

**PLANNING COMMISSION
REGULAR MEETING
April 27, 2010**

ROLL CALL: **Present:** Bruce Neil, Julie Dale, Keith Fakkema, Kristi Jensen, Nancy Fey and Greg Wasinger.
 Absent: Mark Wiggins.
 Staff Present: Senior Planners, Ethan Spoo and Cac Kamak and Associate Planner, Melissa Sartorius.

Vice Chairman Neil called the meeting to order at 7:35 p.m.

MINUTES: MS. JENSEN MOVED, MS. DALE SECONDED, MOTION CARRIED TO APPROVE THE MARCH 23, 2010 MINUTES AS PRESENTED.

PUBLIC COMMENT

Marianne Edain (Whidbey Environmental Action Network) asked what the current water availability and restrictions are regarding the Skagit River. Mr. Powers stated that the contract for obtaining water through the City of Anacortes to provide adequate water supply runs for 20 years and the City is not experiencing any conservations efforts at this time. Staff will look further into this issue and report back to the Planning Commission.

URBAN GROWTH AREA (UGA) CAPACITY ANALYSIS – Public Meeting (no action required)
Staff provided initial findings and data related to land use percentages in the City of Oak Harbor and in the surrounding UGA.

Mr. Kamak reported that on March 2, 2010 the City Council approved the 2010 Comprehensive Plan Amendment Docket which includes performing a capacity analysis for the current Urban Growth Area (UGA). The scope of this year's analysis is to determine capacity and will not include any recommendations or proposals to change the UGA.

As part of the UGA capacity analysis, staff has gathered population, permits, and land use distribution data. The discussion will also include a methodology to determine potentially developable land in the UGA.

The graphs, charts, maps etc. are generated from data obtained from the State Office of Financial Management (OFM), Island County Assessors Office and the City of Oak Harbor Development Services Department. Some of this information may not directly reflect the real conditions of the property and will therefore need to be identified and amended as the analysis progresses.

This meeting is intended to share data that staff has gathered with the Planning Commission. No actions or recommendations are requested.

Mr. Kamak displayed a Power Point presentation attached to these minutes as Attachment 1.

Mr. Kamak reported that the data presentation includes the following information:

- Population – Historical trends and 20 year projection
- Building Permits – Development – Residential/ Commercial
- Existing Land Use Distribution
- Methodology in determining land available for development
- Maps based on Development Ratios

The population data shows that it is very hard to predict population trends. Historically, population growth as a percentage is:

- 67% in unincorporated Island County
- 33% incorporated (Langley 5%, Coupeville 7% and Oak Harbor 88%)
- 29% City of Oak Harbor.

Population projections from the OFM are shown below. The decision as to whether to plan for the low, medium or high population projection is left up to the Cities and Counties. In 2005 Island County and the City of Oak Harbor agreed to choose somewhere between medium and high.

20 yr Population Projection

	2010 Population	2030 Population	Difference
ISLAND COUNTY			
Low	73,036	85,164	12,128
Medium	80,703	107,126	26,423
High	88,370	129,088	40,718
Medium - High	84,537	118,107	33,571
OAK HARBOR			
Low	21,180	24,698	3,517
Medium	23,404	31,067	7,663
High	25,672	37,436	11,808
Medium-High	24,516	34,251	9,735

28.9%

Mr. Kamak noted the building permit data from the City of Oak Harbor from 1973 – 2009 doesn't follow any kind of trend.

UGA land use distribution is between three areas:

- City – 45%
- Seaplane Base (not incorporated into the analysis because the City doesn't assign land uses in the Seaplane Base) – 38%
- Unincorporated UGA – 17%

Land use distribution within the City limits and in the unincorporated UGA is mostly low density residential.

Mr. Kamak explained Developable vs. Undevelopable Methodology as follows:

- Determine/agree on population to accommodate (projections)
- Determine area within the City and the UGA
- Determine undevelopable properties
 - ROW
 - Schools
 - Public Facilities
 - Parks and Open Spaces
 - Utilities, detention basins, buffers, tracts etc.
 - State and County owned properties
 - Not for profit organizations
 - Religious institutions
 - Well sites
 - Etc.
- Determine properties that have a potential for development and redevelopment
- Determine the amount of land available in each land use category
- Determine development capacity for each land use based on Comprehensive Plan densities and historical trends or other assumptions
- Determine if it can accommodate the 20 year population projection

Mr. Kamak indicated that determining developable and undevelopable properties is an evolving science and numerous variables and market forces cannot be accurately predicted. Ordinances also provide various degrees of flexibility. Community character also plays a role.

