

## Sophia Cassam

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**From:** joe symons <joesymons@me.com>  
**Sent:** Thursday, September 9, 2021 10:50 AM  
**To:** Sophia Cassam; Cindy Wolf  
**Subject:** Comment re Docket 21-0003  
**Attachments:** density SJC 1977 editorial.pdf; docket 21-0003 support letters.txt; LCA\_DRAFT\_GDLI.xlsx; GDLICharts.xlsx; www.doebay.netappealSJC%20CP%20index%20rural%20lands.pdf

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I write to support Council in *reversing the Planning Commission determination that Docket Request 21-0003 not be advanced to be part of the work order before DCD and the county.*

### **Docket 21-0003 represents a minimum standard that should be implemented prior to the completion of the Comprehensive Plan (CP) update.**

GMA requires that a county's CP be internally consistent. As referenced in Docket 21-0003 (hereinafter 03), in 1999 SJC lost its argument before the Western Washington Growth Management Hearings Board (WWGMHB); the county argued that the CP was compliant under a "presumed valid" GMA general CP determination. However, the WWGMHB determined that, among other deficiencies, the 1979 densities are inconsistent with the county's vision statement. As you know, those densities were found to be in egregious violation of GMA, and thus they "substantially interfered" with the Act. Consequently, the WWGMHB imposed an invalidity order on the county which did not get lifted until ~2007 when the county settled with the Petitioners (I was one of the petitioners). Although some density changes were forced on SJC in order to lift the invalidity order, the issue of consistency was never put to additional testing before the HB or the courts. These density modifications reduced, in broad numbers, the original 1979 densities from a buildout population of approx 175,000 to approximately 134,000.

As seen in the SJC Gross Developmental Land Inventory (GDLI) data attached, the buildout population for SJC, assuming all parcels were developed to their maximum residential capacity (excluding commercial, industrial and public uses), and excluding the 10% ADU bump plus the visitor population, exceeds 134,000 people. It is essential that, should the Council accept the PC recommendation to not advance 03, the Council go on record as to how this population is consistent with our vision statement and our limited resources.

The Planning Commission received 82 letters (from March thru September 2021) in support of 03; a list of these comments appears in the attachments.

An editorial written in 1977 (attached below) argued that it was essential to "run the numbers" as to how many people might live in the islands should all parcels be developed. As you know, that calculation has never been done by SJC. Indeed, SJC has consistently refused to even run the numbers, much less conduct an impact study of what those numbers would mean in cost of services, taxes, non-monetary costs, community costs, environmental costs, etc. most likely because they do not want the public to know that they know what the maximum legal population might be. Why not produce these numbers? The most likely reason is due to anticipated enormous political disruption.

It has not been lost on the residents of SJC that studies related to the deleterious impact of such population growth, funded by or received by SJC during the early part of this century, are nowhere to be found on the

county's web site. These studies include the Cost of Community Services report and the Study of Socioeconomic Impacts of Growth Pressure in Selected Seasonal/Resort Communities; I don't know if such materials are buried somewhere in county archives and only retrievable via a Public Records Request (PRR), though without a formal legal discovery process, who would even know to ask the question? These studies appear to be available only on one website in the world: [doebay.net/appeal](http://doebay.net/appeal)

At a minimum, Council should require DCD to “run the numbers” (which takes nanoseconds) to calculate what the max legal density-assigned population is and make that number public. The SJC data to do this is supplied in the attachments. Note that this data had to be obtained by a PRR. The GDLI information is not published in the county's web site regarding GIS open data resource area.

*Cindy, in the CC deliberation phase, please ask your fellow council members to explain why a buildout and impact analysis should not be undertaken. It is, more than anything else, THE fundamental question that the county has consistently refused to undertake for the past 3 decades and essential to any meaningful CP. It is essential that the full council go on record as to why the docket should, or should not, be made part of the work order.*

With regard to the argument that “buildout” data has been done via the county's Land Capacity Analysis (LCA), I supply a commentary on an excerpt from the Friends of the San Juans (FOSJ) 03 support letter:

### **C. Request 21-0003—Resource capacity analysis**

We support the request to prepare a resource capacity analysis that takes the results of the County's 2018 Land Capacity Analysis and evaluates the impacts of that buildout on our community's quality of life.

