SAN JUAN COUNTY
DEPARTMENT OF COMMUNITY DEVELOPMENT
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MEMO

REPORT DATE:	September 13, 2021
TO:	San Juan County Council
FROM:	Sophia Cassam, Planner I SC
SUBJECT:	2021 Annual Docket Public Hearing Public Comments
HEARING:	September 14, 2021
ATTACHMENTS:	Public Comments on the 2021 Docket

PURPOSE: Transmittal of written public comments on the 2021 Docket for the September 14, 2021 County Council public hearing. The comments attached were received between September 7 and 13, 2021.

Via Email: sophiac@sanjuanco.com

San Juan County Council
350 Court Street, No. 1
Friday Harbor, WA 98250

Dear County Council Members:

Thank you for the opportunity to comment on the County's 2021 Annual Docket ("Docket"). The following four issues are of great concern to Transition Lopez Island as they contribute directly to the present and future resilience of our community: commercial composting on agricultural lands, resource capacity analysis, tree conservation, and stormwater code updates.

1. **Request 21-0001—Commercial composting on farmlands**

This request seeks to revise the County Code to authorize the installation of commercial composting facilities on designated Agricultural Resource Lands through a provisional use or conditional use permit. County staff recommend opening up farmlands to commercial composting after completion of the Comprehensive Plan update. **We disagree with this recommendation** and strongly support reserving the use of these highly protected and valuable Agricultural Resource Lands solely for agriculture, continuing to allow non-commercial composting consistent with the agricultural activities on those lands.

We wholeheartedly endorse increased opportunities for both commercial and noncommercial composting in the San Juans. In addition to serving people who don't have the ability to compost at home, commercial-scale composting could help our community transition away from single-use plastics and toward materials that can break down and provide a valuable natural soil amendment/fertilizer. However, opening up designated Agricultural Resource Lands to commercial composting is incompatible with the intended use of such land. Instead farmland not set aside as designated resource land should be used for commercial composting. We also encourage the County to investigate local commercial composting infrastructure that could be constructed and operated on the thousands of acres already zoned for it. We understand that the Port of Friday Harbor and the Exchange on Orcas have expressed interest in such facilities.

2. **Request 21-0003—Resource capacity analysis**

Despite an enormous amount of public support for this, the County staff convinced the Planning Commissioners that doing a thorough build-out analysis isn't feasible or valuable. The Planning Commission tried to find a middle ground and ask for a more limited analysis, but now the

County staff is pushing back against that too. We agree that a full build-out analysis is a big project, but given the realities of rapid development in our County and the climate crisis, the critical information that our County would get from this analysis is just simply too important to defer this action any longer.

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. Such analysis would include a review of water availability to serve both the legal amount of water that can be withdrawn and the amount of water likely to be used based on current use patterns and trends indicating increased use. It would also identify transportation needs within and to the San Juans, projected energy needs, the soils' capacity to handle septic waste, emergency evacuation needs, health care needs, waste management, food supply, and housing needs for local employees and whether the high level of temporary housing use (we understand it to be approximately 40%) could accommodate the housing needs at full buildout.

3. **Request 21-0005—Tree conservation code provisions**

We're glad to see the County staff and Planning Commission members taking this seriously, and **support their recommendation to move forward with this**. To avoid confusion, we agree with staff that the tree protection standards installed in the Shoreline Master Program and Critical Areas Ordinance should not be consolidated into a single section. We also recommend that the County enact tree standards similar to those provided by the proponent. Unlike many jurisdictions, our Code does not currently provide general tree protection language. Because trees provide many benefits beyond beautiful landscapes and rural character – from essential habitat to carbon sequestration and more – we strongly support the adoption of general tree standards.

4. **Request 21-0008—Stormwater code updates**

This proposal would amend the Comprehensive Plan and update the County Code with language consistent with current stormwater standards to improve environmental protection, address stormwater runoff, control erosion and sedimentation, and especially promote aquifer recharge, both after stormwater and other precipitation events. Staff have already identified the need to update the stormwater code and propose adding the Comprehensive Plan language during the current update and to take up the stormwater regulation update in 2022-23. **We heartily support the staff recommendation** and look forward to this legislative update.

Thank you for your attention to these critical matters!
Transition Lopez Island Steering Committee
Ande Finley, Henning Sehmsdorf, Scott Finley, Ron Metcalf, Clarissa Szabados-Mish, Mike Moore, Bob Gerfy, Liz Lafferty, Chom Greacen, Kim Foley, and Ryan Palmateer

Sophia Cassam

From:	Jan Alderton <janetmalderton@gmail.com>
Sent:	Wednesday, September 8, 2021 8:58 AM
To:	Sophia Cassam; Cindy Wolf
Subject:	Docket Request 21-0003 (Build-out Analysis) Comments
Attachments:	Buildout Docket JA.docx

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Sophia,
Please share my following comments on Docket Request 21-0003 with the county councilors.
Janet Alderton
Orcas Island

Cindy,
Thank-you for all you do for our community and this special place!
Janet Alderton
Orcas Island

2021 Docket Request 21-0003 (Build-out Analysis)

I understand that trying to fulfill this docket request would consume vast amounts of staff time and attention, if the goal is to get as close to a perfect analysis as possible.

It has been said that the perfect is the enemy of the good.

I do not think an exact analysis is required.
The U.S. Census is never exact.
But its ballpark results are still useful.

I think the highest purpose of Joe Symons' request is to prod the bear slumbering in its den.
The bear has been slumbering comfortably for many decades.
It is time for the bear to wake up, lumber outside, and survey its domain.

Has anything changed?

Is San Juan County still a sleepy rural county that is “different” from all other counties?
Can people pretty much do as they wish, and it will not really matter?

Having nudged the sleepy bear persistently enough, it clambers out of its den and looks around.

It notices that we are being affected by Market Forces that have created a severe lack of housing for both low and moderate income residents.

The wise bear asks itself, “Will doing more of what got us here in the first place provide the housing our communities need to support the services and amenities that we all demand? My tummy is growling, but all the restaurants are packed with people waiting to be served by overworked staff who have no decent place to sleep.”

The bear wonders, “Are we running up against resource limits? I am very, very thirsty.”

If our population doubles or triples -or worse, will we have enough water resources?
Does it make sense to continue granting docket requests that change a land use designation from Forest Resource to Rural Farm Forest when the number of residences permitted will increase from one to eight each time this is granted?
Why increase the number of potential residences when no shortage of developable parcels exists (our ballpark buildout capacity is more than three times our current population.)

The bear wonders, “Might we be running up against transportation limits?
In the old days, I really enjoyed the occasional ferry ride.”

The Growth Management Act requires that transportation infrastructure be adequate to meet the projected growth.
The ferries are failing now.
And our funding system for ferry staffing, operations, maintenance, and replacement is not up to the task.
Just beginning to turn these deficiencies around will take at least 10 years.
In the meantime, things will likely get much worse.
This might be enough to make the bear shake its head and decide to clamber back inside its den.

In this context, where the "baked in" ballpark buildout exceeds three times our current population, why grant Docket Requests that change a land use designation from Forest Resource to Rural Farm Forest? The residence number goes from one to potentially eight.
We are not lacking buildable parcels in San Juan County.
I know that I mentioned this earlier, but it "bears" special consideration because of the ferry limitations.

There is no question that we are lacking resources such as ferry capacity and affordable housing.

We could well be losing ground on water resources as our climate warms and our rainfall patterns change. Adequate water is required by the GMA for current and projected growth. Growth will only increase water demands.
Stating that we can meet our future needs with desalination is not a responsible approach. Desalination is energy-intensive and creates concentrated salt waste.

We should have learned in our ever more polluted world that "dilution is NOT the solution".

Trucking water to supply new residences is also a truly misguided idea. Our islands are water limited, and trucking water over large distances uses energy and burns fossil fuels. I know of no electric water trucks.

A well-educated bear emerging from hibernation might ask her/himself, “Are we affected by the laws of physics? Does water run downhill -especially on impervious surfaces?”

An earlier County Council was not amused when I brought a cookie sheet, a container of water, and a towel to demonstrate that water does run downhill over impervious surfaces in San Juan County. The topic was the infiltration rate of stormwater flowing over barren rocky shorelines compared to shorelines with abundant native trees and shrubs.

I am very happy that more attention is being given to stormwater handling, but I think that we should also be requiring that less impervious surfaces be created in the first place.

More development creates more impervious surfaces = greater amounts of stormwater runoff = faster and greater potential damage during intense storms.

“Mitigation” is a minimalist approach that does not truly compensate for the destruction of wetlands, shoreline trees and native shrubs, upland forests, shrublands, and grasslands -all of which currently capture rainfall and permit it to infiltrate the soil. “Mitigations” are especially ineffectual in San Juan County because, for example, mitigation plantings are theoretically monitored for a few years (3 years?). For our overworked county staff, this might slide to the bottom of the “must do” list.

As storm events become more intense, development and its impervious surfaces have become ever greater generators of stormwater. The necessity of increasing the overall stormwater infiltration capacity has become obvious.

Maybe less obvious is the need to reduce the rate of creation of impervious surfaces. This is something that can be done in San Juan County. Pervious paving can be used, living roofs can be incentivized, rainwater catchment and reuse can be incentivized, rain gardens can be required, etc. Building footprints could also be reduced. Houses have grown ever larger as families have grown ever smaller.