Mr. Kamak explained that the criteria for the methodology to determine developability should encompass the following:

- Simple and logical
- Relies on data that is available
- Data can be obtained readily
- Can be repeated in the future for comparison
- Can be tracked over time

Mr. Kamak explained some of the methodologies as follows:

- ILR – Improvement value to Land Value Ratio
 - Based on assessed values
 - Uses a ratio between the land and the structure
 - Does not take into account any other feature of the property
- Density Ratio
 - Not based on assessed values
 - Uses a ratio between existing density and potential density
 - Requires creating a database of information not currently tracked
- Developability Ratio
 - Based on assessed values
 - Compares either the structure value or the land value against the total assessed value
 - Focuses on one aspect of the value

Mr. Kamak noted that since Oak Harbor isn't a high density area it makes more sense to compare land values in terms of redevelopment so the Development Ratio method appears to fit the best for now. Examples are shown below:

Using Developability Ratio

- Data available from the County and updated regularly
- Total Assessed Value to Land Value Ratio
 - Example 1
 - Total Assessed Value is \$400,000
 - Land Value is \$300,000
 - Structure and special features is \$100,000
 - Land Developability ratio = $\$300,000/\$400,000 = 75\%$
 - Example 2
 - Total Assessed Value is \$300,000
 - Land Value is \$100,000
 - Developability ratio = 33%

Assumptions are:

- Higher numbers indicate a higher probability of development
- Assumes that if the land value is a significant portion of the total assessed value then it has a potential for redevelopment
- If the Developability Ratio is 100% the assumption is that there are no structures or development on the property

Mr. Kamak indicated that it's a community choice on where to draw the line for developability. This will be the discussion over the couple of months. One of the complications is whether a property will develop within the 20 year period.

- For Example
- Choosing to consider properties that have a developability ratio of 50% or less will include more properties many of which may be unrealistic for redevelopment
- Choosing to consider properties that have a developability ratio of 90% will reduce the number of properties and may not include potentially redevelopable properties

Mr. Kamak displayed maps generated using the assessed values obtained from the Island County Assessors office. The maps give an idea of what the 50%, 60%, 70%, 80% and 90% developability ratios show. The maps are attached to these minutes as Attachment 3. The greener the color is the higher the developability ratio and the brown areas indicate the lower percentage of developability.

Mr. Kamak reiterated that the development ratios are not a goal that we are trying to achieve but are tools to try and determine realistically what properties may develop within the next 20 years using existing data.

Planning Commission Discussion

Ms. Jensen pointed out that the assessments don't reflect rents received. Sometimes the assessment shows a low building value due to age and depreciation yet there is high value due to rents. This land may show as developable using the developability ratio but it is not worth it to the owner to tearing down the building and rebuild because rents received are high.

Mr. Kamak indicated that this is the type of real world knowledge that will need to be worked through and applied throughout this process.

Ms. Fey added that historical value of structures will also need to be taken into account.

Mr. Fakkema asked about the advantage to a city in keeping development confined to the city instead of spreading out its borders. Mr. Kamak said that urban development needs to be where services can be provided. It is better to provide development opportunities where you already have water and sewer available.

Mr. Neil opened the meeting for public comment.

Al Lentz (1875 Ft. Nugent Road) expressed concern about the City's ecological impact on the rural areas and how this information may be used to spread the UGA. Mr. Lentz also stated that he didn't hear anything about public input in the presentation. Mr. Powers stated that this meeting is the beginning stage of presenting materials to the Commission and also the beginning of the public input process. These discussions will continue into May and June and there will be opportunity for public input during those discussions as well.

GayLynn Beighton (2507 West Beach Road) provided a copy of her career resume and read prepared comments and underlined portions of Western Washington Growth Management Hearings Board Final Decision and Order, Case Number 08-2-0007c August 15, 2008 attached to these minutes as Attachment 2.

Steve Erickson (Whidbey Environmental Action Network, PO Box 53, Langley, WA 98260) commented that there is a problem with looking at historical trends and continuing them into the future. Oak Harbor is becoming less dense and this has been a trend for close to 20 years therefore thwarting the basic premise of the GMA.

Mr. Erickson stated that he didn't have a preference as to the method used. The problem he has is that they are meant to be used as a predictive tool but they haven't been validated. Mr. Erickson suggested that staff take the three methodologies and take a sample of properties in the various classes that have and haven't been developed over time and do a post-hoc analysis (looking back in time) to see if the methods explain what has happened.

