Adam Zack

From: joe symons <joesymons@me.com>
Sent: Wednesday, October 23, 2019 11:58 AM
To: Comp Plan Update
Cc: Jennifer Barcelos; Stephanie Buffum
Subject: Correspondence regarding LCA / GDLI calculations

I submit the following email exchange to the county to ensure that the information and comments are part of the record regarding LCA, GDLI and buildout issues, pursuant to page 5, lines 25-26, of https://www.sanjuanco.com/DocumentCenter/View/18995/2019-09-09_DCD_LCA_draft_capacity_Rep_AZ_PCCC_09-2019?bidId=, i.e., the memo from DCD to Council and Planning Commission regarding the LCA Report briefing.

In particular, I draw your attention to the description of the calculation of buildout, described in the email from Adam Zach on 8 October 2019, to wit:

> The parameters for calculating the capacities shown in the report are all spelled out in the Land Capacity Analysis Methodology (LCA Methodology), included as an appendix to that report. Gross residential capacity is calculated as follows:
>
> > (Net developable acreage X comp. plan assigned max. density) – (existing and pending dwelling units) = residential capacity.
>
> You will not be able to calculate this using the GDLI data. The first term in the equation above is derived from the Net Developable Lands Inventory, which has critical areas and other areas with limited development potential removed from the GDLI, as provided in the LCA Methodology.

The assumption here is that gross residential capacity is based on net developable acreage, and not on legally vested development rights. It appears that the resulting calculations would indicate a buildout capacity smaller than the legally vested rights of the land owner. For planning purposes, and for the 20 year planning horizon, this might be acceptable as an *estimate* of residential capacity. This forecast, or estimate, has nothing to do with what the landowners might choose to do. As you know, there are no limits on the issuance of building permits (or vacation rental permits) by island, land use, or any other criteria, so what you might estimate has little to do with what can actually occur.

Buildout calculations are not based on estimates or forecasts. They are based on what is legally permitted, which in turn is derived from the density map. Under a buildout scenario, there are no reductions in acreage for public use, market factors or seasonal/vacation use. Buildout by definition means if ALL parcels were developed to their **legally vested maximum development potential.**

It appears there is a disconnect between estimating possible residential potential (the LCA) and the actual legal rights of the land owners. I believe this distinction should be made clear.

Other assumptions that are insufficiently clarified: the whole thrust of this LCA methodology is that past treands are a good (indeed the only) indicator of future behavior. Given the enormous and increasing turbulance (read: unpredictable nature) of national and international economic and environmental impacts, this assumption is questionable. At least it should be made explicit. Ceteris Paribus doesn't do well here.

On the other hand, some behaviors are likely. One is the consequence of a very rapidly expanding Seattle metro area, both in terms of the numbers of people inmigrating and the amount of money that many of the intellectual property service workers are earning. If past behavior is any guide, the impact on the San Juans of this proximity of people and money means developmental pressure, either in terms of 2nd homes, possible full time residents, and certainly visitors. This accents the importance of the legal vesting of development potential, especially given no regulatory policies to guide, restrict or prohibit development. In addition, the actual on the ground consequences of the uncontrolled growth potential on carrying capacity issues such as water, ferries, septic, roads, schools, and other expensive infrastructure investments is not discussed anywhere. There are no "estimates" of the tax burdens, quality of life indicators, etc. that are associated with any of these forecasts, whether for just the 20 year planning horizon or for the legally vested parcels at buildout.

There is no commentary on whether either the 20 year forecast or the buildout potential meets the approved SJC Vision Statement, and if it does not, **why** it does not. Or if it does, how the county **demonstrates** that these increases in total population (not just full time residents which is what this entire LCA conversation is about) but part time property owners and visitors fulfill and meet the standard of the adopted Vision Statement.