Having read the LCA multiple times, I find it all but incomprehensible and certainly in the context of my docket request, irrelevant and misleading. The LCA is DCD's obscure and yet presumably best practices attempt to describe whether SJC has sufficient land to meet the county's obligation, not just under GMA but also under a WWGMBH order, that at least 50% of the projected OFM-initiated population projection for SJC for the next 20 years be available to house full time residents in the county's few UGAs. The LCA is specifically addressing the 20 year planning period, 2016-2036. There is nothing in there that deals with buildout, i.e., an “end-game” scenario in which every legal parcel was subdivided to its maximum number of parcels and each parcel thus formed, along with any parcels in the county which are currently undeveloped (defined as having a building value assigned by the assessor to be less than \$42,000 for that parcel), contains a residential structure (assuming it hasn't been already restricted to commercial, industrial or public land—parks, roads, etc.— purposes.) This buildout population estimate does not have a time period, such as 2036, attached to it.

The LCA is designed as a back stop to any possible GMA challenge that might reveal that SJC did not meet the 50% standard for activity center (UGA) population up to 2036. Since SJC has accepted a population estimate of about 3000 new people (roughly 1500 new SFRs), then the LCA has to demonstrate that sufficient UGA land to accommodate 750 of those SFRs is available. As to impact, there is nothing in the LCA that suggests there would be any limitation on meeting this population projection due to resource unavailability, such as water. Indeed, I don't recall anything in the LCA that describes any impact. The LCA merely shows that sufficient UGA acres are available with requisite densities to fulfill this requirement. However, “showing” that there is sufficient land capacity in the UGAs is a far cry from *requiring* that new development occur there to meet the GMA goal. Somewhere in the mountain of documents I have read from DCD is an admission that DCD is not expecting much of the new population to go to the UGAs. As I recall but cannot locate, they are expecting (i.e.,

“planning”) that something like 75% of new population growth will occur in the rural lands of the county, certifying that the CP is irrelevant and that the market rules.

As to rural lands density, GMA case law has honed in on a “bright line” between “rural” and “suburban or sprawl” of an average density in rural lands of a county that must be at least 1 dwelling unit (du) per 5 acres. Any rural lands densities in excess of that (i.e., more dense than 1du/5) is considered sprawl.

As an example of dry and incomprehensible, yet of vital significance, [one page](#) (attached below) of many many pages of dense numeric documentation [provided by SJC](#) during the litigation process, produced by the Planning Department in 2001, is a wall of tabular information. It has been annotated to reveal an otherwise obscure finding. You will note that it shows the density (in dwelling units/acre) of rural lands in SJC. Prior to petitioners successful challenge of the CP, the 1998 density of rural lands (think "trees and vistas") of SJC was 1 du/1.8 acres; you will see this as a red circle on the chart. At less than 1 DU/2 acres, the rural lands of the county at buildout, (70-90% of all acres in the county depending on definition of "rural lands") would look like a suburb. After the 1999 and 2000 WWGMHB rulings, the revised rural lands density at buildout is 1 du/4 acres (which is also "sprawl"), seen in the green circle. This quiet line in the middle of just one page (index number 260166) of a bushel of pages says, to anyone who knows what it means and where to find it, that at buildout SJC rural lands will be experienced as sprawl, as suburbia, as a whole landscape of tiny hobby farms over what, today, looks like unending undisturbed forest. You will not find this page in the CP nor will you find that this information has been made visible by news organizations, the Planning Department nor the County Council.

The point of advancing 03 to be a work component is to illuminate these hidden realities. DCD may be overloaded, but to argue against doing this fundamental work, an argument maintained by SJC for 30 years, is far below minimum acceptable standards for a CP, especially one that is in such conflict with the vast majority of residents.

You were elected to make tough and right/proper/appropriate decisions. If you cannot support 03, you must explain why.

With appreciation for the challenge before you,

Joe Symons  
Olga WA

Attachments:

Editorial from Island Record, 1977, re the need for a buildout population calculation.

List of Support letters sent to PC regarding 03

PRR GDLI data released in 2019 by DCD pursuant to a PRR

Summary of GDLI data (Symons)

Rural lands density at buildout in SJC / Official court document

<http://www.doebay.net/appeal/SJC%20CP%20index%20rural%20lands.pdf> : (double click the

pdf file to see the full page)

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

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# EDITORIALS

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## ★ Opinions Letters ★



### The Future Density

At the plan hearing in Friday Harbor both Dick Franck and Jack Powell, co-owners of the Wooden Shoe Farm, protested the forty-acre density restriction on their property. Dick Willard, owners of the Blazing Tree Ranch, also protested the plan restrictions, and implied he would sue. Many others in Friday Harbor and on Orcas and Lopez similiarly objected very strongly to the density restrictions.

Yet the proposed forty-acre density on the Wooden Shoe would result in something over a twelve-fold increase in density. The proposed ten-acre density on most of the Blazing Tree would result in a seventy-fold increase in density. The five-acre density asked for by Franck and Powell would be a hundred-fold increase in density.

