

To: San Juan County Planning Commission and County Council

From:

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Re: Population Projection Comments from Symons

I have several concerns regarding the current SJC Comp Plan update process. Overall, I believe the county is missing the forest for the trees, as I will explain below. I do not wish to waste your time, nor do I wish for you to be spinning your wheels reviewing material that is, at a strategic level, of marginal value.

As background and as a reminder, I have notified you in earlier correspondence this year, of my formal request, 16 years ago, to the then Planning Commission, regarding Comprehensive Plan modifications as permitted by law. The request was not for a change in any aspect of the CP, but simply to ask for a "truth in planning" document. You can read that request at

doebay.net/forthcoming.html

The Planning Commission duly processed my request and unanimously recommended that it be given the highest priority of county governmental activity. You can read their finding here:

<http://www.doebay.net/SJCPCfindingsOct2001.pdf>

For the record, this recommendation was ignored by the then BOCC.

With regard to the current information provided by DCD regarding population forecasts for SJC for the 20 year planning period, I am concerned about the following topics.

1. Understandably, forecasts are based on extrapolation of past trends. Under many circumstances, this is a reasonable approach. However, there are a number of reasonable and predictable non-linear and unprecedented regional, national and global disruptions that may well impact SJC over the planning period that could significantly change the actual population of the county. While some of those disruptions would dramatically lower the actual population of the county (economic recession, cascadian subduction), many of them could easily significantly increase the actual population: climate and wealth refugees, significant tourist and second home

pressure from the high tech (read: high income) growth in Seattle, and other lifestyle factors (such as the ones that brought you here in the first place).

Consequently, the actual residential population growth in the county could be significantly higher than the one chosen by DCD. This is not to criticize their work. I am asking you to think and look strategically, which is to say, outside the box. The box is changing.

2. There is no GMA-based requirement to consider the population impact of visitors. Decades of experience and revenue data demonstrate that the summer peak-season population of the county more than doubles. While these visitors could be family members, part-time homeowners, tourists, contractors, service providers, campers, etc., their short term status is effectively irrelevant: they are people. People consume water, require septic services, use the roads and ferries, park, fill restaurants, hike on trails, require housing, food, etc. just as full time residents do. Infrastructure therefore needs to be constructed and/or adequate to meet the actual population needs, not just the residential population needs. If all those visitors just showed up for one wild long insane weekend, where every kind of existing infrastructure was dramatically overloaded but it was just for 2 days, then maybe everyone here would shrug their shoulders, be thankful for the \$ that poured in, be glad that it was over, and get on with their lives. But the visitor population bump is continuous. It is not an annual one-off weekend. It is a several month long tsunami. The county has to be prepared to accommodate it and, more importantly, recognize that it will increase, not just for the 20 year planning horizon, but in perpetuity.

3. The Department of Commerce, which administers the Growth Management Act, does not review any county's CP for compliance with GMA. Whatever growth forecast SJC chooses, including any forecast greater or less than the OFM high or low options, is not going to be reviewed by the State. Further, whatever growth rate and 20 year population forecast is chosen, and consequently whatever UGA minimum "expected" availability that should be provided to meet that growth is determined, can and most likely will have no bearing on where either resident or visitor populations actually "settle". While SJC could dutifully provide a minimum of 50% space in UGA's to meet GMA, (or not), there is again no State review of the CP. More importantly, if new residents (and new tourist facilities) are created in rural areas at a rate greater than 50% of the expected ("planned") growth, in violation of GMA principles, there is no State review or, more significantly, no negative GMA consequences to SJC for these "market driven" choices.

San Juan County has no regulations mandating or directing that a minimum of 50% of the residential building permits (or transient rental permits for that matter) must be in UGA's.

My points are simple. It does not really matter what the population projections are, in spite of the very careful work done by DCD. They are irrelevant to actual on-the-

ground decisions. There can be more, perhaps much more, population moving in to SJC than is projected, and they can move anywhere at any time (there is no mandatory cap on the number of building permits issued per year consistent with a thoughtful planned growth rate and associated infrastructure). Given the significant impact of visitors, whose residential location on any island has zero bearing on residential population GMA location mandates (e.g., 50% or more in UGA's), the OFM residential population forecasts, which presumably would have some significant bearing on the adequacy of public facilities and services, are speculative, inadequate and, absent any regulatory guidance, irrelevant.

DCD and you, the PC, are "going through the motions" of what someone has determined is an acceptable process to update the CP. The Department of Commerce really doesn't care, or if they do, they can't do anything about it. The only enforcement of any of GMA principles comes from a successful lawsuit against the county by someone who has standing. This enforcement is onerous for all parties and does not necessarily resolve the dispute. Unfavorable Growth Management Hearings Board rulings simply say "you didn't do it right; fix it and come back and show us what you did." They do not specify how to fix it.

Having been through this process once before, from participating in the construction of the current CP to litigating it (and winning most of the cases), I can speak from experience that this is not a wise or intelligent scenario.

Essentially irrelevant questions are being asked while the right questions are being ignored.

Virtually no one in the county has a clue what the current CP "says" and "means", including DCD, PC and CC officials. Focusing on a 20 year update is foolhardy if no one knows what buildout means in all its dimensions. Updating an unknown, undiscussed and (from a first approximation) absurdly undesirable CP is a betrayal of public trust and a waste of precious county and citizen resources.

I recommend that you table the conversation about 20 year population projections and instead ask DCD what the buildout population is, how the impact of visitors impacts county resources during the period from now to buildout, what all this will cost in dollars and in extremely valuable but less easily measured quality of life indicators (which, after all, is why residents stay and visitors come), and get this information out to the public for a comprehensive conversation before you simply lock step forward.

In short, I recommend you insist that the recommendations of your predecessors, cited above, in 2001, to create a clear, unambiguous, comprehensive "truth in planning" document showing the evolution of the county in all relevant aspects (population, taxes, infrastructure, services, carrying capacity, impact on environment, etc.) be renewed and passed forward to the County Council with the same urgency as was specified 16 years ago. This recommendation followed on the

heels of the county-funded 2000 "[Study of Socioeconomic Impacts of Growth Pressure in Selected Seasonal/Resort Communities](http://www.doebay.net/appeal/socioeconomicgrowth.pdf)" (http://www.doebay.net/appeal/socioeconomicgrowth.pdf)report which demonstrated direct parallels between SJC and well known east coast island communities and had specific suggestions for how to avoid this trajectory. The study recommendations were ignored. That this study is nowhere mentioned or included on the SJC web site is almost shameful.

Right now, with minor adjustments due to certain regulatory requirements (such as the CAO and other rules), anyone can build almost anything almost anywhere at any time in SJC. There may be a plan, but it is effectively useless and toothless. It is not a "plan". It is a collection of information that has no bearing on GMA principles, on actual carrying capacity, on sustainability, on the vision statement, and on behavior.

It is your job to call this out and correct it.