <http://doebay.net/sunshine/Docket03lettertoCC.pdf>

It should be noted that the buildout calculations have been made available to county staff, commissions and council for months. No one from any county office has contacted me to challenge, or even ask, about how I derived the buildout population. A reasonable person could assume that by not challenging the numbers, the county has

accepted them. Surely if the county felt the numbers were seriously in error, it would have made some attempt to correct the record. It would appear that rather than challenge my calculations, which would demonstrate that the county knows how to run the numbers and found my work faulty, the county took the strategy of hoping no one else would notice and that I could be marginalized as a sole disgruntled resident who has been pestering the county for years with an inconsequential topic.

County staff, commissions and council have been aware of the request for a buildout analysis since 2000; such an analysis would not only provide a maximum theoretical population, but **assess the impact** of that population: such impacts would include, but not be limited to, taxes, carrying capacity (roads, water, ferries, power, emergency services, housing, etc.), and community values as expressed by the GMA-required Vision Statement.

Given the official docket submissions, the question to be asked is not “what is a buildout analysis?” but “why has the county refused to perform one?” No one can claim they don’t understand what it is. A buildout analysis is not some brand new untested concept, like airbnb, uber, or door dash. It is a fundamental informational component that any competent jurisdiction would have to have in its planning tool box.

We know that DCD must have some idea of what the county’s buildout could be as inferred by the May 10 2021 email from Council member Wolf, describing her conversation with Erika Shook, at that time the head of DCD. Cindy wrote:

“Erika explained this to me and that there were few remedies short of vacating the plat and potentially bankrupting the county with lawsuits. Everyone believes you because you are correct. No one seems to know what to do about it. My head is still swimming from figuring this out three weeks ago.”

The only reasonable explanation for why the county has consistently refused to perform this simple calculation and make it public is that the county *does not want the public to know that it knows what the buildout population potential could be*. Why? Because if the county makes that number public, it would expect a considerable political backlash.

Why would that be? Because the public imagines that what they experience here in the county is how it will “always be”. No one moves here for jobs. The choice to live here is based on its rural qualities, and as the population grows, those qualities, those special energies that draw people here and keep them here, degrade. The process has seemed slow: the analog is the frogs in a pot of cold water that is put on the stove. The process has accelerated in the past few years to the point that the vacation rental visitor increase, a form of increased population, has become too invasive and disruptive to ignore.

As a former council member said, regarding the possible implementation of a vacation rental moratorium, “Why would we impose a moratorium? Then we would have to **do something**.” Docket 03 would, if approved, ask the county to do something that should have been done 30 years ago, something critical for the beneficial future of all living entities in the county.

To claim that it will slow down the completion of the comp plan, now already 6 years overdue, is a red-herring. Yes it might take more time and resources, and yes it is possible, probable, and appropriate that a public/private partnership could be established to fund a professional consultant to assist in coordinating and performing a true buildout and impact analysis.

But more than anything, the point of a BOA/Impact analysis is to ensure that the county’s Comp Plan Vision Statement, the foundation of the plan, it’s “north star” as it is described in the Introduction to the comp plan, isn’t just some sweet-sounding window dressing on a plan that, by refusing to even reveal, much less discuss, the legally baked-in population maximum, is made moot and becomes a mockery of the aspirations and financial/emotional investments that current residents have made with the expectation that the Vision Statement—a required GMA comp plan component—is in fact being operationalized and honored.

Refusing to certify that the Vision Statement is honored by refusing to reveal how unlikely that honoring and respect would be, given the never-discussed density map, is a betrayal of the trust that has been assigned to Council by the residents of the county.

Step one, then, is to simply run the numbers. That will cost the county nothing in terms of time and money. Those numbers must be done soon and made public, showing that the county has the desire and the smarts to do it.

The next step, should the county take 03 seriously, is to work with local stakeholders to craft a true buildout/impact analysis process, involving professional consultants and a public engagement process that fully and honorably provides extensive opportunity to shape the process by which the analysis, its conclusions, and recommendations can be brought into alignment with the Vision Statement **and codified into law**. By so doing, the county avoids the exposure to a GMA Comp Plan challenge regarding inconsistency between the vision statement and the density map implications.

This would be a win win for everyone. This can be done and should be done.

Whether you can or can’t support 03, your official duties and public concerns oblige you to tell us why.

## Essential takeaways:

- A buildout analysis would, in its very simplest form, be a calculation of how many people could live in the county when every parcel was subdivided to its maximum legal capacity and a 2 person household were living on it.
- San Juan County has been asked via docket requests submitted multiple times over the past 20 years to perform such a calculation. The county has consistently refused to do this work.
- The work required to simply calculate the maximum buildout population, given the resources available, would take competent staff less than half a day to calculate.
- Preliminary SJC buildout population based on the reasonable use standard (a single family residence or SFR) is over 130,000; this number does not include increases due to ADU's nor does it include the impact of visitors.
- The only reasonable explanation for why the county has consistently refused to perform this simple calculation and make it public is that the county *does not want the public to know that it knows what the buildout population potential could be*. Why? Because if the county makes that number public, it would expect a considerable political backlash.
- The point of a BOA/Impact analysis is to ensure that the county's Comp Plan Vision Statement, the foundation of the plan, it's "north star" as it is described in the Introduction to the comp plan, isn't just some sweet-sounding window dressing, a sugar-coated poison pill.
- By refusing to even reveal, much less discuss, the legally baked-in population maximum, the comp plan is made moot and becomes a mockery of the aspirations and financial/emotional investments that current residents have made with the expectation that the Vision Statement is in fact being operationalized and honored.
- The appropriate means of proceeding with 03 is to work with local stakeholders to craft a true buildout/impact analysis process, involving professional consultants and a public engagement process that fully and honorably provides extensive opportunity to shape the process by which the analysis, its conclusions, and recommendations can be brought into alignment with the Vision Statement and **codified into law**.
- Council must thoroughly and clearly express its reasons for whatever decision it makes regarding docket 21-0003. Comments by Council to date do not meet this standard.