Discounting the impact of 2nd homes (and vacation rental properties) by "market factors" and "seasonal use" factors entirely hides the fact that the development ignored by numerically discounting these factors nevertheless occurs. Those "seasonal use" homes are still occupied, still create infrastructure, environmental and community-cohesion costs, so waving them away as if they don't count appears specious. At least the conversation should acknowlege this. The single-minded focus on GMA 20 year "residential" planning based on past trends and excluding the massive impacts of non-residents should at least be explictly stated in simple clear language. The Cost of Community Services study done for SJC in 2004 (http://doebay.net/appeal/COCSReportExecSum51804.pdf) should be woven into the fabric of this conversation. More people (ie. residences, regardless of owner occupancy) means higher taxes, period. As SJC is at present entirely vulnerable to any growth level dictated by the market, and as the vast majority of investment in the county is for residential development, the current process all but guarantees a race to the bottom: higher tax obligations, lower quality of life, failure to meet the vision statement, dry wells, failed septic fields, even worse (if that is possible) housing non-availability, greater income inequality, and lower income for those owner-occupied VR permit holders who live in the county and depend on VR income to be able to live here.

Joe Symons
Olga Wa

Begin forwarded message:

From: Adam Zack <adamz@sanjuanco.com>
Subject: RE: Request for LCA / GDLI calculations
Date: October 9, 2019 at 11:49:40 AM PDT
To: 'joe symons' <joesymons@me.com>
Cc: Lynnette Wood <lnmiwood@gmail.com>, Erika Shook <erikas@sanjuanco.com>, "Timothy P. Blanchard" <tim@blanchardmanning.com>, Georgette Wong <georgette_wong@yahoo.com>

Hi Joe,

It sounds like you are using a different data set. Because you are not using the same data set, you are getting different results. The confusion stems from using different inputs to try and get to the same result. As I mentioned in the previous email, the capacity calculations are based on the Net Developable Lands Inventory (NDLI) data set, which stemmed from the Gross Developable Lands Inventory (GDLI) prepared over the course of this summer. If you use a different data set, you will get different results. The instructions I previously provided will help you check the math used in preparing the LCA. If you are trying to check the results while using a different data set, you will get different results.

Your comments about using acreage, removing areas with limited development potential, and how density is applied to arrive the capacity calculations are all directed at the assumptions used in the LCA Methodology. If you have comments on this document (Attachment A of the LCA report available here:https://www.sanjuanco.com/DocumentCenter/View/18995/2019-09-09_DCD_LCA_draft_capacity_Rep_AZ_PCCC_09-2019) please refer to the page and line number and send your comment to compplancomments@sanjuanco.com.

I think you may be commenting on the LCA rather than asking me a question about how the Land Capacity Analysis was prepared. If you would like to comment on the LCA, please send your comments to compplancomments@sanjuanco.com make sure you refer to the page and line numbers of the report linked to above. Please note, the comment period on the current draft report goes through October 25, 2019. Submitting your comments through the proper channels will ensure that they are appropriately filed and distributed to the Planning Commission and County Council.

For reference, the maximum FAR values were derived from the San Juan County Code, and are intended to provide for the maximum allowed development. A full description of how each maximum FAR value was calculated is provided on page 22 of the LCA Methodology, included with the draft report linked to above.

Please let me know if you have any other questions about how the draft Land Capacity Analysis was prepared. Make sure to send any comments you have on the LCA report or methodology to compplancomments@sanjuanco.com.

Thanks,

Adam Zack
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San Juan County, WA
360-370-7580
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From: joe symons <joesymons@me.com>
Sent: Wednesday, October 9, 2019 11:15 AM
To: Adam Zack <adamz@sanjuanco.com>
Cc: Lynnette Wood <lnmiwood@gmail.com>; Erika Shook <erikas@sanjuanco.com>; Timothy P. Blanchard <tim@blanchardmanning.com>; Georgette Wong <georgette_wong@yahoo.com>
Subject: Re: Request for LCA / GDLI calculations

Thank you for your careful explanation of how you derived the numbers shown in the LCA page 68 (pdf that I sent in my inquiry).

I am focussing only on rural areas.

The example you gave, an 84 acre parcel in Forest Overlay with an existing structure on it, would, in the world of "development capacity", be seen (by the owner anyway) as allowing for a maximum of 4 legal development (SFR) parcels should the single parcel be subdivided. Since there is already one du on the parcel, the owner could expect s/he could enjoy 3 additional du's for his/her land.