In addition to preventing flooding, these measures allow water to infiltrate into the ground and recharge our essential aquifers.

In the conversation below, Alice C. Hill observes:

“But, unfortunately, we have built all of our structures, made our land use choices on the assumption that the past will resemble the future. “

Let us not remain hibernating and continue forward as if nothing has changed or will change. Nudge that bear until it truly awakens, emerges from its den, and surveys its domain with wise eyes that look towards the future of our children and our grandchildren and all life on planet earth.

Janet Alderton
Orcas Island

Extreme Weather Takes Many By Surprise

https://www.youtube.com/watch?v=LV_q1C6HmBY

Alice C. Hill was on the National Security Council under President Obama where she led the development of national policy to counter the catastrophic risks of climate change.

Her new book:
The Fight For Climate After Covid-19

"The threat is very serious.
Many call it dire.

We will see more extreme events for the foreseeable future, and, unfortunately, we are not prepared.

I see communities constantly surprised by the severity of these events, although the science has told us that this is coming, and it's coming actually more quickly than originally anticipated.

But, unfortunately, we have built all of our structures, made our land use choices on the assumption that the past will resemble the future.

Climate Change upends that assumption.
And our infrastructure fails as a result.

We now see 4 to 5 times more extreme events than we did in the 1970s."

Sophia Cassam

From:	Jan Alderton <janetmalderton@gmail.com>
Sent:	Thursday, September 9, 2021 5:38 PM
To:	Sophia Cassam
Subject:	Flood Zone Docket Request Comments
Attachments:	Flood Zone Docket JA.docx

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.

Dear Sophia,

Please share my comments on the requested Comprehensive Plan Amendment, Request 21-0004—Floodplain development proposal, with Councilors Wolf, Minnie, and Stephens.

Thank-you,
Janet Alderton
Orcas Island

This request seeks a Code revision so that agricultural and accessory structures could be built in Special Flood Hazard Areas without a variance if they were constructed of flood damage resistant materials and/or built to allow water to flow through them. Currently, such structures must be elevated to avoid flooding impacts unless an applicant obtains a variance to construct them in flood zones. Staff recommend against this revision in large part because the option is available with a variance. I support the staff recommendation and believe that the variance process will allow such construction "where appropriate" while protecting important flood zones from impacts of that development.

I have been pondering the "where appropriate" and cannot think of an example.

When I last looked at the FEMA Flood Maps for San Juan County several years ago, the inundation areas were all along our shorelines. I just checked them out again:

https://msc.fema.gov/portal/search?AddressQuery=Friday%20Harbor%2C%20WA#searchresultsanchor

They still are along our shorelines between the low and high tidal elevations.

Therefore, I am confused about what type of agriculture would be occurring in these "flood prone" areas.

Would it be shellfish "farming"? Most (all crops?) do not grow well under salty conditions. Maybe someone is thinking about kelp farming? As far as I know, kelp farming does not require overwater structures.

If we are thinking about terrestrial flood zones, would these be wetlands? I thought building was forbidden in wetlands.

Sophia Cassam

From: Jan Alderton <janetmalderton@gmail.com>
Sent: Thursday, September 9, 2021 7:17 PM
To: Sophia Cassam
Subject: Tree Conservation Docket Request 21-0005
Attachments: Tree Conservation docket JA.docx; Wanton Wetland Destruction.pdf

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Dear Sophia,
Please share my following comments with the county councilors.
Thank-you!
Janet Alderton
Orcas Island

Request 21-0005—Tree conservation code provisions

This request seeks to: (1) to consolidate all Code provisions regarding trees in one location; and (2) add general tree retention and protection standards to the Code.

The new tree standards would: (a) protect trees from unintentional destruction during construction; (b) maintain tree canopy; (c) establish general tree retention standards; and (d) protect significant and exceptional trees and groves.

Staff recommends against consolidating all tree protections into one code location and did not provide a recommendation on whether to take up the new tree standard proposal. To avoid confusion, I agree with staff that the tree protection standards in the Shoreline Master Program and Critical Areas Ordinance should not be consolidated into a single section.

The allowance of Timber Harvest in the Shoreline Master Program for San Juan County makes no ecological sense and is contributing to the on-going decline of salmon and the endangered Southern Resident Killer Whales (orcas). Allowing timber harvest along our shorelines has certainly led to confusion among some property owners who think this means they can remove as many trees as they might wish. The tree provisions in the shoreline zone are written in a confusing manner. Although I have long been interested in ecology and forests, the shoreline tree "protections" baffle me. The dot-matrix method of estimating tree canopy seems difficult to use when standing on terra firma. Maybe one needs a drone equipped with a wide-angle camera.

I think that the general complexity and confusing language used in the San Juan County regulations prevents ordinary people from even trying to understand and "do the right things". More often, people just do as they wish. And our staff in the Department of Community Development is too overwhelmed to do much to change this dynamic.

Yes, I do support San Juan County enacting tree standards similar to those provided by Mr. Becker because our county code does not provide general tree protection language. I walked my five shoreline acres today with an eye for comparing some of Mr Becker's suggested tree metrics to what exists on this dry, rocky shoreline in Deer Harbor on Orcas Island. The tree diameters on my parcel are definitely on the lower end of the ranges listed in the tables. Some impressive stumps exist on my land that show Douglas firs once had trunks approaching three feet in diameter. Currently, the largest Doug Fir has a two-foot diameter truck at breast height. So I would recommend that local San Juan County forest ecologists create the "tree points" tables that might take local rainfall variations into account. The east side of Orcas has around 50% more rain than dry Deer Harbor. Our Climate is warming and rainfall patterns are changing.

Then there is wildfire risk…
I would find it so valuable to have people with forestry/wildfire mitigation expertise in our San Juan County Conservation District Department. Funding would likely need to come from an additional levy/tax, but the resulting savings in disaster mitigation would be tremendous.

I know that Friends of the San Juans regularly fields calls from community members who are concerned about non-forestry clear-cutting of lots and who then become distressed to learn that much of the extensive tree cover we enjoy in the islands is not protected and has been retained more by accident than intent. As president of the board of directors, people call me in distress (see the attached Polaris image "Wanton Wetland Destruction"). There is really nothing to be done without new protections that are meaningfully enforced. Maybe contractors who illegally cut down trees could be fined along with the property owner.

Our island trees provide many benefits beyond beautiful landscapes and rural character – from essential habitat to carbon sequestration to erosion control and aquifer recharge and more!

I strongly support the adoption of general tree standards. The sample language from Mr. Becker provides an excellent starting point.

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 = 170 feet

0 0.015 0.03 mi

N

Wanton Wetland destruction

Polaris

Date: 6/9/2021

Time: 2:54:33 PM

Sophia Cassam

From:	Jan Alderton <janetmalderton@gmail.com>
Sent:	Thursday, September 9, 2021 2:39 PM
To:	Sophia Cassam; Cindy Wolf
Subject:	Stormwater Docket Comments
Attachments:	JA Stormwater Docket.docx

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.

Sophia,
Please find below and attached my comments on docket request 21-0008, proposed Comprehensive Plan Amendment:

"Proposed amendment to Comprehensive Plan Section B, Element 4 Water Resources Draft May 19, 2020,
Section 4.5 Storm and Surface Water Management, p.7"

Thank-you for sharing my comments with our county councilors.

Janet Alderton
Orcas Island

Councilor Wolf,
I appreciate your thoughtfulness and hard work!
Janet

Request 21-0008—Stormwater code updates

This proposal would amend the Comprehensive Plan and update the County Code with language consistent with current stormwater standards to improve environmental protection, address stormwater runoff, control erosion and sedimentation, and promote aquifer recharge.

Staff have already identified the need to update the stormwater code and propose adding the Comprehensive Plan language during the current update and to take up the stormwater regulation update in 2022-23.

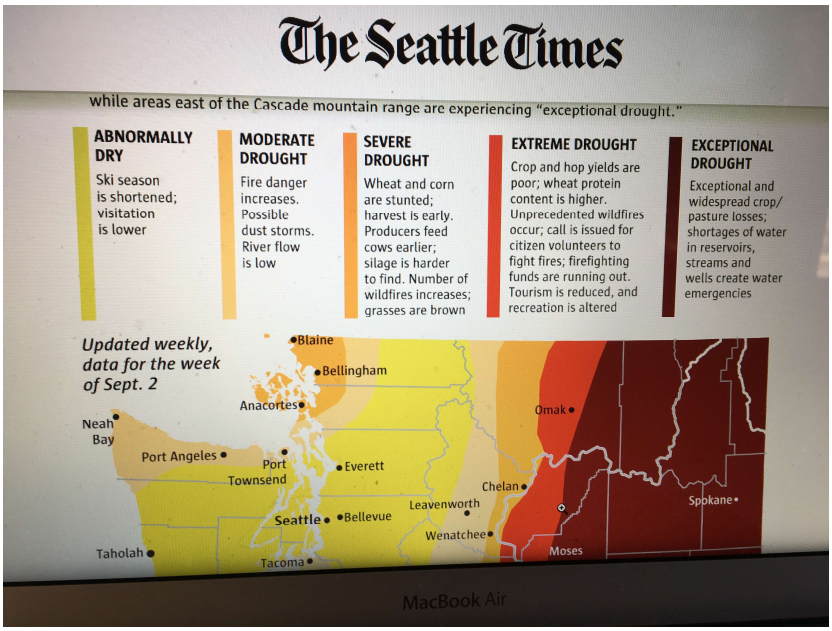
DCD Staff have recommended that this Docket Request have the highest priority.

