

## Sophia Cassam

---

**From:** Lynda Guernsey  
**Sent:** Friday, April 1, 2022 12:50 PM  
**To:** Comp Plan Update  
**Subject:** FW: Public Comments for April 1 special meeting of the Planning Commission

Lynda Guernsey, Administrative Specialist II – Direct Line (360) 370-7579  
**SAN JUAN COUNTY**  
DEPARTMENT OF COMMUNITY DEVELOPMENT  
(360) 378-2354 | 135 Rhone Street | PO Box 947 | Friday Harbor, WA 98250

---

**From:** Bill Bangs <wjbangs@gmail.com>  
**Sent:** Thursday, March 31, 2022 11:16 PM  
**To:** Lynda Guernsey <LyndaG@sanjuanco.com>  
**Subject:** Public Comments for April 1 special meeting of the Planning Commission

You don't often get email from [wjbangs@gmail.com](mailto:wjbangs@gmail.com). [Learn why this is important](#)

**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 think I can read these in 3 minutes. If not, just cut me off. Thanks.

Good morning, commissioners. I'm Bill Bangs from Orcas Island.

I have a couple comments regarding the recent draft of our Comprehensive Plan, Appendix 1 on Population Projections and Land Capacity Analysis

Section 1. Page 6 states the requirement that our population forecast be consistent with the OFM projection for 2036. By resolution, and convoluted analysis, we selected 19,423 as the projected resident population of SJC in 2036. The document never actually says that we are consistent with the 2017 OFM projections for 2036 of Low (15,277) Medium (18,872), and High (24,797). We should proudly state that we are within 3% of the OFM's best guess (and fully compliant with the GMA)! (As a matter of interest, the 2017 OFM projections showed 16,510 as the 2017 population.)

Section 1, Page 10 claims that SJC peak season daily population is estimated to be 24,604. It is not clear what year this is supposed to represent, I assume sometime between 2017 and 2020. The estimate is, apparently, the sum of the (estimated) resident population and the estimate of daily visitors taken from the 2018 Visitor's Study ("For 2012-2016, the average peak season daily visitor population in San Juan County is estimated to be 8,291 people based on ferry ridership and average stay length.") In 2020, the census said we had 17,877 residents but the quoted daily visitor rate neglects the Seasonal, Recreational, and Occasional home occupants. There were more than 6,000 such home in 2020

and, assuming 2 occupants per home, that is another 12,000 folks on the island during peak season. **I think the number should be closer to 38,000.**

Section 2. Kudos to the County for applying the LCA to the entire County and not just the UGAs. However, I believe that the LCA Methodology (Attachment A) is seriously flawed and inconsistent with Department of Commerce guidance. The methodology fails to account for achieved development trends by using only the maximum densities indicated in the official maps. The predicted (assumed) densities should be much closer to the historical achieved densities. The methodology also incorrectly adjusts for the SRO housing component. Along with the projected population growth of 2,913, the County (by another resolution) adopted a projected housing unit growth of 4,180 (from 2016 to 2036). With an average of 2.04 people per housing unit, the resident population growth implies a need for 1,428 units for the residents. That leaves  $4,180 - 1,428 = 2,752$  housing units needed for SRO owners – nearly twice as many as projected for full-time residents. The methodology does not fully account for this SRO need. As a result, **the LCA grossly overstates the housing capacity of the county (and of the Eastsound UGA , in particular).**