What I am sensing is a gap between legal subdivision potential and a more nuanced, but also more confusing, calculation based on acres (to the nearest hundredth of an acre) that would not necessarily represent the max legal development potential of any parcel. Taking acreage away from a parcel for wetlands or slopes does not mean the parcel has lost development potential.

It may be that your analysis methodology is of greater significance in activity centers, dealing with FAR's.

Using the spring 2017 Parcels database, which is what I believe you are using, containing 17201 parcels, (note: this SJC database has been modified by Dean Doughtery of SJPT to exclude all acreage that is covered by conservation easements) and sorting on land use RFF, I get 6883 existing parcels with, at buildout (this means all parcels are subdivided to their max based on the density assigned to that parcel), an additional development potential for RFF designated parcels of 4458 du's.

Table "Capacity" pg 62 LCA shows a gross residential capacity for RFF for the entire county of 3232 du's.

These numbers are so far off that I am unable to reconcile the difference. Clearly DCD did not do its work parcel by parcel, but used a aggregating methodology to create the LCA.

I have compared "my" density designations assigned to each parcel (by combining a pile of SJC datasets; this work was done in 2017 and 2018) with the GDLI density designations (which came out in summer 2019). They are identical. I have run the numbers on total "capacity" based on each of the 6 categories (0 to 5) of the GDLI. I know you don't mess with the town of FH, but the parcel data is county wide, so data on all parcels (specifically density data) is available. The buildout potential for FH is so far off the charts that the impact of this on overall county buildout has to be looked at with considerable scrutiny. However, since I'm looking at rural lands only, this anomaly is not on my todo list today.

Any assistance you can offer me as to how our analytical methods looking at precisely the same data could be so far off would be appreciated.

From a big picture perspective, I believe the fundamental LCA methodology may be appropriate for activity centers given the FAR considerations, tho even there much massaging is likely. That said, I think the methodolgy does not appear to consider legal maximums. DCD may be using "best practices" among national planning standards in its LCA methodology but in reality at buildout there will be no market factor and absolutely no discount for vacation/partial

use/recreational du's. If a parcel has a du, at buildout it will be used, or in all cases it is legally available to be used (i.e., developed). State and County regs require certain water and other resources be met AS IF a du were occupied full time. Common sense reveals that "recreational use" structures are basically fully occupied in peak season months. Discounting these structures as if they didn't exist distorts the infrastructure requirements that the county is obligated to supply, and thus the costs to be incurred. Further, none of these calculations speaks to the impact on the community, on the vision statement, on carrying capacity topics.

In short, the calculations seem to seriously under-represent the actual number of structures that could be built in the county at any time, not just at a theoretical buildout. The LCA also does not address the impact of visitors. Given super-user-friendly visitor booking platforms like airbnb, many of what otherwise might have been "empty" recreational homes are now not empty: they have become businesses hiding under the current presumption that they are recreational use, or, worse, that as far as the LCA is considered they "don't exist."

Granted, "life" is complex. One can never get a precise answer to almost anything. Everything is a moving target. But the number of parcels and the number of acres in SJC are not rapidly moving targets. Acres are pretty fixed, and save for subdivision potential (of which there's a fair amount sitting there in the legal books), the number of parcels is not untrackable or unpredictable. I should think we could be close enough (i.e., to a first approximation) on how the number of parcels, in rural areas of the county, by land use category (RFF, RR, etc.) are calculated to be able to move to the next steps, which are: what's this look like? what will this cost? is this consistent with the vision statement? Do we have sufficient critical resources (e.g., water, septic, ferry, roads, etc.) to meet this projection? Does this portrait, presumably transparently and clearly articulated to the public, meet the deeply felt public interest?

It has been extremely informative, and discouraging, to note that 3 separate efforts over the past 20 years to get DCD and CC to authorize a "full disclosure" portrait of what this county will grow into, based on existing legal vesting, has been consistently disregarded. If one rules out incompetence on the part of professional planners in DCD, the obvious question is: why don't we know what is really going on? is there something to hide? Who benefits from silence? Please note I take no umbrage at DCD, tho I am discouraged at DCD's recommendation to PC re my 2019 docket request.