I agree because the requirements in Alexandra Gayek's request will reduce stormwater runoff and promote aquifer recharge.

Aquifer recharge is already limited. Ensuring that aquifer recharge does not steeply decline as more development occurs will require the measures that are proposed in this docket request. Future rainfall patterns are predicted to concentrate precipitation in heavier and less frequent storms. Stormwater handling will become more challenging. At the same time, population growth will increase water demands. Development will replace the natural areas that promote aquifer recharge (forests, shrublands, meadows, and wetlands) with more and more impervious surfaces. The creation of more and more roofs and driveways, decks and patios, and the access roads to these new homes will collectively create larger pulses of stormwater. Longer periods without rain, like the one we are experiencing, are predicted. (See the drought map below that indicates our islands are experiencing "severe drought" for the week of Sept. 2, 2021.)
To better communicate with people who are not stormwater professionals, please preface the regulations with explanations of why these restrictions and requirements are necessary. Please create the new regulations using ordinary language, if possible. And please provide graphics for those of us who need this extra help to understand.

Thank-you for your attention!

Janet Alderton
Orcas Island


The Seattle Times
while areas east of the Cascade mountain range are experiencing "exceptional drought."
ABNORMALLY DRY
Ski season is shortened; visitation is lower
MODERATE DROUGHT
Fire danger increases. Possible dust storms. River flow is low
SEVERE DROUGHT
Wheat and corn are stunted; harvest is early. Producers feed cows earlier; silage is harder to find. Number of wildfires increases; grasses are brown
EXTREME DROUGHT
Crop and hop yields are poor; wheat protein content is higher. Unprecedented wildfires occur; call is issued for citizen volunteers to fight fires; firefighting funds are running out. Tourism is reduced, and recreation is altered
EXCEPTIONAL DROUGHT
Exceptional and widespread crop/pasture losses; shortages of water in reservoirs, streams and wells create water emergencies
Updated weekly, data for the week of Sept. 2
Blaine
Bellingham
Anacortes
Neah Bay
Port Angeles
Port Townsend
Everett
Seattle
Bellevue
Taholah
Tacoma
Leavenworth
Wenatchee
Chelan
Omak
Spokane
Moses
MacBook Air

Sophia Cassam

From: Naomi Aldort <naomi@aldort.com>
Sent: Thursday, September 9, 2021 6:24 PM
To: Sophia Cassam; San Juan County Council
Subject: docket 21-0003

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.

To: SJC planning commission,

The official projection of the islands' population and tourism growth is the destruction of this county. Please support docket request 21-0003.

Please support the docket request 21-0003 as your fellow Planning Commission members did in 2000 and again in 2018. The vision statement says that these islands are to stay rural and protective of beauty, quiet and the natural environment. We are already above the residential and tourists capacity to fit the vision statement. In addition to limited water, our quality of life depends on limited roads, clean air and rural quiet lifestyle. We do not wish to expand any more. This problem cannot be ignored. Please support the docket request 21-0003.

Thank you, Naomi

"Transforming parent-child relationship from reaction and struggle to freedom, power and joy." -
Naomi Aldort
To discuss your parenting and other concerns with Naomi: https://www.naomialdort.com/about-naomi-aldort/parenting-guiding-sessions.html

Naomi Aldort
Author, Raising Our Children, Raising Ourselves
https://naomialdort.com
Parenting Skype/phone-sessions internationally
Facilitator of self-realization through parenting
Piano and classical music lessons
(360)376-3777
POB 1719 Eastsound, WA 98245, USA
naomi@aldort.com

Sophia Cassam

From: Shaun Hubbard <shaunalice@gmail.com>
Sent: Thursday, September 9, 2021 7:46 PM
To: Sophia Cassam; Christine Minney; Cindy Wolf; Jamie Stephens
Subject: Comments re: Annual Docket and Comprehensive Plan
Attachments: SJC_Comp_Plan_Comments_Hubbard_Sep9_2021.docx

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Dear San Juan County Council Members:
Please see the attached comment letter regarding the Annual Docket and Comprehensive Plan.
Thank you.
—Ms. Shaun Hubbard

September 9, 2021

San Juan County Council
c/o Sophia Cassam sophiac@sanjuanco.com
County Council District 1: Christine Minney christinem@sanjuanco.com
County Council District 2: Cindy Wolf cindyw@sanjuanco.com
County Council District 3: Jamie Stephens jamies@sanjuanco.com

Dear Council Members,

Welcome to the newly-elected of you! I am writing to add my two cents to the Comprehensive Plan discussion. I regret I have not had the time and energy to study all the particulars of the plan – time and energy that matches the passion I feel for protecting the natural resources of the islands. My excuse is needing to spend that time and energy in caring for my elderly mother in Seattle.

My mother was born on San Juan Island in 1925 as a 4th-generation islander in a family of both valley farmers and town business owners. She saw a different island then. I feel fortunate to still have her around to hear what island life was like for her growing up. Much of that beauty and way of life still exist, but they're going fast – within one short lifetime. It's not too late to protect what we still do have, but only if we act now.

For protection of the islands my mother knew, I am in full agreement with the letter submitted to you from Ms. Janet Alderton of Orcas Island. Ms. Alderton made two points about which I am especially concerned and would like to reiterate here:

Docket 21-000, Build-out Analysis
I request that the County do a thorough build-out analysis. This basic, foundational knowledge is crucial to establishing all County policies for the future. How can educated decisions be made without this valuable information? Without it we'd just be guessing and, knowing we humans, guessing incorrectly. It's a big job and it's an important job – too important to delay or do half-way. I think of the proverb, "The best time to plant a tree was 20 years ago. The second best time is now." Let us be the ones to do this – now!

Drinking Water
Water is finite. Do we know how much we have? Do we have enough to sustain those who already live here? An adequate water supply is required for those currently living in the islands and for the growth that is projected. How can we know if we are meeting that requirement unless we know: a) how much water we have, and; b) what our projected growth (build-out) will be?

Please place knowledge and protection of our islands' drinking water supply at the top of the list while doing a thorough build-out analysis.

Thank you for your consideration of these comments.

Ms. Shaun Hubbard
shaunalice@gmail.com

Sophia Cassam

From: clkibble <clkibble@gmail.com>
Sent: Thursday, September 9, 2021 11:56 AM
To: Sophia Cassam
Cc: Christine Minney
Subject: Comment on the County's 2021 Annual Docket for the Comprehensive Plan

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Sept 8, 2021,

San Juan County Council
c/o Sophia Cassam
SJC Department of Community Development
PO Box 947
Friday Harbor, WA 98250
sophiac@sanjuanco.com

Thank you or the opportunity to comment on the County's 2021 Annual Docket.

I am a proud resident of San Juan Island since 2010 and feel lucky to have a home here. I came here also as a child with y family on summer boat trips, which I consider a highlight of my childhood. I eared to love and honor Nature here which has been a mainstay of my life.

These are momentous and crucial times we are living in. I am deeply concerned about the future of my precious island home, which includes not just my dwelling and surrounding acreage, but the entire San Juan County - and our entire planet! "Think globally, act locally" has been my motto for most of the 75 years of my life, and I seek to do that now by my board membership in the Friends of San Juans and by becoming a member of the Comp Plan Action Team, headed up by our Friends executive director, Brent Lyles. His latest recommendations to the Planning Commission and County Council mirror mine in regards to the areas of most importance on the Annual Docket to be considered by the County Council on Sept 14 at the public hearing, are as follows:

1) 21-0001 - Commercial Composting on Agricultural Resource Lands - DISAGREE with the Planning Commission recommendation to allow large industrial composting operations on highly valuable Agricultural Resource Lands

2) 21-0003 - "Build-Out Analysis" - DISAGREE with the Planning Commission's recommendation that such a study is not feasible or valuable. County Staff convinced the PC of this due to the size of the project. Brent's comment: "Given the realities of rapid development in our County and the climate crisis, the information that our County would get from this analysis is just simply too important to kick this can down the road any further."

3) 21-0005 - Creating New Tree Protection Standards - AGREE with the PC's and County Staff recommendation to move forward on this.

4) 21-0008 - Creating New Stormwater Management Regulations - AGREE with the PC recommendations

I look forward to seeing where the Council will take these recommendations, and hope that it will have an impact on your decisions. Unfortunately, I cannot attend the Sept 14 Council meeting, but I intend to become more involved in this democratic approach to planning our future

Thank you,

Carol Kibble
149 Lakeway Drive
Friday Harbor, WA 98250
(206)459-8361
clkibble@gmail.com

Sophia Cassam

From: mparnell@rockisland.com
Sent: Thursday, September 9, 2021 8:31 PM
To: Sophia Cassam
Subject: Reject Docket 21-0003

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Please reject putting this docket from the radical, minorities effort to restrict property owners, current and future, from being able to utilize their property to provide housing, reduce dependence on tourism only, and allow long time, fixed income residents to Stay in the islands.