Mr. Erickson had the following questions:

- 1) What was date of OFM forecast that was used?
- 2) Is chart on page 14 a percent of change in population in unincorporated areas versus Oak Harbor looking at the relative change in population distribution between the unincorporated areas and Oak Harbor?
- 3) Pages 15 & 16 historical population growth percentages; he doesn't really understand what that is showing unless that is just another way of showing the distribution whether in a given year what percentage of the population growth was in the City and what percentage was outside the urban areas.
- 4) Building permit on page 21 does this show only building permits in that year?
- 5) Page 22 dwelling units to population 1973-2009 does that just show building permits or dwelling units in a given year?
- 6) Are the units of measure acres for the charts on page 24, 25 and 26?

Marianne Edain (Whidbey Environmental Action Network) clarified her earlier question about water availability to the City from the Skagit River. She noted the February press release from the City announced that there was a problem with water due to the low snow pack. She pointed out that water is one of the basic necessities of life and that perhaps Oak Harbor needs to look at its intended future population projections to see if it can sustain a medium or high population projection. She commented that she was a little disturbed by the term “or other assumptions” used on page 31, second to the last bullet point. She wanted to know what those other assumptions are. Everything needs to be spelled out clearly.

Ms. Edain pointed out the statement from staff that the Planning staff plans to rely on existing data and not generate new data. She believed that was a serious problem.

Ms. Edain also asked about what the provisions are for accessory dwelling units on fairly large parcels in the City and how often are those provisions used and how many accessory dwellings can we expect on larger lots which would increase density without requiring further subdivision. She thought the City needs to focus on existing densities and how those densities are going to be increased in the City limits.

Scott Ashworth (2438 Juan De Fuca Road) stated that he was part of the Swan Lake Preservation group and he and his family own 76 acres around Swan Lake so they have a strong interest in keeping that area in its natural state and to preserve farmland. He thought that if the City were to decide not to grow at this time that property values within the City limits would be more valuable and if he were an Oak Harbor land holder and resident he would be pleased with that kind of decision.

Jerry Pitsch (2527 West Beach Road) stated that Swan Lake is in his front yard and Juan De Fuca is in his back yard. He asked if the Planned Industrial Park and Planned Business Park listed in the table on page 29 showed the number of parcels. Mr. Powers indicated the number referred to the number of parcels. Mr. Pitt stated that he had done some research and found that between 2004 and 2007 there were 18 contractors that build 42 assisted living units, an 80 room hotel, 46 condo units, 29 unit apartments, 530 single-family lots with homes and 344 single-family units. From 2000 to 2010 the population of Oak Harbor only increased 385. He surmised that there must be many of empty units. He had doubts about the City’s population projection from 2010 to 2030 of 24, 006 which is a difference of 3,500, a 10-fold increase. He believed that the population projection is lower than the low population projection on page 18.

Jerry Homola (2362 Happy Lane) asked if the Planned Industrial area was included in the current UGA expansion area on Goldie Road or is it within the current UGA? Mr. Powers stated that the analysis that staff will be presenting this year is only focused inside the original UGA adopted by the City and the County in 1995. The City is not looking at the proposed expansion that the City put forth to the County in 2005 since that has not officially been acted upon. The analysis is only inside of what might be referred to as the original UGA.

Mr. Homola asked if the Seaplane Base is included in the UGA acreage and population.

Mr. Homola noted that the 2010 census is taking place and in 2012 there will be current population numbers. Mr. Homola believed that the City is using outdated numbers.

Mr. Homola asked if the Planning Commission had read the 2005 UGA expansion proposal and the follow-on appeals. He stated that those materials should be reviewed as we move into the next stage.

Mr. Homola encouraged everyone to read as much as they can about community. He challenged anyone to find where urban sprawl is good for community. Mr. Homola also noted that there is a great opportunity to focus on mixed use land development which will improve the community. He believed that the City's recent decision to make Pioneer Way one-way was a move in the right direction to improve downtown.

Mr. Powers thanked the community members in attendance for their time spent on reviewing the information for the feedback they provided.