A twelve-fold density increase on all land in the county would provide for 78,000 people, if the current population is used as a base. Summer population would be in addition to this.

A fifty, seventy, or hundred-fold increase in population is all but incomprehensible. That probably is not what Franck, Willard, and the others had in mind, except for their own property.

But the plan, restrictive as it is considered, does provide for a very substantial increase in population. Just how many it does provide for, in addition to the existing divided parcels, is not stated. No one has asked that question, but it should be asked.....and answered!

Any plan, and particularly this plan, should have some specified objectives. Population is one we can all understand.

The projected population under the comprehensive plan could be spelled out in fairly concrete — or rather “flesh and blood” — terms. Nearly everyone can relate to that in terms of people in ferry lines, people drawing water from the ground, and perhaps a twelve, fifty, or hundred fold increase in the size of the garbage dumps.

It would be the work of not more than a day or two with a scale to compute the area of each density zone and calculate the potential population, then add them up to get the potential population island by island, and for the county.

In the case of those areas designated “base” this could not be done since density in those areas is, for all practical purposes, unlimited. Perhaps “unlimited development district” would be a more appropriate term than “base.”

The figure could be further refined, at the expense of some additional time, to include the already developed parcels within each zone which are “grandfathered” in. The existing potential population then could be added to the “planned” potential population to give us the maximum the plan provides for.

This would doubtless be a startling figure indeed.

It would put the plan in perspective. In fact, it is difficult to see how any further evaluation of the plan can take place at all without this figure. It is the only way we can evaluate the limitations owners are being asked to accept against the problems of the future population.

From: <https://www.sanjuanco.com/1658/Annual-Docket>  
8 September 2021

82 letters in support of Docket Request 21-0003

2021-03-16\_2021 Docket\_PUB\_Wollman\_Build Out Analysis PDF  
2021-03-16\_2021 Docket\_PUB\_Turnoy\_Build Out Analysis PDF  
2021-03-16\_2021 Docket\_PUB\_Shubert\_Build Out Analysis PDF  
2021-03-17\_2021 Docket\_PUB\_Leyman\_Build Out Analysis PDF  
2021-03-17\_2021 Docket\_PUB\_Jenkins\_Build Out Analysis PDF  
2021-03-21\_2021 Docket\_PUB\_Acheson\_Build Out Analysis PDF  
2021-03-22\_2021 Docket\_PUB\_Greub\_Build Out Analysis PDF  
2021-03-23\_2021 Docket\_PUB\_Finley\_Build Out Analysis PDF  
2021-03-23\_2021 Docket\_PUB\_Turnoy\_Build Out Analysis PDF  
2021-03-27\_2021 Docket\_PUB\_Langhans\_Build Out Analysis PDF  
2021-03-29\_2021 Docket\_PUB\_Wong\_Build Out Analysis PDF  
2021-04-02\_2021 Docket\_PUB\_Menacho\_Build Out Analysis PDF  
2021-05-15\_2021 Docket\_PUB\_Symons\_Support Request 21-0003 PDF  
2021-05-16\_2021 Docket\_PUB\_Roumel\_Support Request 21-0003 PDF  
2021-05-16\_2021 Docket\_PUB\_Turnoy\_Support Request 21-0003 PDF  
2021-05-16\_2021 Docket\_PUB\_Donatuto\_Support Request 21-0003 PDF  
2021-05-16\_2021 Docket\_PUB\_Aldort\_Support Request 21-0003 PDF  
2021-05-17\_2021 Docket\_PUB\_Oaksen\_Support Request 21-0003 PDF  
2021-05-17\_2021 Docket\_PUB\_Shubert\_Support Request 21-0003 PDF  
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2021-05-17\_2021 Docket\_PUB\_Bettis\_2\_Support Request 21-0003 PDF  
2021-05-17\_2021 Docket\_PUB\_Beeman\_Support Request 21-0003 PDF  
2021-05-17\_2021 Docket\_PUB\_Clancy\_Support Request 21-0003 PDF  
2021-05-18\_2021 Docket\_PUB\_Cooter\_Support Request 21-0003 PDF  
2021-05-18\_2021 Docket\_PUB\_Snowden\_Support Request 21-0003 PDF  
2021-05-18\_2021 Docket\_PUB\_Brazeau\_TruthInPlanning\_Kane PDF  
2021-05-18\_2021 Docket\_PUB\_Brazeau\_TruthInPlanning\_Gaquin PDF  
2021-05-18\_2021 Docket\_PUB\_Brazeau\_TruthInPlanning\_Ellingson PDF  
2021-05-18\_2021 Docket\_PUB\_Brazeau\_TruthInPlanning\_Uhler PDF  
2021-05-18\_2021 Docket\_PUB\_Brazeau\_TruthInPlanning\_Smith PDF  
2021-05-18\_2021 Docket\_PUB\_Brazeau\_TruthInPlanning\_Rubey PDF  
2021-05-18\_2021 Docket\_PUB\_Brazeau\_TruthInPlanning\_Roundy PDF  
2021-05-18\_2021 Docket\_PUB\_Brazeau\_TruthInPlanning\_Pickett PDF  
2021-05-18\_2021 Docket\_PUB\_Brazeau\_TruthInPlanning\_Knoellinger PDF  
2021-05-18\_2021 Docket\_PUB\_Quenell\_Support Request 21-0003 PDF  
2021-05-18\_2021 Docket\_PUB\_Mustard\_Support Request 21-0003 PDF  
2021-05-19\_2021 Docket\_PUB\_Boyce\_Support Request 21-0003 PDF  
2021-05-19\_2021 Docket\_PUB\_Pedigo\_Support Request 21-0003 PDF  
2021-05-19\_2021 Docket\_PUB\_Palmer\_Support Request 21-0003 PDF  
2021-05-19\_2021 Docket\_PUB\_Lund\_Support Request 21-0003 PDF  
2021-05-19\_2021 Docket\_PUB\_Monaco\_Support Request 21-0003 PDF  
2021-05-19\_2021 Docket\_PUB\_Suij\_Support Request 21-0003 PDF  
2021-05-19\_2021 Docket\_PUB\_Johnson\_Support Request 21-0003 PDF  
2021-05-19\_2021 Docket\_PUB\_Griswold\_Support Request 21-0003 PDF  
2021-05-20\_2021 Docket\_PUB\_Yturri\_Support Request 21-0003 PDF

