

Adam Zack

From: Adam Zack
Sent: Friday, October 11, 2019 3:59 PM
To: 'joe symons'
Cc: Lynnette Wood; Erika Shook; Timothy P. Blanchard; Georgette Wong
Subject: RE: Request for LCA / GDLI calculations

Hi Joe,

A video recording of the County Council briefing on the Land Capacity Analysis on September 16, 2019, is available on the County website here: <https://www.sanjuanco.com/903/Council-Agendas-and-Video>

You may also be interested in the Planning Commission briefing on the Land Capacity Analysis recorded on September 20, 2019. The video is posted here: <https://www.sanjuanco.com/971/Planning-Commission-Meeting-Video>

These recordings should answer your questions about either briefing.

A fair characterization of the difference between your attempt to conduct an analysis and the Land Capacity Analysis is that you do not seem to be using the same data set and it is possible that you may not be correctly applying the Land Capacity Analysis Methodology. I do not know your process nor what software you are using and so, cannot speak to what kind of analysis you're conducting. I will not comment further on an attempted analysis conducted independently of the Land Capacity Analysis process.

Please let me know if you have any additional questions about the Land Capacity Analysis.

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360-370-7580
adamz@sanjuanco.com

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From: joe symons <joesymons@me.com>
Sent: Wednesday, October 9, 2019 12:22 PM
To: Adam Zack <adamz@sanjuanco.com>
Cc: Lynnette Wood <lnmiwood@gmail.com>; Erika Shook <erikas@sanjuanco.com>; Timothy P. Blanchard <tim@blanchardmanning.com>; Georgette Wong <georgette_wong@yahoo.com>
Subject: Re: Request for LCA / GDLI calculations

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thanks for your prompt reply.

Yes, I believe, based on your info here, that we are using different “versions” of the same data set. I’m using the simple, basic, GDLI-esque data set, which I interpret to be the legal foundation for development. DCD appears to be using a sub-set of this, based on LCA assumptions which reduce “buildout” by public, market and vacant-use factors. The “legal” vesting of du’s appears to be ignored. As I recall, Rick Hughes asked you about this during a recent hearing where you testified re the LCA progress.

Would this be a fair characterization of the difference between the results we have?

Thank you for your recommendations re comments on the LCA.

Joe

On Oct 9, 2019, at 11:49 AM, Adam Zack <adamz@sanjuanco.com> wrote:

Hi Joe,

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

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

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

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

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

Thanks,
Adam Zack

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

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

I am focussing only on rural areas.

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

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

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

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

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

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

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

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

From a big picture perspective, I believe the fundamental LCA methodology may be appropriate for activity centers given the FAR considerations, tho even there much massaging is likely. That said, I think the methodolgy does not appear to consider legal maximums. DCD may be using “best practices” among national planning standards in its LCA methodology but in reality at buildout there will be no market factor and absolutely no discount for vacation/partial use/recreational du’s. If a parcel has a du, at buildout it will be used, or in all cases it is legally available to be used (i.e., developed). State and County regs require certain water and other resources be met AS IF a du were occupied full time. Common sense reveals that “recreational use” structures are basically fully occupied in peak season months. Discounting these structures as if they didn’t exist distorts the infrastructure requirements that the county is obligated to supply, and thus the costs to be incurred. Further, none of these calculations speaks to the impact on the community, on the vision statement, on carrying capacity topics.

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

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

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

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

Joe Symons

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

Hi Joe,

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

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

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

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

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

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

For example:

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

<image001.png>

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

<image002.png>

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

Capacity = (4.2435) – 1

Capacity = 3.24

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

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

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

Thanks,

Adam Zack

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From: joe symons <joesymons@me.com>

Sent: Thursday, October 3, 2019 5:31 PM

To: Adam Zack <adamz@sanjuanco.com>; Erika Shook <erikas@sanjuanco.com>

Cc: Lynnette Wood <lnmiwood@gmail.com>; Timothy P. Blanchard <tim@blanchardmanning.com>; Georgette Wong <georgette_wong@yahoo.com>

Subject: Request for LCA / GDLI calculations

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

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

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

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

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

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

Your assistance most welcome.

Thanks

Joe Symons

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carpe diem

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