Mr. Powers and Mr. Kamak summarized some of the questions that were asked and provided the following responses to the questions:

- Pollution and ecological values – This is part of the decision making process that will come in succeeding years as we talk about what this information tells us and should we then talk about a change in the UGA or not, and if that is the direction the community goes, where should those changes take place and how does the ecological value come into that particular area.
- Mr. Erickson's questions:
 - Charts on pages 21 and 22 reflect the actual number of units per building permits for the year.
 - Population numbers – These numbers are obtained from the OFM which is updated by April 1st of every year and the data is provided by June of every year. We are using the data that was provided in 2009. The federal census of 2000 adjusted the 1998/1999 projections and we expect that the projections will change when the 2010 census data becomes available in a couple of years.
- Ms. Edain's question:
 - Water conservation issues – We are not currently under a request for conservation measures from the City of Anacortes. Staff appreciates focusing on resources those are truly important.
 - Accessory Dwelling Unit provisions – The City has provisions for accessory dwelling units unfortunately there have only been one or two individuals take advantage of those provisions. It is an area that staff would like to see used more. As part of the subdivision code update the City made it easier for short plats and infill development to occur by lessening some of the public infrastructure requirements, namely streets, to allow lots to be on either private drives or private access ways.
 - New data versus old data or creating new data sources – This is a staff resource issue for the City. We appreciate that input about what the right format for us to accomplish this project but on the other hand we have the obligation to balance our ability to tackle a certain sized project.
- Mr. Pitschs' question about Planned Industrial Park parcels - There are 11 Planned Industrial Park parcels and 3 Planned Business Park parcels for a total of 78 acres.

- Mr. Homola's questions:
 - Seaplane Base – the Seaplane base is in the city limits and within the UGA. A portion of that is included in the OFM projections. The number comes from Navy Housing to the OFM which becomes the estimate that is provided to the City. The City is also working with the Navy to get information on the population that resides on base and staff will make some adjustments as we go through the process to try and see what Oak Harbor should plan for not including the Navy population. If we are to subtract the number residing on base from the number that we get from OFM we need to be sure that OFM's number included the Navy's number in the first place.
 - 2010 Census and when that information becomes available and how does that tie into this particular project – In a perfect world all the timelines would line up better but the City has the Comprehensive Plan that directs that the City look at the capacity of our urban growth area once every five years which means looking at all land use categories and not just residential land uses. Hopefully the 2010 census information is available in late 2011 early 2012 which will line up with the State's GMA mandate for a major review and update in 2012.
 - Comments about cultural shifts and changes in economies and communities – These are things that we will be looking to the community, Planning Commission and Council for guidance on. That is more of the art of this and as one speaker cautioned on not only relying on the science so much but bring in the human side to the discussion which is part of the community values that we are looking for.

Mr. Kamak elaborated on the public input process stating that there is a blog site for the Comprehensive Plan amendments and the advertisements are posted on the link and the public can post comments to the blog site as well. There will also be public input opportunities in August and September during open houses or Planning Commission meetings. All Planning Commission meetings are open to the public. Mr. Kamak noted that this is the first phase and there will be a couple of more years of work in terms of defining numbers and figuring out what they mean and what kind of policy changes need to be made to reflect the direction the community wants to go.

LOW IMPACT DEVELOPMENT (LID) CODE UPDATE PROJECT– Public Meeting
(no action required)

Planning Commission decided to shift the LID discussion to next month.

BEING NO FURTHER BUSINESS BEFORE THE PLANNING COMMISSION, THE MEETING WAS ADJOURNED AT 9:30 P.M.

UGA Capacity Analysis

Data Collection and findings

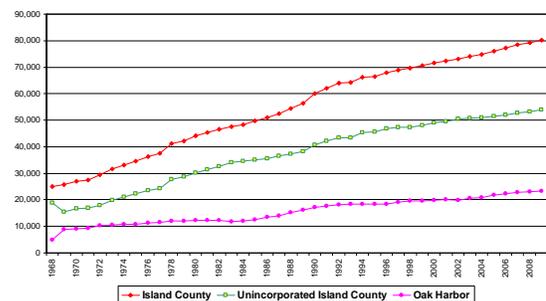
April 27, 2010 discussion

- Population – Historical trends and 20 year projection
- Building Permits – Development – Residential/ Commercial
- Existing Land Use Distribution
- Methodology in determining land available for development
- Maps based on Development Ratios