Mike and Dawn Parnell

Sent from my iPhone

Sophia Cassam

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 residental 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 may 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

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 incomprehsensible 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)

—

KeepSanJuansWild.org

EDITORIALS

★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
2021-05-17_2021 Docket_PUB_Bettis_Support Request 21-0003 PDF
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_Uhlir 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 in 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=
also: https://www.sanjuanco.com/DocumentCenter/View/18555/2019-06-04_DCD_GDLI_LCA_Method_w-ATT_Zack_PCCC_June_2019?bidId=

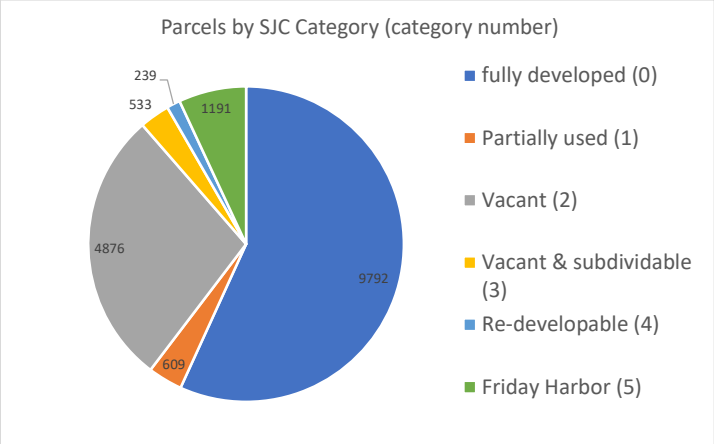
The data and charts shown here were extracted and created by Joe Symons using SJC's GDLI information (see below) in summer, 2019

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

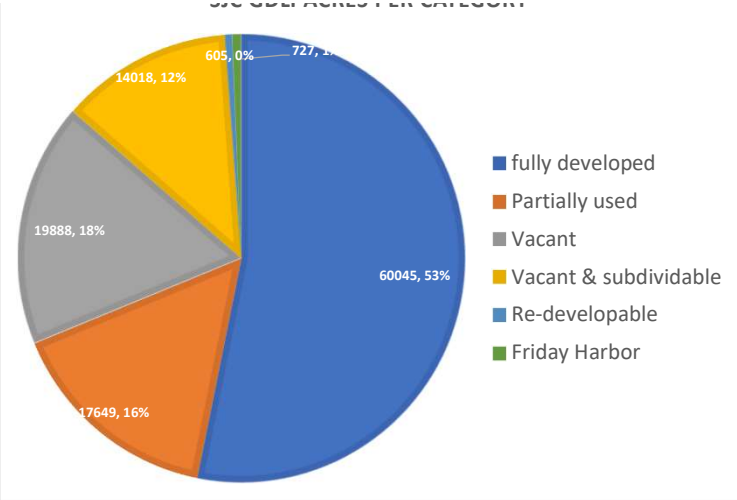
category	count	%
fully developed (0)	9792	56.8%
Partially used (1)	609	3.5%
Vacant (2)	4876	28.3%
Vacant & subdividable (3)	533	3.1%
Re-developable (4)	239	1.4%
Friday Harbor (5)	1191	6.9%
total	17240	100.00%



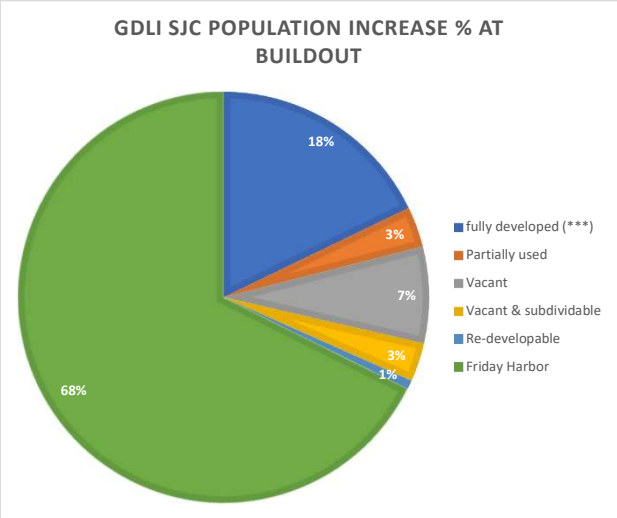
SJC GDLI ACRES PER CATEGORY

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	ttl 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	43354
Friday Harbor	1191	43298	44489	3735%	90758	
total					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.

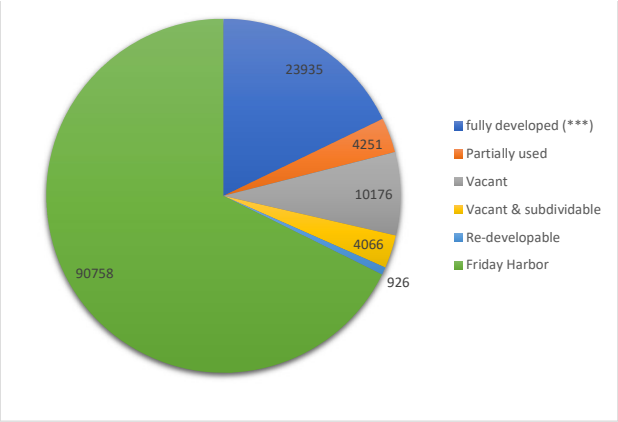
(**) at 2.04 persons/structure

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

	total population
fully developed (***)	23935

SJC GDLI buildout population by category

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	**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)

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

Land Use Designation[1,2]	1998 Designation			2000 Designation[2]			Average Parcel Size (acres)			
	Existing Parcels	Area (ac)	Potential Units[3,5]	Existing Parcels	Area (ac)	Potential Units[3]	1998 Existing	1998 Buildout	2000 Existing	2000 Buildout
Resource Lands (excluding state and federal lands)										
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
Total Resource Lands	1,228	32,222.8	4,143	1,131	31,072.0	2,039	26.2	7.8	27.5	15.2
Rural Lands (excluding state and federal lands)										
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
Total Rural Lands Not in Activity Centers[5]	11,843	62,801.2	20,262	11,597	63,615.9	15,185	5.3	3.1	5.5	4.2
Village, Hamlet and Residential Activity Centers[3,4]	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
Total Rural Lands[5]	13,428	65,622.2	35,506	12,588	65,331.0	16,413	4.9	1.8	5.2	4.0
Master Planned Resorts	30	435.9	859	30	435.9	489				
Eastsound, Lopez Village, Friday Harbor UGAs	17	5.1	*	954	1,447.1	*				
Total Unincorporated	14,703	98,286.0	*	14,703	98,286.0	*				
State and Federal Lands in Unincorporated Areas[6]	159	13,042.9	2,426	159	13,042.9	283	82.0	5.4	82.0	46.1
Total Unincorporated With State and Federal Lands	14,862	111,328.8	*	14,862	111,328.8	*				
Town of Friday Harbor	932	785.7	*	932	785.7	*				
Total County	15,794	112,114.5	*	15,794	112,114.5	*				

* 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.

San Juan County Planning Department *ParcelPlanDen2kStateFed.xls* 01/09/2001 8:00

260166

Sophia Cassam

From: David Turnoy <davidgeri@rockisland.com>
Sent: Thursday, September 9, 2021 5:52 PM
To: Sophia Cassam
Subject: Fwd: Docket Request for Buildout Analysis

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.

From: "davidgeri" <davidgeri@rockisland.com>
To: "council" <council@sanjuanco.com>, "sophia" <sophia@sanjuanco.com>
Sent: Thursday, September 9, 2021 5:48:26 PM
Subject: Docket Request for Buildout Analysis

Dear County Council and Sophia,

A small group of people has been working for 30 years to preserve the quality of life we enjoy here in the San Juan Islands. Participants have come and gone, but the one constant throughout this whole period has been Joe Symons. Joe and a few others spent the 1990's working to try to get the county to bring the Comprehensive Plan (CP) into compliance with the Growth Management Act (GMA). Joe and friends eventually won in court, but nothing of substance was done to address the violations. (You can read about this at http://www.doebay.net/appeal.html.) Next Joe submitted a formal docket request to the Planning Commission (PC) in 2001 asking for a truth in planning document, basically a version of the Comprehensive Plan in layman's terms. The PC reviewed the request and unanimously voted that it should be done and be given the highest priority of county government. Unfortunately, this request was ignored by the County Council (CC), and there has been no further action taken in the last 20 years. Joe renewed his request in 2018 and 2019, but both applications were rejected by the CC. We now have a new council, and Joe is renewing his request once again including a request for a Build-Out Analysis (BOA).

If you have ever looked at the Vision Statement that is supposed to be the guide for the rest of the Comprehensive Plan, the following sentence encapsulates the vision well: "We…recognize that these rural islands are an extraordinary treasure of natural beauty and abundance, and that independence, privacy and personal freedom are values prized by islanders." The vision calls for all of us to be good stewards of our primarily rural environment. Unfortunately, the Vision Statement has never been operationalized into specific actions, rather, it sits on a shelf while the county continues to grow. Instead, the density map still on the books from 1980 has never been examined for consistency with the Vision Statement, and these regulations could easily lead to an eventual full-time population of 70,000 in the county; visitors would be in addition to that.

