

## Adam Zack

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**From:** jmc779 at rockisland.com <jmc779@rockisland.com>  
**Sent:** Saturday, June 12, 2021 7:57 PM  
**To:** Comp Plan Update  
**Cc:** Adam Zack  
**Subject:** GROWTH in the LCA  
**Attachments:** TO COMP PLAN 6-9-21.docx

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Dear Adam,  
Rather than fix my earlier comments to pass security, I am sending a fresh and revised edition document to compplan comments. Please confirm that it made it to that destination.  
Thanks,

.....John Campbell

June 12, 2021

From: John M. Campbell

To: [compplancomments@sanjuanco.com](mailto:compplancomments@sanjuanco.com)

EXECUTIVE SUMMARY:

Land Capacity Analysis (LCA) is the principal means of determining compliance with the GMA Goals to:

To encourage growth in Urban Areas,

Reduce sprawl, the conversion of undeveloped land into low density development, and

Encourage the availability of affordable housing.

Herein the author demonstrates that San Juan County planners are failing to properly account for approximately 2/3 of their projected growth in the county in their Land Capacity Analysis (LCA) and failing to provide any analysis or data at all for the situation on San Juan Island. The heart of the issue is how to account for the “Recreational Growth,” vacation homes, rental homes, etc. that are in addition to the normal population growth and constitute roughly 2/3 of all growth in the county. County methodology transposes, or “Factors” 2,655 projected homes into 533 units. Further, the analysis ignores the requirement to plan for 50% of growth in the island UGA’s

As the County planners begin to conclude their study of updating the Comprehensive Plan, it is timely to draw our attention to the nexus

of Growth Management (GM) and affordable housing in San Juan County. GM has three primary goals:

1. To encourage development in urban areas,
2. To reduce sprawl, the conversion of undeveloped land into low density development, and
3. To encourage the availability of affordable housing to all segments of the population.

To be clear, goal #3 does not oblige local government to actually build housing but simply to insure that there is sufficient suitably zoned land to accommodate projected growth. In order to demonstrate compliance with these goals, counties are required to complete a Land Capacity Analysis (LCA) demonstrating that there is sufficient land (development capacity) for projected housing growth.

Judging by current drafts, the planners seem to find that sufficient development capacity presently exists, both on San Juan and Orcas islands. Unfortunately, that analysis fails to account for ALL of the projected growth. Typically housing growth is measured by projected population growth which is projected to be 1,525 new families. In SJ County, however, (see the LCA Doc 19498) housing growth consists of population growth plus the recreational housing growth, i.e. the summer homes, summer rentals etc., all the seasonally occupied housing growth in addition to population growth (see Doc 19498 pg. 25 Figure 5-9).

Just how much that seasonal growth is varies widely depending on the data source used. Currently CD&P is using building permit data from the State Employment Security Dept. which forecast 4,180 new

units countywide by 2036. That data source indicates that seasonal growth will be  $4,180 - 1,525 = 2,655$  units, or 1.74 times family growth, i.e.:

New families.....1,525  
Seasonal growth @ 174% .....2,655  
Total growth.....4,180 new units

However, the DRAFT Land use and Rural section 2.1.C Population and Housing Forecast states:

*“The GMA requires the County to insure that the PLAN and its implementing regulations provide enough capacity of land suitable for development to accommodate the projected housing.....The County’s average household size is 2.04 people per household. At this rate, the number of households will increase from 7,997 to 9,521 by 2036, an increase of 1,524 households .....Appendix 5, Housing Needs Assessment, indicates there were 13,859 housing units in the county in 2016. If housing units continue to grow at an average annual rate of 209 per year (the rate between 1980 and 2016) a total of 18,059 dwellings will be expected by 2036. This is an increase of 4,180 dwelling units over 2016 levels.”*  
*Table 2 shows .....there is sufficient housing capacity to accommodate the forecasted.....1524 new households.”*

But Table 2 shows capacity of 2,691 dwellings, far short of the 4,180 dwellings projected for which provision must be made.

The other data source, not used, is the US Census data which indicates a history of dwelling growth of 4.3 times family growth from 2000 to 2010.

Notwithstanding the data, the county planners are only planning for growth of merely the population of 1,525 units and “factoring” for seasonal growth.

How does that work out for Orcas Island and Eastsound?