Population

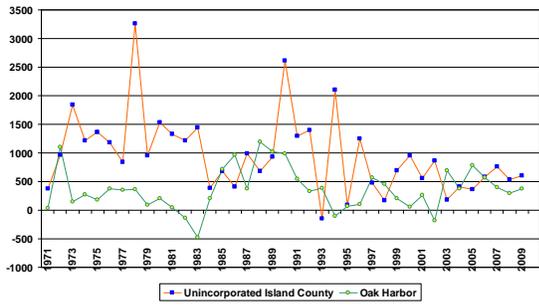
Projections and Historical Trends

Historical Population Trend



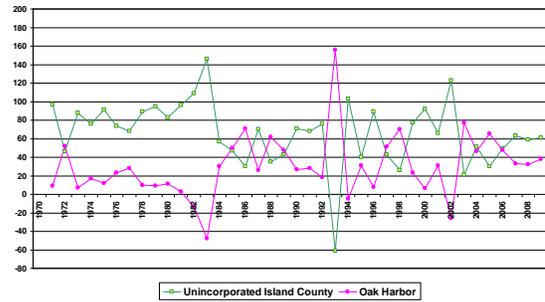
Historical Population Growth

Annual increase in population



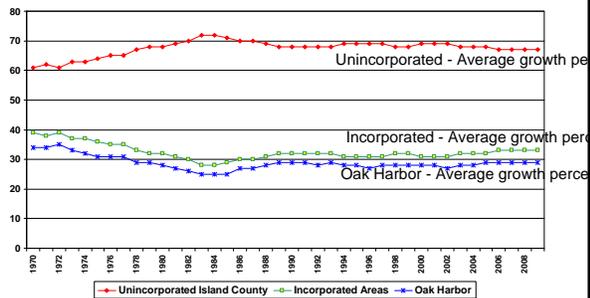
Data Source: Washington State Office of Financial Management

% Annual change in Population Unincorporated areas vs. Oak Harbor



Data Source: Washington State Office of Financial Management

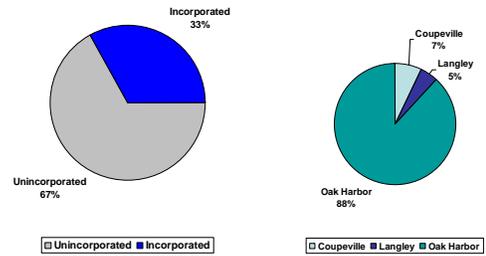
Historical Population Growth Percentages



Data Source: Washington State Office of Financial Management

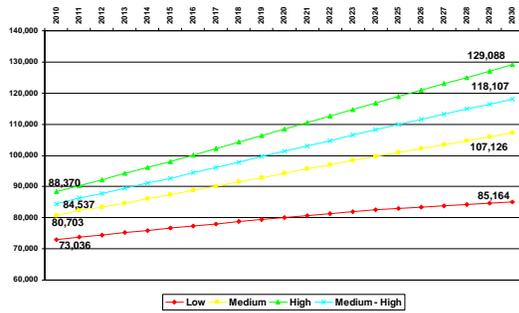
Population Growth Percentages

For County and Cities (Average based on historical trends)



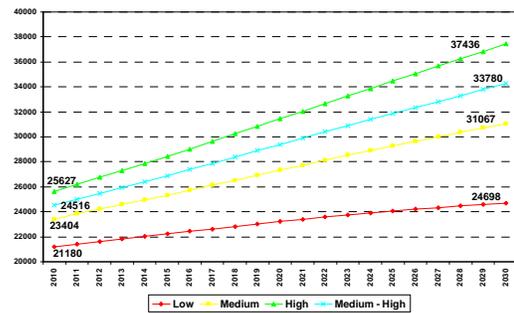
Data Source: Washington State Office of Financial Management

Island County Population Projections



Data Source: Washington State Office of Financial Management

Oak Harbor Population Projections



Data Source: Washington State Office of Financial Management

20 yr Population Projection

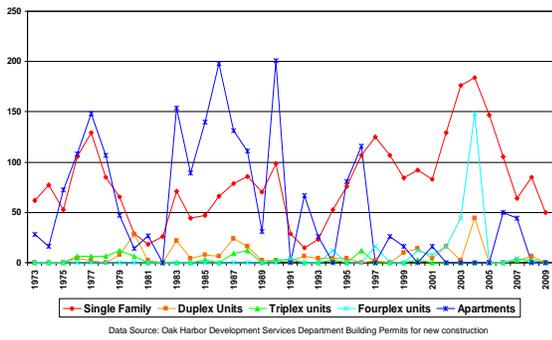
	2010 Population	2030 Population	Difference
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Low	73,036	85,164	12,128
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Medium	23,404	31,067	7,663
High	25,627	37,436	11,808
Medium-High	24,516	34,251	9,735

Data Source: Washington State Office of Financial Management
Medium-High was calculated as an average between the High and Medium population

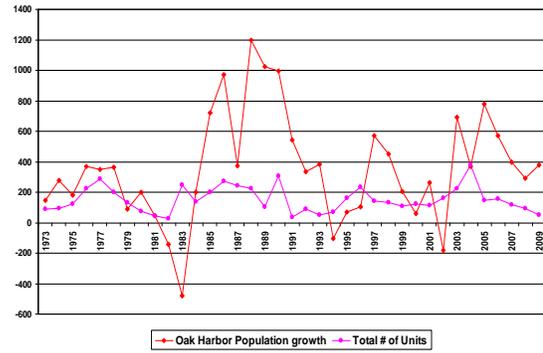
Building Permits

Development Trends, Housing,
Building Permits etc.