How many people can live in our county while still being true to the Vision Statement? We don't know, as a BOA has never been done. The BOA would include an impact analysis focused on themes from the official Vision Statement including the environment, transportation, housing, sense of community cohesiveness and the fiscal implications of new development on government services. [For every new residence bringing in $1 in tax revenue, the county spends $1.32; in other words, growth does not pay for itself.] And how about water? How many people can our available water resources support without expensive desalination and water hauling? Hopefully a water inventory will be done shortly, as Senator Lovelett sponsored and got approved funding for this in the state senate.

As of last year, our population was 17,340. Our population easily doubles in the summer. If build-out could reach 70,000, we are looking at possibly 140,000 people here in the summer. If we are to plan intelligently for the future, we need to know what our county will look like when the build-out population is reached, which is why we need a BOA completed. If the impacts found from the BOA violate our Vision Statement, we must change our regulations to honor the Vision Statement.

If you would like to look at Joe's docket request to read more detail about his BOA request, go to doebay.net/sunshine/Docketsubmission2021.pdf. Two other good links where you can explore the context of the big issues involved can be found at http://www.doebay.net/appeal.html and at doebay.net/bigpicture.pdf. In addition, http://doebay.net/appeal/pathlessibook.pdf is a site where you can find related essays.

I would like the county to do an analysis of how many people can live here without changing our quality of life. This may be called a build-out analysis, a carrying capacity analysis, or a truth in planning document. I encourage the Commissioners to ask the county council to direct county staff to undertake this study.

Thank you,
David Turnoy Orcas Island

Sophia Cassam

From: jbeeman haller-beeman.com <jbeeman@haller-beeman.com>
Sent: Friday, September 10, 2021 1:36 PM
To: Sophia Cassam; San Juan County Council
Subject: Support for Docket 21-0003

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.

Dear County Council,

I would like to support the notion of a better, and public, San Juan County buildout plan. The islands are
particularly finite when it comes to water, food supply, transportation, energy, garbage... support of all kinds. Given our ferry-based
transportation system, all services are particularly susceptible to limits. The notion that the population could grow to 134,000 (plus visitors) is particularly unrealistic. I would strongly support a much
lower number and also support a SJC-specific study of island carrying capacity. An impact study is, at the very least, required for further growth to avoid a "collapse of the commons." Please let me know if there is
anything the residents of SJC can do to help make this study happen.

Sincerely,

Jeffrey Beeman
76 Hawk Hill Lane
Orcas, WA 98245

Sophia Cassam

From: E. Hartmann <ehartmann7@gmail.com>
Sent: Friday, September 10, 2021 8:02 PM
To: San Juan County Council; Sophia Cassam
Subject: Docket 21-0003, buildout/impact request

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.

To the SJC Planning Commission and the County Council:

RE: Docket 21-0003, buildout/impact request

Please protect our rural county's traditional character by capping building and population growth as appropriate to our resources — agriculture, forests, fresh water supplies, transportation, essential services to support a small population of permanent residents occupying traditional housing, limits on oversized seasonal dwellings that drain resources, and resilience to survive catastrophic events. Employment opportunities for residents should be year-round and reliance on the seasonal tourism industry should be reduced.

My ideal would be a self-supporting community reliant on local food production, businesses and industries dedicated to local needs and interests, with locally generated power.

Most of all, we honor the island residents whose forebears first settled here and established the productive community that arose from their efforts. San Juan County must not become a suburb of the urban mainland.

Thank you for hearing our community's wishes.

Eleanor Hartmann
90 Two Barn Farm Lane
Friday Harbor, Wa 98250
360-370-5430

Sophia Cassam

From: paulh@centurytel.net
Sent: Friday, September 10, 2021 8:46 AM
To: Sophia Cassam; San Juan County Council
Subject: Docket Request 21-0003

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.

Dear Council members,

I have been a full time resident of San Juan County since 1978. When I arrived on Lopez Island the Comprehensive Plan had recently been adopted and there were various opinions on it and its effectiveness. I have seen the islands change radically in the past 43 years. Some of these changes I have welcomed. Some, like turning agricultural lands and forests into residential plots, are very worrying to me. Where do we draw the line on growth and development?

This is a question, (paraphrased) that I have heard many times, in many forms since 1978: "How many people can these Islands support and still retain its rural character and all the things that we moved here to experience?"

The Council has received over 80 letters requesting that the question be answered. Many of those letters express the concern eloquently and concisely, and I can not improve on them. I urge the County Council to put Docket 21-0003 on the work plan for DCD as part of the process for completing the Comprehensive Plan update. Please perform a Build Out Analysis.

I appreciate how difficult it will be to address and implement our growth management issues and appreciate your attention to this critical issue.

Respectfully,

Paul S. Henriksen

Lopez Island

Sophia Cassam

From: Gregory Kramer <gregory@metta.org>
Sent: Friday, September 10, 2021 1:46 PM
To: Sophia Cassam; San Juan County Council
Subject: Re: Support for Docket 21-0003

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.

Dear County Council,

I am concerned about rational, sustainable growth of the SJC population and housing.

I support the development of a better, and public, San Juan County buildout plan.

The islands are not only finite in their land mass. There are limits of water supply, transportation, energy, solid waste, and other essential aspects that are directly correlated with population growth. Even the ferry system is fine and already stressed.

I challenge the notion that the population could grow to 134,000 (plus visitors). This is wildly unrealistic. I strongly support a much lower number and also support a SJC-specific study of island carrying capacity. An impact study is, at the very least, required for further growth to avoid degradation of our lifestyle and even a collapse of this fragile ecosystem.

I appreciate the work you are doing to steward our island homeland.

Sincerely,

Gregory and Martha Kramer
414 John Jones Road
Orcas, WA. 98280

Sophia Cassam

From: Tracy Oniya <taoniya@gmail.com>
Sent: Friday, September 10, 2021 8:12 AM
To: Sophia Cassam
Subject: Docket Request 21-0003

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 urge the County Council to put Docket 21-0003 on the work plan for DCD as part of the process for completing the Comprehensive Plan update. Without knowing what the current legal buildout numbers are, we cannot move forward with effective planning. I have been a resident of this county since 1985, and a landowner since the mid 90's. I am vitally interested in this data. As a collection of islands, we have limited capacity for growth. Without knowing what our current maximum population numbers would be at full build out, we are shooting in the dark when it comes to growth. Good government requires that this study be completed. All of our planning must be constrained by available water, how we can deal with our waste stream, the impact of our sewer systems, the impact on our infrastructure, as well as our vision for the nature and size of community we wish to live in.

Thank you,
Tracy Oniya
Orcas Island Homeowner

Sophia Cassam

From: Molly Roberts <mollyroberts8@rockisland.com>
Sent: Friday, September 10, 2021 1:26 PM
To: Sophia Cassam
Cc: San Juan County Council
Subject: Docket Request 21-0003

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 urge the County Council to put Docket 21-0003 on the work plan for DCD as part of the process for completing the Comprehensive Plan update.
Sent from Mail for Windows

Dear Sophia,

In my view of our situation our dilemma can be illustrated thusly:

Person B – "We're sitting on a Gold Mine here!!"

Person A – "Hey, that's my backyard you're talking about!"

Recently there's been a heck of a lot of activity on the part of the Person B's.

The Person A's have been enjoying their "backyards" (especially those that *have* an actual backyard) and relatively few of them have been rattling the County's cages.

I have lived on Orcas since 1971 and feel very grateful to have a backyard in the original OPAL neighborhood since 1996. You can count me as a cage rattler.

Molly Roberts

(Mary S. Roberts)
360-376-6333

Sophia Cassam

From: Szabmish <szabmish@aol.com>
Sent: Friday, September 10, 2021 10:09 PM
To: Sophia Cassam
Subject: County's 2021 Annual Docket ("Docket")

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.

Dear San Juan County Council Members:

Thank you for the opportunity to comment on the County's 2021 Annual Docket. The following four issues are of particular concern since they will affect the quality of life on the islands.

1. REQUEST 21-001, Commercial Composting on Farmlands, I strongly DISAGREE with the recommendation to install commercial composting facilities on designated Agricultural Resource Lands. While commercial composting facilities would be desirable, I urge the County to protect the valuable agricultural lands for the purpose intended, that is, agriculture, and use non designated Agricultural Resource Lands for commercial composting.

2. REQUEST 21-003 - Resource Capacity Analysis. As a resident of Lopez Island, and a witness to the extensive land development in the County in recent years and the current climate crisis, I STRONGLY ENCOURAGE AND SUPPORT a build-out analysis. I support the request to prepare a resource capacity analysis that takes the results of the County's 2018 Land Capacity Analysis and evaluates the impact of that buildout on our community's quality of life, especially on our water, to include a review of water availability to serve both the legal amount of water that can be withdrawn and the amount of water likely to be used based on current use patterns and trends indicating increased use.