2021-05-22\_2021 Docket\_PUB\_Rhodes\_Support Request 21-0003 PDF  
2021-05-22\_2021 Docket\_PUB\_Jenkins\_Support Request 21-0003 PDF  
2021-05-23\_2021 Docket\_PUB\_LorenJohnson\_Support Request 21-0003 PDF  
2021-05-23\_2021 Docket\_PUB\_Beyer\_Support Request 21-0003 PDF  
2021-05-24\_2021 Docket\_PUB\_MichaelJohnson\_Support Request 21-0003 PDF  
2021-05-27\_2021 Docket\_PUB\_Symons\_Request 21-0003 PDF  
2021-05-28\_2021 Docket\_PUB\_Conley\_Request 21-0003 PDF  
2021-06-10\_2021 Docket\_PUB\_Wong\_Support Request 21-0003 PDF  
2021-06-10\_2021 Docket\_PUB\_Suij\_Support Request 21-0003 PDF  
2021-06-10\_2021 Docket\_PUB\_Aldort\_Support Request 21-0003 PDF  
2021-06-13\_2021 Docket\_PUB\_Mann\_Support Request 21-0003 PDF  
2021-06-11\_2021 Docket\_PUB\_Taylor\_Support Request 21-0003 PDF  
2021-06-11\_2021 Docket\_PUB\_Monaco\_Support Request 21-0003 PDF  
2021-06-11\_2021 Docket\_PUB\_Malcom\_Support Request 21-0003 PDF  
2021-06-11\_2021 Docket\_PUB\_Jenkins\_Support Request 21-0003 PDF  
2021-06-14\_2021 Docket\_PUB\_Friends of the San Juans PDF  
2021-06-14\_2021 Docket\_PUB\_Turnoy\_Support Request 21-0003 PDF  
2021-06-14\_2021 Docket\_PUB\_Grout\_Support Request 21-0003 PDF  
2021-06-15\_2021 Docket\_PUB\_Budner\_Support Request 21-0003 PDF  
2021-06-15\_2021 Docket\_PUB\_Acheson\_Support Request 21-0003 PDF  
2021-06-15\_2021 Docket\_PUB\_Rose\_Support Request 21-0003 PDF  
2021-06-15\_2021 Docket\_PUB\_Ringzin\_Support Request 21-0003 PDF  
2021-06-15\_2021 Docket\_PUB\_Oaksen\_Support Request 21-0003 PDF  
2021-06-15\_2021 Docket\_PUB\_Kramer\_Support Request 21-0003 PDF  
2021-06-15\_2021 Docket\_PUB\_Densmore\_Support Request 21-0003 PDF  
2021-06-16\_2021 Docket\_PUB\_Carlson\_Support Request 21-0003 PDF  
2021-06-16\_2021 Docket\_PUB\_Stillman\_Support Request 21-0003 PDF  
2021-06-16\_2021 Docket\_PUB\_Bahrych\_Requests 21-0003 and 21-0007 PDF  
2021-06-17\_2021 Docket\_PUB\_Dash\_Support Request 21-0003 PDF  
2021-06-17\_2021 Docket\_PUB\_Sanburn\_Docket Comments PDF  
2021-06-17\_2021 Docket\_PUB\_Hays\_Norquist\_Support Request 21-0003 PDF  
2021-06-18\_2021 Docket\_PUB\_Bailey\_Docket Comments PDF  
2021-06-18\_2021 Docket\_PUB\_Symons\_Support Request 21-0003 PDF  
2021-06-18\_2021 Docket\_PUB\_Pascuito\_Support Request 21-0003 PDF  
2021-07-07\_2021 Docket\_PUB\_Friends of the San Juans\_Support Request 21-0003 PDF  
2021-07-15\_2021 Docket\_PUB\_Symons\_Support Request 21-0003 PDF  
2021-09-07\_2021 Docket\_PUB\_Transition Lopez\_Comments for Council PDF  
2021-09-08\_2021 Docket\_PUB\_Alderton\_Request 21-0003