Dwelling Units 1973-2009 Oak Harbor



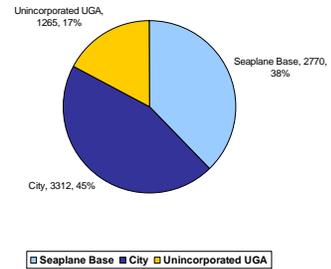
Dwelling Units to Population 1973-2009



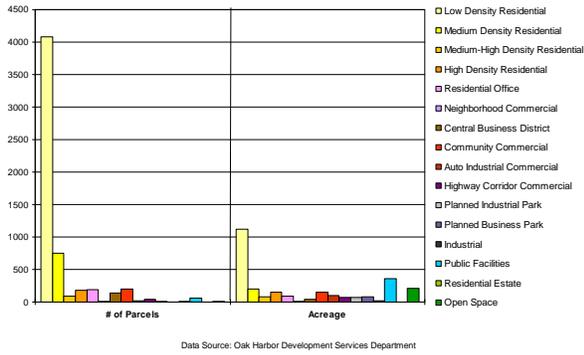
Land Use Distribution

Percentage of land use categories within City limits and unincorporated UGA

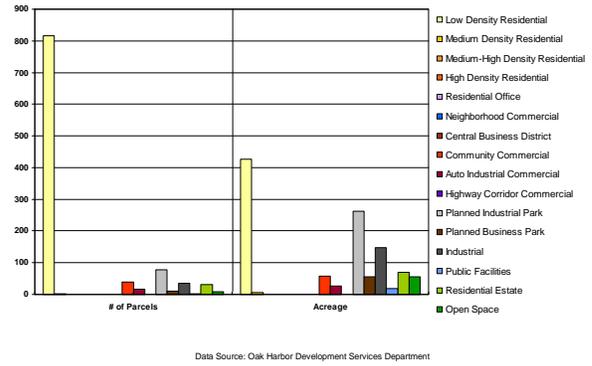
City and UGA Areas



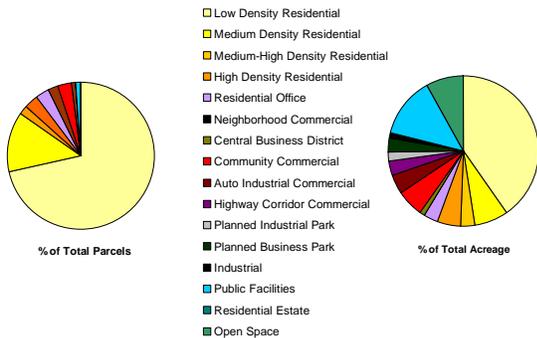
Land Use Distribution – City Limits



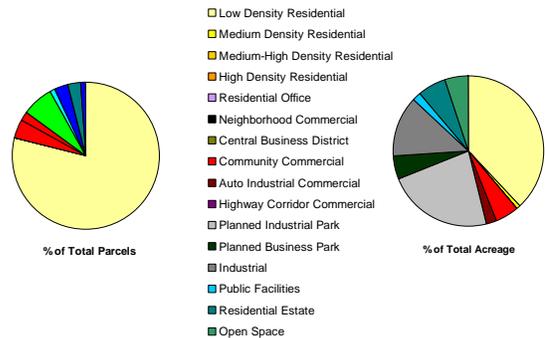
Land Use Distribution – Unincorporated UGA