New families on Orcas.....504  
Seasonal growth @ 174%.....877  
Total Orcas Island growth.....1,381 new units

In accordance with Land use Policy 2.3.A.12 and County Ordinance 13-2005, 50% of Orcas island growth should be planned for in the Eastsound UGA. That means the Eastsound UGA should provide capacity for  $1,381/2 = 690$  units. In fact, Table 2 shows an Eastsound UGA capacity 320 units, less than half of the required 690 units. No wonder there is so little vacant land available in the UGA. For all of Orcas Island there is (see Element B.2 Doc 26161 pg. 5-6) a total capacity of:

Orcas Rural inc. Activity Ctrs. & LAMRID.....1,412  
Eastsound UGA (scenario B).....320  
1,732 units,

This is 25% over the projected growth (before adjusting for market and public use factors).

What does it matter if Eastsound is too small for projected growth as long as Orcas Island has enough adequately zoned land? Go back to those GMA goals discussed at the beginning:

1. Encourage development in urban areas, The PLAN allocates 18% of new growth to urban (Eastsound UGA) areas, far less than 50% committed to.
2. Reduce sprawl, the conversion of undeveloped land into low density development, The PLAN allocates 82% of growth to rural areas, far more than the 50% committed to.
3. Encourage the availability of affordable housing. With the median vacant rural property cost at around \$740,000, there is little likelihood that any low or moderate income family can afford a rural site or home.

Years ago, an economist commented on the San Juan County economy stating “The economy of San Juan County depends on the exploitation of the rural charm of the islands. The challenge is, how to exploit the resource without consuming it”.

## Reference:

Element B.2: .....<https://www.sanjuanco.com/DocumentCenter/View/21616>

Land Capacity Analysis: <https://www.sanjuanco.com/DocumentCenter/View/19498>

Housing Needs Assessment

<https://www.sanjuanco.com/DocumentCenter/View/19498/2019-12-17>

## PART 2 The Land Capacity Analysis

The County has responded to the preceding analysis stating:

*“The County forecasts 4,180 additional housing units by the year 2036 in the Housing Needs Assessment (HNA).*

*The gross residential land capacity results do not include public use, market factor and seasonal home factor deductions used (to) account for vacant housing units. These deductions are taken out to get final residential capacity.”*

Indeed, the County calculates the final residential capacity not by adding all the growth (population and recreational) together and factoring for market factor and public use, but rather by “factoring” for recreational growth by subtracting 35% of the population growth from the capacity. Therein lies the mischief.

And how does 35% x 1,525 resident family growth = 533 units account for a projected 2,655 seasonal dwelling growth? 35% is the proportion of all units in the county that are classified as “seasonally occupied”, it is a function of inventory, not growth. If one did not know from the HNA that Seasonal growth is projected to be 2,655 units or an additional 174% of population growth seasonal units” that might be a reasonable assumption. But in fact, we know from the HNA that that proportion is between 174% and 420%, not 35%. We know (HNA Doc 19498 pg.51) that the projected growth is 1,525 new families plus 2,655 (at least) seasonal units totaling 4,180 expected dwelling units over the planning period.

Table 2 Element B.2 Doc 26161 shows a raw capacity of 2,691 dwellings, countywide. Subtracting the adjustments for Market Factor and Public Uses:  $2,691 (.75 \times .95) = 1,918$  net dwelling capacity.

For Orcas Island, the proportionate numbers, in accordance with Document 21616, are:

Family growth =..... 504

Seasonal housing growth @ 174% =  $504 \times 1.74 = \underline{877}$

Gross projected Orcas housing growth.....1,381 units.

This projected growth is met with an island wide capacity (Table 2 Doc 21616) of 1,732 units ( $1,381 + 320 = 1,701$ ). Factoring for public uses and Market Factor:  $1,701 (.95 \times .75) = 1,212$  net dwelling capacity on Orcas Island is clearly less than projected growth of 1,381.

The picture for Eastsound, however, is more serious. In accordance with Comprehensive Plan Section B Element 2 LAND USE Policy 2.3.A.12 and Ordinance 13-2005, the Eastsound UGA should be planned to provide land for 50% of projected Orcas Island growth. Similarly, Ordinance 16-2009 applies to Friday Harbor.

Fifty percent of projected growth on Orcas Island is:  $1,381/2 = 691$  units, yet Table 2 element B.2 Doc 26161, indicates Eastsound Scenario B has a capacity of only 320 units, less than half of 691. This is much more serious. The entire point of the LCA is to insure that the UGA can accommodate projected growth in order to encourage development in urban areas, reduce sprawl in rural areas and to encourage the availability of affordable housing. Eastsound is the only location on

Orcas Island that offers any opportunity for significant increase in high density, 4-12 unit/ acre, development. AT LEAST  $691 - 320 = 371$  additional units of capacity needs to be found around Eastsound for development, roughly 100 acres at 4 units/acre.

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