## Category Codes and Descriptions for LCA / GDLI

**Table 1. Land Capacity Analysis Gross Developable Land Inventory Types.**

**Type Description**

- R Residential.
- CI Commercial and Industrial.
- MU Mixed Use. The land use designation allows for a mix of commercial and residential uses.
- P Public, Utility, and Conservation. Parcels with this type have existing uses that preclude additional development (i.e. public parks, platted open space, parcels with electrical sub-stations, etc.).
- ' ' N/A. These parcels are located in the County but the County does not have jurisdiction over them (i.e. Town of Friday Harbor).

**Table 2. Land Capacity Analysis Gross Developable Land Inventory Categories.**

**Category Description**

- 0 Fully-developed. Property that is assumed to have no further development capacity.
- 1 Partially Used. Residential property occupied by a use allowed by its land use designation which contains enough land to be further subdivided or developed.
- 2 Vacant. Property with minimal or no building improvements.
- 3 Vacant and Subdividable. Vacant property that can also be further divided into smaller lots.
- 4 Re-developable. A parcel that has a land use designation that allows uses that would be more intensive than an existing use (i.e. a parcel with a single-family home in a commercial land use designation).
- 5 N/A. Parcels in this category are located in the County but the County does not have jurisdiction over (i.e. Town of Friday Harbor)

From the LCA mapping tool information button at  
<http://sjcgis.maps.arcgis.com/apps/webappviewer/index.html?id=2bd8ee18da174c1db126cacbf8198729>

**Source:**

public records request, "[LCA\\_DRAFT\\_GDLI.xlsx](#)"

**Attachments:**

[LCA\\_DRAFT\\_GDLI.xlsx](#)

--- Please respond above this line ---

**San Juan County**  
**Office of the County Manager**  
**Public Records**

Mail: 350 Court Street No. 5, Friday Harbor, WA 98250 - (360) 370-7410  
Location: 55 Second Street, 2nd floor, Friday Harbor, WA 98250 - Fax (360) 370-5085

Joe,

Re: Public Records Request concerning PRR P002912-060719

Specifically you requested:  
*"spreadsheet used to create the new GDLI map as posted on the SJC web site. See email correspondence:*

Hi Joe,

Yes, we can provide the spreadsheet.

Please make a public records request.

<https://www.sanjuanco.com/349/Public-Records-Request>

All of the data in the spreadsheet is provided in the GDLI map pop-up.

Linda Kuller, AICP  
Planning Manager  
360-370-7572"

If you have any questions you may contact me at 360 370-7410.

Sincerely,  
Sally Rogers  
Public Records Clerk

To monitor the progress, update or retrieve responsive files on this request please log into the [Public Records Center](#).