Land Use Distribution in City Limits Percentage parcels vs. acreage



Land Use Distribution in unincorporated UGA Percentage parcels vs. acreage



Land Use Distribution in City Limits and Unincorporated UGA

Land Use Category	City Limits				UNINCORPORATED UGA			
	# of Parcels	Acreage	% of Total Parcels	% of Total Acreage	# of Parcels	Acreage	% of Total Parcels	% of Total Acreage
Low Density Residential	4084	1116	70	40	815	427	79	38
Medium Density Residential	752	201	13	7	3	6	0	1
Medium-High Density Residential	89	84	2	3	0	0	0	0
High Density Residential	180	150	3	5	0	0	0	0
Residential Office	187	94	3	3	0	0	0	0
Neighborhood Commercial	12	7	0	0	0	0	0	0
Central Business District	144	41	2	1	0	0	0	0
Community Commercial	203	154	3	6	38	58	4	5
Auto Industrial Commercial	25	105	0	4	17	26	2	2
Highway Corridor Commercial	45	75	1	3	0	0	0	0
Planned Industrial Park	11	67	0	2	77	263	7	23
Planned Business Park	3	78	0	3	10	55	1	5
Industrial	10	20	0	1	34	148	3	13
Public Facilities	61	358	1	13	3	18	0	2
Residential Estate	0	0	0	0	31	70	3	6
Open Space	12	214	0	8	9	56	1	5
TOTALS	5818	2764	100	100	1037	1127	100	100

Data Source: Oak Harbor Development Services Department

Developable vs. Undevelopable

Methodology, data source, GIS queries etc.

Methodology

- Determine/agree on population to accommodate (projections)
- Determine area within the City and the UGA
- Determine undevelopable properties
 - ROW
 - Schools
 - Public Facilities
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 - State and County owned properties
 - Not for profit organizations
 - Religious institutions
 - Well sites
 - Etc.
- Determine properties that have a potential for development and redevelopment*
- Determine the amount of land available in each land use category
- Determine development capacity for each land use based on Comprehensive Plan densities and historical trends or other assumptions
- Determine if it can accommodate the 20 year population projection

Determining Developable and Undevelopable Properties

- A evolving science
- Numerous variables
- Market forces cannot be accurately predicted
- Ordinances providing various degrees of flexibility
- Proposed development vs. development potential
- Community character

Criteria for the Methodology to determine Developability

- Simple and logical
- Relies on data that is available
- Data can be obtained readily
- Can be repeated in the future for comparison
- Can be tracked over time

Some Methodologies

- ILR – Improvement value to Land Value Ratio
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Using Developability Ratio

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- Higher numbers indicate a higher probability of development
- Assumes that if the land value is a significant portion of the total assessed value then it has a potential for redevelopment
- If the Developability Ratio is 100% the assumption is that there are no structures or development on the property

Drawing the Development Line

- Capacity is based on determining the amount of land available for development
- 20 year period (RCW 36.70A.110 (2))
- It's a community choice on where to draw the line for Developability
 - For Example
 - Choosing to consider properties that have a developability ratio of 50% or less will include more properties many of which may be unrealistic for redevelopment
 - Choosing to consider properties that have a developability ratio of 90% will reduce the number of properties and may not include potentially redevelopable properties

Maps

- Maps generated using the assessed values obtained from the Island County Assessors office
 - City and unincorporated UGA – range of Developability ratio
 - 50% + Developability Ratio
 - 60% + Developability Ratio
 - 70% + Developability Ratio
 - 80% + Developability Ratio
 - 90% + Developability Ratio

Next Meeting

- Developable and undevelopable property by Land Use category in each of the Developability Ratios within the City and the unincorporated UGA

Chiles & Company, Inc.
The Lake Union Building
1700 Westlake Avenue N., 100
Seattle, WA 98109-8212
www.chilesandco.com

T: 425.742.7953 (Edmonds)
F: 425.742.3883 (Edmonds)
T: 206-216-4191 (Seattle)
E: gbelghton@chilesandco.com
www.ccim.com/about/ccim.html

GayLynn Belghton, CCIM

Objective

To give an overview of past experience, education, professional affiliations and business references.

Experience

1995 – 2007 Chiles & Company, Inc. Seattle, WA

- Multi-million dollars in development land sales and commercial leases annually based in Snohomish County WA through 2006.
- Awarded Washington State CCIM Chapter 2000 Broker of the Year Award for assisted living residential development land sale.
- Washington State CCIM Chapter President 2003.
- Expert witness 2005: Harbor Square versus Unocal and Port of Edmonds.
- Chiles & Co. consulting team member for Seattle Housing Authority.
- Inactive in brokerage as of 2007: actively licensed in Washington State: Associate Real Estate Broker with Chiles & Company, Inc.

1987-1994 Prudential Preferred Properties Everett, WA

- Awarded Top PPP Investment Land Associate in 1992.
- Awarded top CBA Listing Agent in Puget Sound in 1991

1986-1987 Wallace & Wheeler Commercial Bellevue, WA

- First transaction – land sale for development of a Kirkland office building closed in 1987.