3. REQUEST 21-005- Tree Conservation Code Provisions. I strongly agree that the County enact tree protection standards.

4. REQUEST 21-008 - Storm Water Code Updates. I support the staff's recommendation to update the stormwater code.

Sincerely,
Clarissa Szabados-Mish
203 Chickadee Lane,
Lopez Island,

Sophia Cassam

From: Steve Ulvi <srulvi@gmail.com>
Sent: Friday, September 10, 2021 11:04 AM
To: Sophia Cassam
Subject: Comments on 2021 Docket

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The planning staff should create some kind of build-out analysis with specific attention to the limits of fresh water usage. The current real estate boom in both existing housing and raw land is just the first in many to follow as climate change refugees and people seeking to leave turbulent urban areas continue into the future. This increase in population and land use is not a blip. It will be a continuing pressure on our resources and ability to sustain ourselves as a resilient community. There must be enough ground water OVER AND ABOVE NOW EXPANDING RESIDENTIAL AND COMMERCIAL NEEDS to allow new farms and ranches to expand as our primary reliance on food goods from outside the county changes in response to rising prices in fossil fuels at industrial farms and truck transport to address carbon emissions.

There are probably nuances lost on me in the current zoning of the county but I support commercial composting on designated ag resource lands as well as in the other zones. The claims that commercial composting has to be a huge industrial process and is therefore incompatible is a red herring. It seems to me that a farm or ranch on ARL may well be the most appropriate location for creating a commercial composting operation. Such an operation is sorely needed and reducing the acreage upon which a business can be established is counter-productive. The permitting process should adequately address unacceptable effects to resources and neighboring uses. It seems likely to me that there would be fewer NIMBY reactions to a moderate scale composting facility on existing ARL. We are small in population and even with rapid growth as seems likely, our volume of compostable waste will not be of industrial proportions. Composting is a traditional farming/ranching activity.

Thank you for your consideration of these comments.

Steve Ulvi
San Juan Island

Sophia Cassam

From:	A R Weisbrod <weisbrod@rockisland.com>
Sent:	Friday, September 10, 2021 3:33 PM
To:	Sophia Cassam
Cc:	SJC County Council
Subject:	Docket 21-0003, buildout/impact request

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.

To the SJC Planning Commission and the County Council:

RE: Docket 21-0003, buildout/impact request

Please act to better align our County Vision with its current actual practice in granting unlimited building in the County. So far we talk a good talk, but I want to insist that we walk the walk as well.
Many of us come to live on these islands because they are our idea of an island paradise. How many people can live in paradise before it becomes ruined? Do we want to find out (or have our children find out and blame us for it)?
We know we have limited water; all of us are keenly aware of that in this drought year!
We know and value the peace and quiet, even when the tourists are here, but especially during the off-season.
We advertise to tourists that we are a place of great natural beauty. How long will we remain so if we do not plan for our future ? Not long, I believe.
We need careful study by experts of our limitations in both physical and social resources.
I beg you: WALK THE WALK!

Rita R Weisbrod, PhD
141 Frog Song Trail
Friday Harbor, WA 98250
~~~
~~~

Phone: 360.378.5460
E-mail: weisbrod@ rockisland.com

Sophia Cassam

From: Jan Alderton <janetmalderton@gmail.com>
Sent: Saturday, September 11, 2021 3:24 PM
To: Sophia Cassam
Subject: 2021_Docket_Bennett_UDC_21-0001

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.

Dear Sophia,
Please share my comments on the 2021 Docket item UDC 21-0001 with the County Councilors Wolf, Minnie, and Stephens.

Dear Councilors Wolf, Minnie, and Stephens,
I think there was some initial confusion surrounding Mr. Bennett's docket request.
The scale of commercial composting that he is describing is not "industrial" or "urban".
"Commercial" indicates that a product or service would be supplied in exchange for money.
The word "commercial" does not indicate scale.

It is true that Agricultural Resource Lands are limited in our islands and therefore are extremely valuable.
Because of this, any owner who farms Agricultural Resource Lands is unlikely to locate their composting operations on the best soils on their acreage.

The commercial composting operation on Lopez Island at Midnight's Farm is an example of what I think is needed in our islands. Local vegetation is brought to the composting site where it is processed into compost. The compost is then either used on the farm or sold to people in the Lopez community. I have heard from a neighbor of Midnight's Farm that the composting operations cause her no distress. Sounds good to me!

Maybe a restriction could be added to prevent composting operations from exporting their compost outside of San Juan County? This way our local soils would be enriched and the scale would be limited. Something to consider.

I stopped using burn piles years and years ago. Instead, I have a rather untidy miniature compost "mountain". Little critters love it! After the awful heat dome event, I noticed a tiny bright green "tree frog" in the salal next to my compost "mountain". Somehow a frog had survived even though the nearest (a very tiny puddle pond) water is more than 300 feet away.
And baby garter snakes live in the compost mountain, too!
Compost is golden.

Janet Alderton
Orcas Island

Sophia Cassam

From:	Jan Alderton <janetmalderton@gmail.com>
Sent:	Sunday, September 12, 2021 7:20 AM
To:	Sophia Cassam
Cc:	Cindy Wolf; Christine Minney; Jamie Stephens
Subject:	Reducing Risk: Docket Requests 21-0008 & 21-0005
Attachments:	Docket 21-0008 Reduce Risk.docx

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.

Dear Sophia,
Please post my comments below on the Comprehensive Plan Docket Requests comments site.
Thank-you so much!
Janet Alderton
Orcas Island

The Responsibility to Reduce Risks

I think my daughter's fate to become a civil engineer was sealed by two events:
I left a book titled "Why Buildings Fall Down" lying around our house when she was 12 years old.
And she was fortunate enough to have a woman civil engineer teach her Advanced Placement physics class in high school. Her teacher's husband had received a job offer that required them to relocate. As a result of their decision to place his career advancement above hers, my daughter was given a real life female civil engineer as a role model.

Quirkiness evidently runs in my family because my daughter began her essay for admission to the School of Civil Engineering at the University of California Berkeley with a humorous limerick about a civil engineer. She was admitted either because of or despite this limerick -we will never know.

She eventually received a master's degree in earthquake engineering - also at UC Berkeley.

Having a civil engineer in my family is probably why I keep referring to the "laws of physics" in my comments to you, our county decision makers.

Water flowing downhill over impervious surfaces is something that happens. You can say, "Oh, I would rather not think about it." But stormwater flows will happen regardless.

As the ultimate decision makers in San Juan County, it is your responsibility to acknowledge risks and reduce their impacts with thoughtful policy and code changes.

Civil engineers design structures and, in my daughter's case, earthquake and landslide risk reduction plans (funded by the World Bank) for entire countries, using the best available science. The engineering team doesn't just "consider" the science; they actually "follow" the science.
They design not for "average" risk, but for maximum predictable forces. Then they add extra design measures to avoid catastrophic collapse caused by unpredictable events.
For earthquake and landslide risk reduction, the plans show which places to avoid concentrating development, and especially avoid siting critical infrastructure. Design of individual projects is important in reducing risk as well.

Here is where this applies to San Juan County:
As more and more land is developed, more and more impervious surfaces are created. If we continue "business as usual", this will predictably result in greater damage from erosion, flooding, and landslides. <u>And less aquifer recharge</u>. Taking peak predicted loads into account in San Juan County

would consider peak population during tourist seasons. And then there is designing for the unexpected -the prolonged extreme drought, for example. Maybe we should call this "expected".

This is why Alexandra Gayek's Docket request 21-0008 deserves careful consideration. It addresses how to mitigate the inevitable increase in impervious surfaces that will accompany development in San Juan County.

Alexandra's suggestions must not only apply to new development; mitigation measures must also be required for existing development. If the new standards are only required for new development, the risk reductions will be too little and too late. Changes must be incorporated into our building codes in addition to just stormwater handing requirements. Building design affects the amount of stormwater produced.

The risks that will be addressed by these code changes are not only erosion, flooding, and landslide risks. The threats to our islands' water supply will also be reduced. We do not understand the limitations of our aquifers because they have been inadequately studied. But two things are certain: the capacity of our aquifers is limited and their recharge rate depends on slowing stormwater and allowing it to infiltrate our soils. Saltwater intrusion in wells near our shorelines can happen suddenly. The water in these salt-contaminated aquifers is then lost for human use.

Insisting on maintaining the attitude that "San Juan County is different" and that the laws of physics can be ignored is irresponsible.

The increase in our population has accelerated due to the pandemic and due to the perception that San Juan County is a refuge from Climate Change.

This “Fortress San Juans” attitude is obviously flawed.
You don’t need a precise buildout analysis to recognize that we are resource limited -especially by water.

A Medieval Fortress situated on a hill and surrounded by a moat may that seemed protected from assault. But a sustained attack would eventually cause the fortress inhabitants to run out of food and water.

The combination of accelerated population growth and Climate Change needs to be viewed as just such a threat to our islands’ sustainability.

Please consider adopting Alexandra Gayek’s Docket recommendations.
Please also consider adopting the Docket Request 21-0005 from Miles Becker.
Forest, shrublands, and grasslands are natural resources that slow stormwater and rainfall and allow our aquifers to recharge.

Please remove the Timber Harvest provision from the Shoreline Master Plan. The “fig leaf” justification for the “science” behind this provision is a Timber Harvest Plan for streamside buffers in Maine. The selective timber harvest in that plan was only allowed when the ground was frozen solid and covered by a thick layer of snow to protect the forest understory plants. How often do these conditions occur in San Juan County? Maybe if we enter a Little Ice Age (unlikely). And is frozen ground and a thick layer of snow required before timber harvest can occur along our shorelines? The answer is no.
No development in the Maine streamside buffers was allowed except for hiking trails. In San Juan County, entire houses, septic drain fields, gardens and orchards, and more, are allowed in the shoreline buffers.

