

## Adam Zack

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**From:** Jan Alderton <janetmalderton@gmail.com>  
**Sent:** Saturday, January 23, 2021 12:37 PM  
**To:** Comp Plan Update  
**Subject:** Forest Resource Comments  
**Attachments:** JA\_CompPlan Updates\_Forest Resource Lands.docx; Deer Harbor Forest Resource.pdf

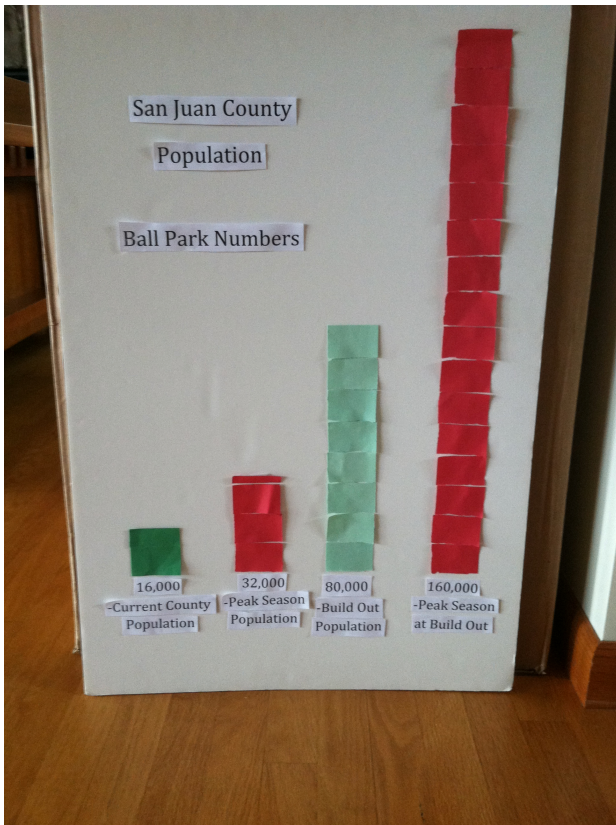
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Adam Zack,

Please find my comments and accompanying .pdfs related to the proposed changes to the Forest Resource Land criteria in the Comp Plan Update.

Thank-you for all your help with the links!

Janet Alderton  
Deer Harbor  
Orcas Island



January 23, 2021

Re: Comprehensive Plan Update  
-Proposed Changes for Forest Resource Lands

Planning Commissioners,

I am interested in preserving lands that are currently designated as Forest Resource as well as allowing additional parcels to be added to this designation.

I understand that the Growth Management Act requires Resource Lands to meet the following criteria:

- ♣ Natural resource land must have long-term commercial significance;
- ♣ The factors to consider when determining if the land has long-term commercial significance:
  - ♣ Natural resource land must not be characterized by urban growth; and
  - ♣ The land is used or capable of being used for resource production.

I would like the Planning Commission to consider specifically calling out the Carbon Sequestration by forest lands as having “long-term commercial significance”. Programs already exist to monetarily compensate forest lands because of their Carbon Sequestration benefits.

Carbon Sequestration is an invaluable resource provided by Forest Lands.

Because Climate Change threatens San Juan County (and our planet) in numerous ways, I think this addition of Carbon Sequestration as having “long-term commercial significance” for Forest Resource Lands must be recognized in our Comprehensive Plan.

There is second issue that I ask the Planning Commission to consider:

Will the proposed changes in the criteria for Forest Resource Lands trigger the loss of currently existing parcels from the Forest Resource designation? (Current criteria and the proposed criteria are copied at the bottom of my comments.)

Parcels that are currently designated Forest Resource Lands at the San Juan County Polaris website are indicated by a dark green color when the “Comp Plan” is checked as one of the displayed layers.

<https://www.arcgis.com/apps/webappviewer/index.html?id=39b87792947e40a5aa0fcb8af5910bd1>

Please see the attached .pdf of the Forest Resource Lands in the Deer Harbor region.

Many of the Forest Resource-designated parcels in the Deer Harbor region on Orcas Island do not appear to me to meet the existing or proposed requirements for Forest Resource designation. It is my understanding that many parcels in the Deer Harbor region were “grandfathered” as being Forest Resource designation when the original Comprehensive Plan was adopted.