**Data and Charts from SJC's GDLI database**

Gross Developable Land Inventory (GDLI), San Juan County, WA. Summer 2019

SJC references: [https://www.sanjuanco.com/DocumentCenter/View/18630/2019-06-14\\_LCA\\_DCD\\_GDLI\\_pres\\_AZ\\_PC-CC\\_June\\_2019?bidId=](https://www.sanjuanco.com/DocumentCenter/View/18630/2019-06-14_LCA_DCD_GDLI_pres_AZ_PC-CC_June_2019?bidId=)

also: [https://www.sanjuanco.com/DocumentCenter/View/18555/2019-06-04\\_DCD\\_GDLI\\_LCA\\_Method\\_w-ATT\\_Zack\\_PCCC\\_June\\_2019?bidId=](https://www.sanjuanco.com/DocumentCenter/View/18555/2019-06-04_DCD_GDLI_LCA_Method_w-ATT_Zack_PCCC_June_2019?bidId=)

The data and charts shown here were extracted and created by Joe Symons using SJC's GDLI information (see below) in summer, 2019

**Summary**

The data represents a first approximation of the buildout potential in San Juan County based on the existing density map and current regulations  
 The number of parcels and the number of acres shown in the first 2 charts is relatively fixed; acres cannot increase, and parcel increases can only occur through subdivision

Only about 3% of the parcels can be increased by subdivision

About 12% of the total county acreage is available for further parcelization/subdivision

Not counting category 5 (Friday harbor) (i.e., all other areas of the county) , the GDLI buildout population is about 43,000

Of Friday Harbor's 1938 parcels, constituting about 700 acres out of SJC's ~113,000 acres, 1174 have an assigned density of 0.01 acres/du

That is, these parcels may be developed to a maximum of 100 units per acre

The balance of FH parcels have densities from 1du/5 acres (a handful) to parcels dominated by densities 0.25, 0.125, and 0.05 acres/du.

Consequently, the buildout population potential in Friday Harbor alone is calculated as over 90,000.

**Data Sources:**

LCA\_DRAFT\_GDLI.xlsx data obtained from SJC via public records request 6/13/2019.

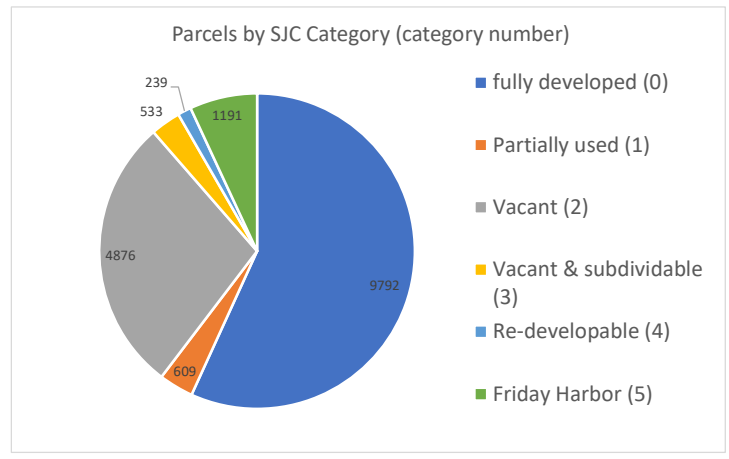
(data source SJC: LCA\_DRAFT\_GDLI.xlsx located in comp plan/maps 2018 dean)

data source made into filemaker file: LCA\_DRAFT\_GDLI.fmp12 located in comp plan/maps 2018 dean

categories description at bottom of spreadsheet

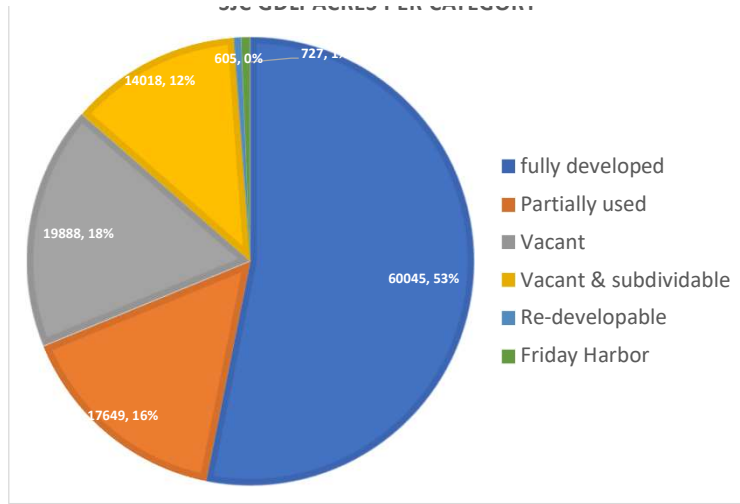
**Parcels**

category	count	%
fully developed (0)	9792	56.8%
Partially used (1)	609	3.5%
Vacant (2)	4876	28.3%
Vacant & subdividable (3)	533	3.1%
Re-developable (4)	239	1.4%
Friday Harbor (5)	1191	6.9%
<b>total</b>	<b>17240</b>	<b>100.00%</b>