Following the science and “considering” the science are completely different. The Growth Management Act only requires you to consider the science.

But wise and responsible leaders will follow the science and also address issues, such as affordable housing, water limitations, and people ignoring the existing regulations, that have been problems for some time. Ferry dysfunction cannot be ignored, either.

Please think like a civil engineer and reduce risks with sensible planning and regulations. Please build in resiliency to withstand not only existing and expected challenges, but unexpected as well. And above all, enforce the regulations with consistent and meaningful penalties that will deter our current islands’ culture of “I can do what I want and it will not matter to me personally or to these islands that I love.” When shoreline property owners have built more than 100 structures between the high and low tides over the last 10 years and only 14 of these structures were permitted, you know that something is seriously amiss.

Each violation adds to on-going ecosystem degradation and the loss of what I truly value in both our human and natural communities.

Janet Alderton
Orcas Island

Sophia Cassam

From: Eastsound Suites <info@eastsoundsuites.com>
Sent: Saturday, September 11, 2021 1:25 AM
To: Sophia Cassam
Cc: David Brazeau
Subject: Input re: Planning Commission recommendations on docket requests. YES! Develop a build-out analysis. We need one!

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.

- 21-0001, Commercial Composting on Agricultural Resource Lands.
  - **DISAGREE.** Recommend site-specific composting for commercial/industrial composting. We ask Council to preserve agricultural lands for farming and livestock.
- 21-0003, (Build-Out Analysis)
  - **DISAGREE.** This is critical work. Given the realities of RAPID development in SJ County and the climate crisis, a build-out analysis is needed to help guide the future of the San Juan Island. The rate of change on the islands has accelerated. Without data, and a framework for guiding growth, there is real framework to plan for the future.
- 21-0005, Creating New Tree-Protection Standards
  - **AGREE** with the Planning Commission's recommendation. We have owned a parcel in Olga for 20+ years. We are planning a modest 1400 sf single level (for aging in place) home. New setbacks now have placed our building site immediately adjacent to 3 heritage Douglas Firs (125+ yrs). To build our home, we would need to cut down this stand of magnificent trees, which are in themselves an ecosystem. We have asked to county for a variance to avoid destroying these trees; sadly there is no "value" assigned to heritage trees, so it will likely be an uphill fight to save them.

DISAGREE with de-designating 127 acres of Forest Resource Land.
SJ County's natural landscapes have important climate benefits. We ask the County to designate more land parcels as Natural Resource Lands. We recently learned that the Planning Commission decided to recommend de-designating 127 acres of Forest Resource Lands, opening those forested acres up to development. We ask that SJ Council vote to retain these 127 acres as Forest Resource Lands.

Thank you for your public service and stewardship of our beautiful islands and Salish Sea.

Leslie and David Brazeau

Eastsound Suites, Orcas Island
eastsoundsuites.com

360.376.2887

Sophia Cassam

From: Norris <norriscarlson@protonmail.com>
Sent: Sunday, September 12, 2021 8:52 PM
To: Sophia Cassam; Cindy Wolf
Subject: 2021 Docket Letter

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.

Dear Ms, Cassam,
As an Orcas Island resident, I am writing to express my thoughts regarding the 2021 docket.

Regarding 21-0001, Commercial Composting on Agricultural Resource Lands: I DISAGREE with the Planning Commission's recommendation. Industrial composting operations are not to scale or purpose with our highly protected and highly valuable Agricultural Resource Lands. Those parcels were set aside for agriculture for a reason. As the situation regarding climate change comes into dire and crisis driven focus over the next 10 to 20 years (as it inevitably will), all agricultural resources lands may very well be needed for just that--to keep our population from starvation (I know this sounds alarmist, but the science points in this direction). In any case, commercial composting is NOT compatible with agriculture operations. be found for this very important (but separate) activity.

Regarding 21-0003, "Build-Out Analysis": I DISAGREE with the Planning Commission's recommendation. I have already and previously expressed my firmly committed opinion that we absolutely MUST do a thorough and complete analysis of all of our resources in the face of rapid development in the county and the current climate crisis. It will be sorely too late to deal with issues such as lack of sufficient potable water, loss of wildlife habitat/corridors (and therefore species extinction), increased pollution pressure, once they have happened here. What contingencies, mitigations, strategies can we put into place without an analysis of where full capacity actually is for this island?. Without a buildout analysis that takes every possible angle of impact into account, the idea of creditable planning by the Commission, Council, or anyone else is an absurdity. We can no longer put this off. The proposals A and B are not comprehensive enough. I acknowledge the project is a heavy lift in terms of resources and effort. This should not deter us from what should be priority number one. Planning cannot be done responsibly without this complete analysis.

Regarding 21-0005, Creating New Tree-Protection Standards — I AGREE with the Planning Commission's recommendation.

Regarding 21-0008, Creating New Stormwater-Management Regulations — I AGREE with the Planning Commission's recommendation.

Regarding 21-0007, Drive-through eating establishments - I DISAGREE with the recommendation to allow this. We do not need more cars in Eastound, more driveways, more landscaping that looks like the mainland everywhere. COnsider the rural character of this place, please, in everything you do.

Thank you for your attention.
Sincerely,
Norris Carlson
117 Harrier Ridge Rd
Eastsound

Regarding
What's next?

Sent with ProtonMail Secure Email.

Sophia Cassam

From: John Clancy <jclancy1949@gmail.com>
Sent: Sunday, September 12, 2021 6:38 PM
To: Sophia Cassam
Subject: docket request 21-0003

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.

Dear Sophia,

Kindly forward this to the County Council. Thank you.

I stand in full support for Joe Symons' docket request 21-0003, which requests that the Planning Commission create a "Truth in Planning" component to the Comp Plan. This component would put in layperson's language the implications of our growth potential (e.g. the maximum buildout population) on our collective future. We would become clearly aware of this currently sanctioned buildout population on our county's carrying capacity, on its effects on our taxes and, extremely importantly, its effects on our desire to become a sustainable island culture.

Our species is devouring the world. And should intelligent and caring people like yourselves not make a significant and sustained effort to help the county populace become extremely aware of the impacts of our current trajectory, then we will continue to devour the world our corner of the world. I imagine that you are all under a great deal of pressure. I ask you, as I ask myself, to make a strong stand and operationalize the Vision Statement, holding that as the standard by which decisions are made. By accepting docket request 21-0003, by integrating its request into the CP, and thus making it easier for islanders to comprehend the effects of our growth, I believe you will experience a collective support for planning activity that embraces and manifests our Vision Statement.

Thank you.

John Clancy
161 Rosehip Rd.
Eastsound, WA 98245

Sophia Cassam

From: Michael Johnson <mdjishere@gmail.com>
Sent: Sunday, September 12, 2021 6:16 PM
To: Sophia Cassam
Cc: San Juan County Council
Subject: Docket Request 21-0003

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.

Thank you, Michael Johnson, Orcas Island

Sophia Cassam

From: Kate Kimball <katekimball@peak.org>
Sent: Sunday, September 12, 2021 5:04 PM
To: Sophia Cassam
Cc: San Juan County Council
Subject: Docket Request 21-0003

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.

Dear Council Members:

I urge the County Council to put Docket 21-0003 on the work plan for DCD as part of the process for completing the Comprehensive Plan update.

The staff recommendation is that you not adopt this docket item because (a) doing a full build out analysis would consume too much of limited staff resources and (2) the docket item has been mostly already addressed elsewhere. Without knowing anything substantive about the issue, I can tell there's a problem because these reasons conflict with one another. They cannot both be true. The only way I have found to reconcile these two objections is that a true build out analysis isn't being done and one is not planned. I understand that overworked staff might not be eager to take on another project, but that's not a substantive objection. None of the staff concerns address the merits of a build out analysis as a tool in planning.

Orcas is so much more crowded than it used to be and it's all the time, not just "tourist season." The village is already morphing into a town, the rural areas into suburbia. How much more crowded can we become? We need to see that final destination because we're already packed in the car for the road trip and the vehicle is picking up speed. I'm not going to feel very good when all the predictable things happen (traffic lights, no place for people who work here to live — oops, already happening — skies without stars, water restrictions, road widening, taller buildings) and then someone asks why we refused to see where we were heading. At some point, this analysis will have to be done. I'd rather not wait until we're out of drinking water to do it.

Docket 21-0003 is a reasonable and necessary way to find out what the world will look like if we do nothing. I urge you to support its adoption.

Thank you for your consideration of these comments.

Kate Kimball
Orcas Island

Sophia Cassam

From: Cindi Lund <cindilund56@gmail.com>
Sent: Sunday, September 12, 2021 3:38 PM
To: Sophia Cassam
Subject: Docket Request 21-0003

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 don't know much about this complicated situation, but I am concerned about our islands becoming overpopulated. We have owned property here on Lopez since the 1960's and we especially treasure the rural atmosphere, the forests, the quiet. I worry about adding more people because of the limited water supply, the loss of forests, the pressure on the failing ferry system. I think you must put population and building limits in place to protect these precious islands.

I urge the County Council to put Docket 21-0003 on the work plan for DCD as part of the process for completing the Comprehensive Plan update.

Thank you for your attention.