Step one: let's get the numbers right. Step two: let's really talk about what they mean.

Joe Symons

On Oct 8, 2019, at 3:30 PM, Adam Zack <adamz@sanjuanco.com> wrote:

Hi Joe,

Yes, the capacity shown in the table you provided is based on the maximum allowed floor area ratio as described in San Juan County Code and the maximum allowed density as designated on the Comprehensive Plan Official Maps.

The parameters for calculating the capacities shown in the report are all spelled out in the Land Capacity Analysis Methodology (LCA Methodology), included as an appendix to that report. Gross residential capacity is calculated as follows:

> (Net developable acreage X comp. plan assigned max. density) – (existing and pending dwelling units) = residential capacity.

You will not be able to calculate this using the GDLI data. The first term in the equation above is derived from the Net Developable Lands Inventory, which has critical areas and other areas with limited development potential removed from the GDLI, as provided in the LCA Methodology.

If you would like to submit a public records request for the Land Capacity Analysis data for the subsequent steps, you can do so here:https://www.sanjuanco.com/349/Public-Records-Request

You may find it easier to review the results as presented on the online Land Capacity Analysis web map. If you have the gross capacity layer turned on, you can click on a given parcel and the pop up will show the relevant data. The web map is much easier to navigate than the overall data set and it is all the same information. The web map is available here:https://gis.sanjuanco.com/LCA_Inventory/

For example:

When you get to the web map, open the layers list (blue circle) and turn on the gross maximum capacity layer (red underline).
<image001.png>

Once you have the capacity layer turned on, navigate to a parcel of interest and click on it. That parcel's relevant data will come up in the pop up window. Multiply the NDLI Acres (red underline) by the density value (blue underline) and subtract the existing dwelling units (yellow underline). See below:
<image002.png>

> Capacity = (84.87 acres * 0.05 density) – 1 existing dwellings
> Capacity = (4.2435) – 1
> Capacity = 3.24

Performing the calculations on the overall data set is fairly complicated, particularly once you get to the commercial capacity calculations. The web map is provided to make reviewing the results and checking the related math easier than wrestling with a large data set without the software tools used to perform the analysis.

Please note: rounding to whole numbers for each parcel's capacity will produce a different total than what is provided in the sheet you included with your last email. Rounding was not included in the LCA Methodology and was not used in the related calculations. For example, the capacity listed for the parcel I included above is 3.24 dwelling units, not 3 or 4.

Remember, if you have a comment on the Land Capacity Analysis, please send it to compplancomments@sanjuanco.com. Let me know if you have any other questions.

Thanks,
Adam Zack
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adamz@sanjuanco.com

From: joe symons <joesymons@me.com>
Sent: Thursday, October 3, 2019 5:31 PM
To: Adam Zack <adamz@sanjuanco.com>; Erika Shook <erikas@sanjuanco.com>
Cc: Lynnette Wood <lnmiwood@gmail.com>; Timothy P. Blanchard <tim@blanchardmanning.com>; Georgette Wong <georgette_wong@yahoo.com>
Subject: Request for LCA / GDLI calculations

Thank you for all the work you have been doing on the LCA / GDLI.

I attach page 68 (in the pdf file), page 53 in the report, which I understand shows the rural capacity "at buildout"

first, is my assumption that this table shows rural lands buildout capacity correct?

assuming so, I am unable to divine how you calculated column 2 in the spreadsheet below, the Gross Residential Capacity Dwelling Units.

In June I received from your office the GDLI spreadsheet, some 17240 rows.

I am at a loss as how you got any of the numbers in column 2. I can parse the spreadsheet for what I imagine are the filters you used, (but I don't know them), and come up with very different numbers. I have read up thru page 12 of the appendix (LCA Methodology) which covers assumptions for rural lands. My attempt at reproducing these relatively simple filters results in different numbers than what you got. Note I do not calculate to the nearest hundredth of a parcel's maximum development capacity. I calculate to the nearest whole digit. Thus if a parcel has 21 acres in R-5, I get 4 development "units", not 4.2, since a parcel owner can't "use" that extra acre for development purposes.

Your assistance most welcome.

Thanks

Joe Symons

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