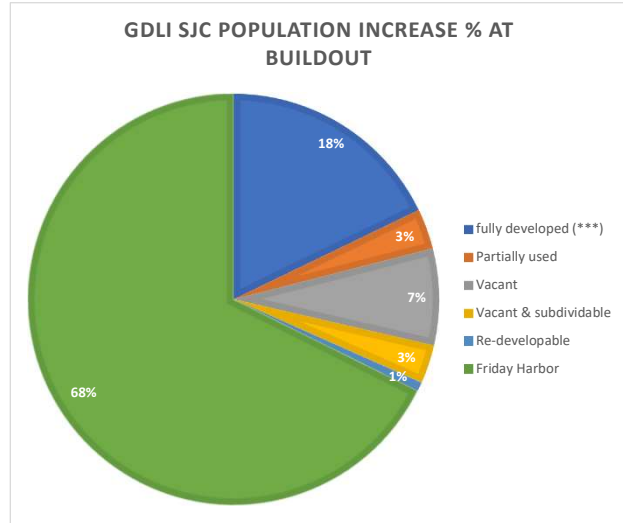


**SJC GDLI ACRES PER CATEGORY**

acres	acres	percent
fully developed	60045	53.2%
Partially used	17649	15.6%
Vacant	19888	17.6%
Vacant & subdividable	14018	12.4%
Re-developable	605	0.5%
Friday Harbor	727	0.6%
total	112932	100.00%



build out(*)	structures	new	total	% increase	t1l population (**)	
fully developed (***)		9792	1941	11733	120%	23935
Partially used		609	1475	2084	342%	4251
Vacant		0	4988	4988	0%	10176
Vacant & subdividable		529	1464	1993	377%	4066
Re-developable		237	217	454	192%	926
Friday Harbor		1191	43298	44489	3735%	90758
total						43354
						134112



(\*) data based on dd sjc parcels database linked to gdli database for category  
 Note: there is minor discrepancy as the dd sjc parcels database has 17201 parcels and the gdli database has 17240  
 Note: this data includes all commercial and industrial lands; actual build out would be less, tho many commercial/industrial land uses permit SFR's  
 Note: many parcels are EX and may not have development potential.

(\*\*) at 2.04 persons/structure

(\*\*\*) # in new column may need to be discounted or eliminated due to EX parcels and data irregularities. Hand work

total population	SJC GDLI buildout population by category
fully developed (***)	23935

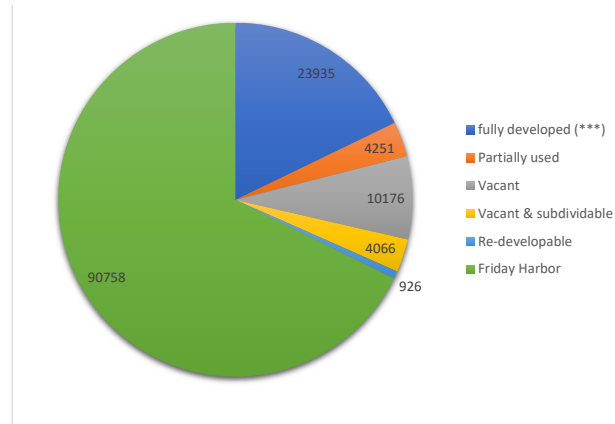
Partially used	4251
Vacant	10176
Vacant & subdividable	4066
Re-developable	926
Friday Harbor	90758

source: GDLI LCA Legend.docx in same location as above

**Table 2. Land Capacity Analysis**

Gross Developable Land Inventory Categories.

Category	Description
0	<b>Fully-developed.</b> Property that is assumed to have no further development capacity.
1	<b>Partially Used.</b> Residential property occupied by a use allowed by its land use designation which contains enough land to be further subdivided or developed.
2	<b>Vacant.</b> Property with minimal or no building improvements.
3	<b>Vacant and Subdividable.</b> Vacant property that can also be further divided into smaller lots.
4	<b>Re-developable.</b> A parcel that has a land use designation that allows uses that would be more intensive than an existing use (i.e. a parcel with a single-family home in a commercial land use designation).
5	<b>N/A.</b> Parcels in this category are located in the County but the County does not have jurisdiction over (i.e. Town of Friday Harbor)



Changes in Designation, 1998 to 2000 San Juan County Comprehensive Plan, Separating State and Federal Lands