Because the Forest Resource designation limits the residential development potential to one residence per 20 acres, I am concerned that the proposed changes to the Comp Plan will allow landowners to request their parcels be redesignated to, for example, Rural Farm Forest, that allows one residence per five acres instead of one residence per 20 acres.

The estimated buildout potential for our county, based on the number of existing parcels and the land-use designations, is about five times our current year-round population (assuming two people per residence). In a normal summer, the number of people in our islands doubles. These estimates are based on analysis of San Juan County parcel data by Joe Symons and National Park data on the number of summer visitors.

Allowing the development potential to increase by allowing existing Forest Resource parcels to be redesignated as Rural Farm Forest is something that I oppose based on concerns that the “carrying capacity” of our islands would be further exceeded.

Also, the multitude of benefits that forested lands provide would be decreased as residential development replaced existing forests. The benefits of forests include removal of carbon dioxide from our atmosphere. This is in contrast to the significant increases in greenhouse gas production associated with residential development.

In addition, the cost of county services related to land that is residential in use is vastly greater than the cost of county services related to forested or agricultural lands.

The existing Forest Resource criteria and the proposed changes are copied below.

Analysis by Community Development and Planning staff has found:

“The current Forest Resource land designation criteria present the opposite problem from the Agricultural Resource land designation criteria. Many parcels in the County do not meet the Plan’s Forest Resource land designation criteria though they might be commercially significant. The designation criteria are too specific and might exclude from designation lands that are commercially significant for forestry.”

And:

“Only 213 or about 1.23 percent of parcels in the County meet all four of the designation criteria. It is likely that some commercially significant forest lands do not meet the Plan criteria. Natural resource land designations ought to preserve lands with long-term commercial significance from conversion to incompatible uses. If the designation criteria are too specific, they run the risk of excluding lands that have

more long-term commercial significance. This appears to be the case with the Forest Resource designation criteria.”

Thus, the Community Development and Planning analysis concludes we are at risk of losing valuable Forest Resources.

So, for climate, for timber production, for water resource protection, for wildlife, please expand the criteria for Forest Resource Land to include Carbon Sequestration as having “long-term commercial significance”.

And please prohibit existing Forest Resource-designated parcels from being redesignated to Rural Farm Forest or other designations that allow for denser residential development. When the original Comp Plan was adopted, the designation of parcels as Forest Resource would have been based in these lands being valuable as forest resources. There is no shortage of undeveloped parcels that will permit additional residential development.

Thank-you for your attention and for your service on the Planning Commission!

Janet Alderton  
Deer Harbor  
Orcas Island

See page three at this link:

<https://www.sanjuanco.com/DocumentCenter/View/21615/December-29-2020-Staff-Memo-Natural-Resource-Land-Policies-Discussion-on-January-15-2021?bidId=>

“The current Forest Resource land designation criteria present the opposite problem from the Agricultural Resource land designation criteria. Many parcels in the County do not meet the Plan’s Forest Resource land designation criteria though they might be commercially

significant. The designation criteria are too specific and might exclude from designation lands that are commercially significant for forestry. The Plan establishes four criteria for designation as forest resource in Policy 2.3.D.5.b.1. Under the Plan criteria, parcels must meet all four of the following criteria to be designated forest resource land:

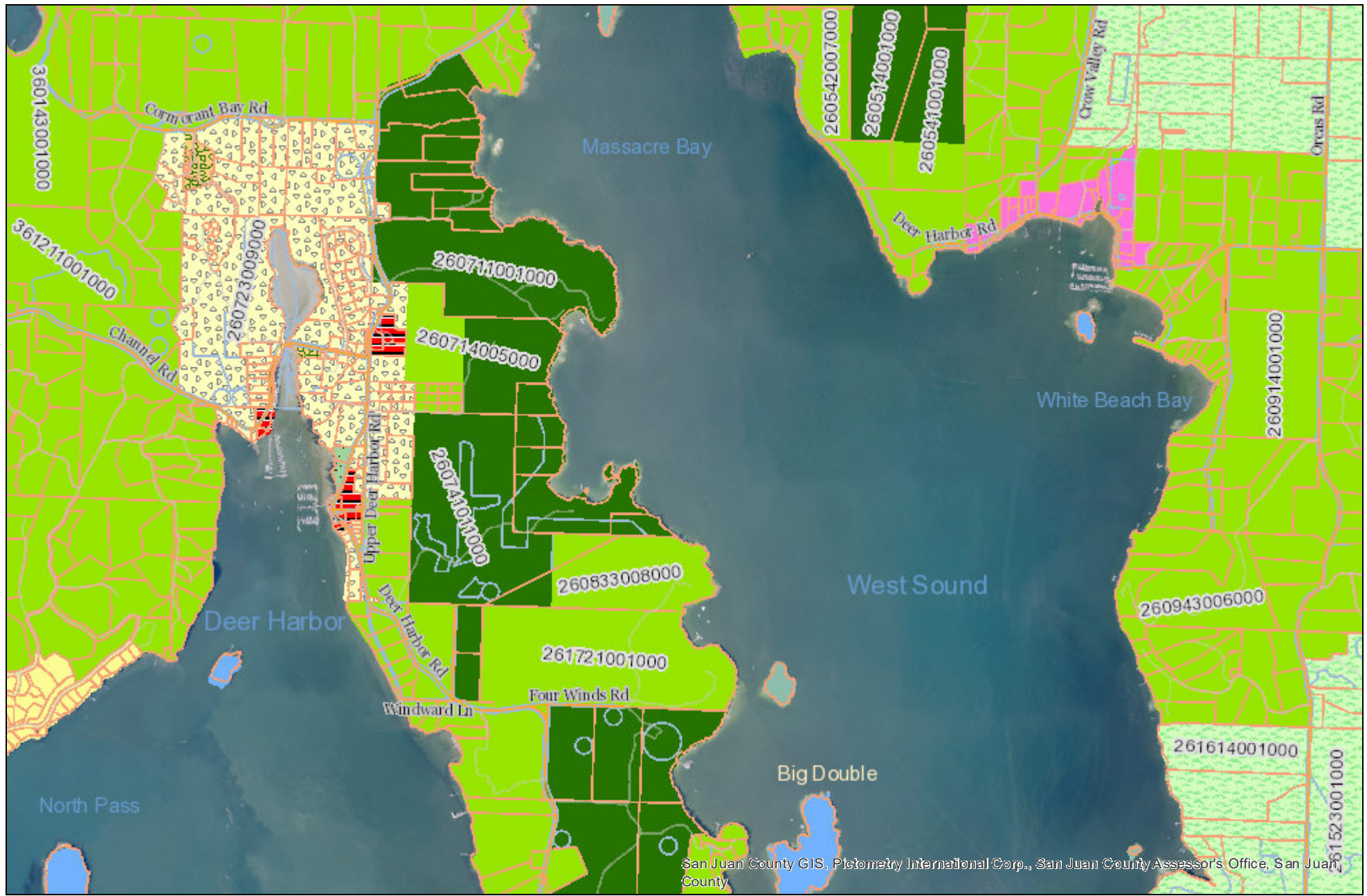
- ♣ Lands in grades 1-5 on the State's Private Forest Land Grades map;
- ♣ Parcels are twenty acres or larger;
- ♣ Parcels participate in the Designated Forest Land or Open Space Timber tax programs; and
- ♣ Lands are being managed for the long-term production of forest products  
or even one of the proposed requirements.

From pages 3 and 4 of

<https://www.sanjuanco.com/DocumentCenter/View/21615/December-29-2020-Staff-Memo-Natural-Resource-Land-Policies-Discussion-on-January-15-2021?bidId=>

“The attached draft includes new Forest Resource land designation criteria that are less specific to give more flexibility and ensure that more commercially significant lands also qualify for forest resource land designation. Under the proposed amendments to the Plan forest resource land designation criteria, parcels that are commercially significant based on the countywide analysis can be designated forest resource provided they meet one of the following:

- Lands participating in the designation forest land, current-use timber land, or open space-timber tax programs;
- State trust lands under forest management;
- Lands managed for the long-term production of forest products with few non-forest related uses; or
- Areas with at least 100 contiguous acres of forest land developed at a density less than one dwelling unit per fifteen acres.

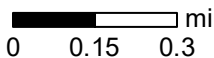


San Juan County GIS, Pictometry International Corp., San Juan County Assessor's Office, San Juan County



This map is derived from San Juan County's Geographic Information System (GIS). It is intended for reference only and is not guaranteed to survey accuracy. The information represented on this map is subject to change without notice.

1 in = 1,800 feet



# Deer Harbor Forest Resource