Cindi Lund

Sophia Cassam

From: ANN S PALMER <apalmer123@msn.com>
Sent: Sunday, September 12, 2021 9:21 PM
To: Sophia Cassam
Cc: San Juan County Council
Subject: Docket Request 21-0003

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 urge the County Council to put Docket 21-0003 on the work plan for DCD as part of the process for completing the Comprehensive Plan update.

I have read much of the material provided by Joe Symons. I know this is a complicated area, but it is essential that we as a county fully research and analyse the future of development in San Juan County, and to assure that the future population does not exceed the reasonable carrying capacity of the islands and at the same time to we need to preserve the quality of the environment and our lives in the islands. We are currently experiencing rapid growth and it is essential that we do the work now, before it is too late.

Respectively,

Ann Palmer
Lopez Island

Sent from my iPad

Sophia Cassam

From: Michael Riordan <mriordan137@gmail.com>
Sent: Sunday, September 12, 2021 12:10 PM
To: Council Public Comment
Cc: Sophia Cassam; joe symons; R. Brent Lyles; Janet Alderton
Subject: Support for Docket Request #21-0003

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.

Dear County Commissioners,

I write in strong support of Docket Request #21-0003 by Joe Symons and request that the Council add this docket to the Department of Community Development work load, to be accomplished before completion of the Comprehensive Plan now under revision.

To me, it is unimaginable that the County can achieve a credible comprehensive plan without the build-out analysis that Mr. Symons has been requesting for years, if not decades. It makes supreme sense that we have some sensible idea of the possible future population of San Juan County. The largest number I have heard mentioned, 134,000, is nothing short of laughable.

Given what happened this past summer with the tourist surge and problems with ferry service (in part due to the coronavirus), I estimate that the maximum population San Juan County can support is something like 30,000 to 35,000 — including part-time residents and visitors. That's at most twice our current year-round population. As I wrote in a comment to the *Orcasonian* article on this matter, we are ALREADY at our limit here, given current ferry service — which is highly unlikely to improve much over the next decade, according to Ken Burtness of Lopez, who has worked on the ferries for decades and currently serves on its citizens advisory board.

I also worry that our resident water supplies are insufficient to accommodate many more people than that. We are almost entirely dependent on rainfall, and on what can be absorbed on our lands or deliberately stored in aquifers. Eastsound Water Users Association (with which I am most familiar) has only about 100 more water hookups to serve the Eastsound UGA — a number that is regulated by the state Department of Health. The USGS is currently reviewing our likely water supplies, which has not been done for two decades. Until that analysis comes in, I cannot see how a credible build-out analysis (and Comprehensive Plan that depends on it) can be realized.

People speculate that water can be trucked in on the ferries, or that desalination can add substantially to our water supplies, but those are options only for the wealthy who can afford the costs. For example, I had to truck water for a winter in the early 2000s when the well at my rural Santa Cruz, CA, home ran dry, and it cost me 20 cents a gallon — not including the tanks, pump, and additional piping required. Figure at least 50 cents a gallon to truck it in on the ferries. And desalination is economically feasible only for a few wealthy waterfront enclaves, plus it will markedly increase the salinity of adjacent waters.

Nature, economics and external government agencies put severe limits on the population that can be reasonably accommodated here in San Juan County. We need to know what those limits are NOW, before proceeding much further with the Comprehensive plan.

Respectfully,

Michael Riordan

Orcas Island

--

Michael Riordan
Physicist/Author
106 Hilltop Lane
Eastsound, WA 98245

Sophia Cassam

From: annette drvandongen.com <annette@drvandongen.com>
Sent: Sunday, September 12, 2021 5:19 PM
To: Sophia Cassam
Cc: Cindy Wolf; Christine Minney; Jamie Stephens; jp drvandongen.com
Subject: Sept 14, 2021 hearing on the County Docket

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.

Dear County Councilmembers,

We respectfully ask you to consider our opinions on the following:

Build-out Analysis is critically important.
The Build-out Analysis should be part of the Comprehensive Plan's Introduction because all Elements of the Comprehensive Plan are included in the Build-out Analysis.
We need data on water, sewer, stormwater, garbage, land, road, ferry, airport, housing, education, medical, fire, etc. utilization in order to wisely plan for growth.

Tree Protection is important, not only for critical areas and shorelines, but everywhere in San Juan County when land is being developed. We support adding a new section to the Development Standards for Tree Protection throughout the county.

Respectfully yours,

John Pierre & Annette van Dongen
360-376-5708
PO Box 2074
Eastsound, WA 98245

Sophia Cassam

From: Patricia Ward <frnstone@rockisland.com>
Sent: Sunday, September 12, 2021 4:52 PM
To: San Juan County Council; Sophia Cassam
Subject: Support Docket Request 21-0003

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 urge the County Council to put Docket 21-0003 on the work plan for DCD as part of the process for completing the Comprehensive Plan update.

We have a housing crisis on Lopez island. People who have lived here for years can't get rentals. Businesses can't get help because there is no where for workers to live. Increasing population puts stress on the help that those of us living here need and have a hard time getting. How many people can our water table support? With the island identified as "the place" for the wealthy to move what about the survival of the rest of us…the people who keep the island running? Please look at our situation and help to find a solution that will keep the island viable for its existing residents.

Thank you,
Patty Ward
Resident since 1975

Sophia Cassam

From: annie crane <annieboonecrane@gmail.com>
Sent: Monday, September 13, 2021 9:43 AM
To: Sophia Cassam
Subject: Docket Request 21-0003

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 urge the County Council to put Docket 21-0003 on the work plan for DCD as part of the process for completing the Comprehensive Plan update.

Annie B. Crane

Sophia Cassam

From: Stewart and Denny McDougall <lopezshipwright@hotmail.com>
Sent: Monday, September 13, 2021 9:55 AM
To: Sophia Cassam
Subject: Docket Request 21-0003

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 urge the County Council to put Docket 21-0003 on the work plan for DCD as part of the process for completing the Comprehensive Plan update.

In light of our recent ferry problems, and the realization of drought conditions, how can we not put Docket 21-0003 on the work plan for DCD as part of the Comprehensive Plan?

Our islands have a finite amount of land, we need to look long range to protect this it.

Sincerely,
Denise and Stewart McDougall
Lopez Island

Sophia Cassam

From: Nora Ferm Nickum <nora.nickum@gmail.com>
Sent: Monday, September 13, 2021 11:28 AM
To: Sophia Cassam
Subject: Comments on 2021 Docket

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.

Thank you for the opportunity to comment on the 2021 Docket of proposed text amendments to the Comprehensive Plan and Unified Development Code (UDC).

21-0003 (Build-Out Analysis) - I disagree with the Planning Commission's recommendation. I instead support Alternative B - extending the planning period. This is important to allow the County to understand the implications of possible population growth on a longer timeline. It is also extremely important given the serious impacts that climate change will have on the islands, in the near term and beyond, and the efficacy of building resilience now.

21-0001 (Commercial Composting on Agricultural Resource Lands) - I disagree with the Planning Commission's recommendation. Industrial composting is not the same as smaller-scale, site-specific composting, which makes sense co-locate with farming and livestock. Industrial composting operations are needed in San Juan County, but should be placed on other available sites-- and I understand there are alternatives available--rather than on protected, valuable Agricultural Resource Lands.

I **agree** with the Planning Commission's recommendation on these items:

- **21-0005 (Creating New Tree-Protection Standards)**
- **21-0008 (Creating New Stormwater-Management Regulations)**

Sincerely,

Nora Nickum
655 MacGinitie Rd
San Juan Island

Sophia Cassam

From: julian at rockisland.com <julian@rockisland.com>
Sent: Monday, September 13, 2021 12:57 PM
To: Sophia Cassam
Cc: Christine Minney; julian@rockisland.com
Subject: Letter-County docket request 21-0003
Attachments: buildoutanalysis.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.

Hello Sophia,
Please forward the attached letter regarding docket request 21-0003 "Build-Out Analysis" to our County Council members.
Thank you,
Julie Greene

cc Christine Minney

TO San Juan County Council
FROM Julie Greene and Ian Walt
DATE September 10, 2021
RE 21-0003 BUILD-OUT ANALYSIS

We ask that the County Council provide a full build-out analysis prior to considering expansion of the UGA for community development. The Planning Commission and the community deserve to have adequate and accurate information before making further recommendations to the Council.

Well-founded facts supporting a need for UGA expansion should be produced and analyzed before carefully considering whether to open the door to irreversible development and urban sprawl that will affect our shared environment, open spaces, and rural island lifestyle. Limited resources, limited ferry capacity, climate change, and the expense of creating urban utility infrastructure should make population growth a critical discussion for all of us. But first we need sufficient data.

In their recent review of four Town applications to bring County properties into the UGA for future annexation into the Town, County Planning Commissioners questioned the "cart before the horse" approach the staff had presented to them. Specifically, the Town had not provided required population data to support their request. We appreciate that, based on this, the commissioners withheld further review of two of the requests until proper documentation is provided. However, County staff said they would keep all four requests on their schedule for planned open house discussions—making it clear they believe the Town will come up with the necessary figures. This may be true, but the assumption is worrying as it gives the unintended appearance of a rush toward development. A build-out analysis should be required to confirm the need for this level of development.

Thank you for the hard work you do for our county. Your position as council members is certainly not easy.

Best regards,

Julie Greene and Ian Walt
San Juan Island
julian@rockisland.com
(360) 378-3638