Land Use Designation <sup>1,2</sup>	1998 Designation			2000 Designation <sup>2</sup>			Average Parcel Size (acres)			
	Existing Parcels	Area (ac)	Potential Units <sup>3,4</sup>	Existing Parcels	Area (ac)	Potential Units <sup>3</sup>	1998 Existing	1998 Buildout	2000 Existing	2000 Buildout
<b>Resource Lands (excluding state and federal lands)</b>										
Agriculture	583	13,786.3	1,447	578	13,698.7	1,070	23.6	9.5	23.7	12.8
Forest	645	18,436.5	2,696	553	17,373.3	969	28.6	6.8	31.4	17.9
<b>Total Resource Lands</b>	<b>1,228</b>	<b>32,222.8</b>	<b>4,143</b>	<b>1,131</b>	<b>31,072.0</b>	<b>2,039</b>	<b>26.2</b>	<b>7.8</b>	<b>27.5</b>	<b>15.2</b>
<b>Rural Lands (excluding state and federal lands)</b>										
Rural Residential	4,802	9,292.7	7,458	4,453	8,605.6	4,782	1.9	1.2	1.9	1.8
Rural Farm Forest	6,575	47,347.0	11,725	6,677	48,848.0	9,575	7.2	4.0	7.3	5.1
Rural Commercial	1	10.0	1	1	10.0	1	10.0	10.0	10.0	10.0
Rural General Use	275	1,928.5	513	275	1,928.5	458	7.0	3.8	7.0	4.2
Rural Industrial	11	133.8	22	11	133.8	14	12.2	6.1	12.2	9.6
Island Center	22	87.9	22	22	87.9	22	4.0	4.0	4.0	4.0
Conservancy	105	2,297.0	335	105	2,297.1	280	21.9	6.9	21.9	8.2
Natural	52	1,704.4	186	53	1,705.1	53	32.8	9.2	32.2	32.2
<b>Total Rural Lands Not in Activity Centers<sup>5</sup></b>	<b>11,843</b>	<b>62,801.2</b>	<b>20,262</b>	<b>11,597</b>	<b>63,615.9</b>	<b>15,185</b>	<b>5.3</b>	<b>3.1</b>	<b>5.5</b>	<b>4.2</b>
Village, Hamlet and Residential Activity Centers <sup>3,4</sup>	1,585	2,820.9	15,244	856	1,229.6	1,057	1.8	0.2	1.4	1.2
Eastsound Rural				135	485.6	171			3.6	2.8
<b>Total Rural Lands<sup>5</sup></b>	<b>13,428</b>	<b>65,622.2</b>	<b>35,506</b>	<b>12,588</b>	<b>65,331.0</b>	<b>16,413</b>	<b>4.9</b>	<b>1.8</b>	<b>5.2</b>	<b>4.0</b>
Master Planned Resorts Eastsound, Lopez Village, Friday Harbor UGAs	30	435.9	859	30	435.9	489				
	17	5.1	*	954	1,447.1	*				
<b>Total Unincorporated State and Federal Lands in Unincorporated Areas<sup>6</sup></b>	<b>14,703</b>	<b>98,286.0</b>	<b>*</b>	<b>14,703</b>	<b>98,286.0</b>	<b>*</b>				
	159	13,042.9	2,426	159	13,042.9	283	82.0	5.4	82.0	46.1
<b>Total Unincorporated With State and Federal Lands</b>	<b>14,862</b>	<b>111,328.8</b>	<b>*</b>	<b>14,862</b>	<b>111,328.8</b>	<b>*</b>				
Town of Friday Harbor	932	785.7	*	932	785.7	*				
<b>Total County</b>	<b>15,794</b>	<b>112,114.5</b>	<b>*</b>	<b>15,794</b>	<b>112,114.5</b>	<b>*</b>				

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\* The projected number of dwelling units for growth areas is based on projected growth rates and not on legal maximum density for each parcel.

See *Analysis of Proposed Urban Growth Areas, Activity Centers, and Residential Activity Centers* for discussion of development of urban growth areas.

1. Uses and densities assigned based on parcel centroid. Parcels which cross use or density boundaries are considered as if in a single category.
2. As adopted by BOCC 10/2/00. (Includes resource land redesignations which were invalidated by Growth Management Hearings Board November 30, 2000.)
3. Potential number of dwelling units assumes all parcels divided and developed to their full designated density, but without density bonuses.
4. Dwelling unit estimates for activity centers assume all areas are developed for residential use, including areas now used for schools, churches, retail use, etc.
5. 1998 Potential Units does not include up to approximately 12,000 potential additional units in shoreline areas as estimated by the San Juan County Permit Center.
6. State and Federal Lands: Assessor's parcel file shows tax status "ST" or "FE". Units and average parcel sizes shown for rural and resource lands only.