Education

1987-1992 CCIM Institute

Chicago, IL

Graduated CCIM Designee in 1992.

Interests

CCIM Designee (1992-2005); Director on the CBA Board of Directors 1995-2008; Past Director for the Edmonds Alliance for Economic Development; Past Director on the Edmonds Chamber of Commerce Board of Directors; Past Chair of the Economic Development Committee for Edmonds Chamber of Commerce. President of Swan Lake Watershed Preservation Group, a 501c3 non-profit.

References

Broker: Paul Chiles, CRE, President Chiles & Company Commercial Real Estate Services and Real Estate Commissioner for the State of Washington, 206-216-4190



Please submit to the record of the Planning Commission Hearing on 04/27/2010:

My name is GayLynn Beighton, 2507 West Beach Road, Oak Harbor, WA 98277. I am a commercial real estate broker with Chiles and Company in Seattle, WA. My career resume is attached. I am also the president of the Swan Lake Watershed Preservation Group. The mission statement of the SLWPG is: "Preserving our unique critical ecosystem and quality island lifestyle for future generations". I know that we all have the same goal, which is to maintain and enhance our quality of life.

My comments relate to the choice of methodology to analyze land capacity. I recommend using density analysis. The basic premise of countywide planning policies under GMA is to direct growth to existing urban areas, which increases density and affordable housing in those areas and to reduce sprawl in the rest of Island County. Since the enactment of the GMA in 1990 through the last Census in 2000 the population density in Oak Harbor, Island County, Washington has been decreasing.

Table 1

Census	Population	City Land Area	Average People/Acre
1990	17,176	4,836	3.55
2000	19,795	5,877	3.37
2010	21,180	6,082	3.11
Difference	4,004	1,246	-0.44
%			
Change	23.31%	25.77%	-12.39%

Information obtained from sources believed reliable. While we do not doubt its accuracy, we have not verified it & make no guarantee, warranty or representation about it. It is your responsibility to independently confirm its accuracy & completeness.

The figures contained in Table 1 were obtained from 1990 and 2000 U.S. Census data and the City of Oak Harbor.

Today, the City of Oak Harbor population is estimated to have grown to 21,180 and the land area has now grown to 6,082 acres in 2010 according to the City and UGA Area chart on pages 18 of 55 and 24 of 55 respectively of the 04/27/2010 UGA Capacity Analysis presented tonight. This calculates to an average of only 3.11 people per acre within the city and an overall trend $3.55 - 3.11 = -.44$ people/ $3.55 = -12.44\%$ **less efficient use of land**. This is an alarming trend that signals the need for careful analysis of the density and an accurate land capacity calculation for the city of Oak Harbor.

A negative change in density and the overall low number of people per acre indicates expensive, inefficient land use in our urban area. In Oak Harbor, the urban core is left to deteriorate as people are moving into former rural areas, which become suburbs of the city. Over the long term, this inefficient use of land results in urban core decay, costlier housing when the true cost of increased taxes and transportation costs are considered, increased pollution degrading our environment, increased traffic with accompanying

safety issues from congestion, our society's dependence on foreign oil and lower quality of life for all Island County residents.

The Oak Harbor urban core has experienced neglect, deterioration and disinvestment for many years. This trend will significantly change when development of the urban core is the most profitable option to developers and builders. If the land capacity is not accurate, there may be a mistake made by recommending the addition of additional land into the Oak Harbor UGA to accommodate future growth. Adding additional rural land to the Oak Harbor UGA will enable annexation of that land into the Oak Harbor city limits for the purpose of urban development. Additional raw land will compete with urban core development and slow much needed urban core revitalization to the detriment of the community. Excessive, expensive sprawl is not sustainable and will ultimately result in degradation of the quality of life of all Island County residents and visitors that will be irreversible in our lifetimes.

The methodology employed by Oak Harbor to calculate its land capacity is extremely important. Please use a methodology that analyses density. The extra effort of creating a database will be useful each time the land capacity of Oak Harbor is analyzed going forward. Such a database can be honed and improved in the years to come. It will become more valuable over time. Please remember that we all share the same goal: preserving and sustaining our quality of life. Who can argue that a walkable and vibrant downtown core is at the heart of a sustainable and economically viable city?

1 County has identified lands with the help of a consultant to identify lands with economic
2 development potential. However these two components do not constitute an analysis of the
3 County's or City's commercial and industrial needs. The Department of Community, Trade,
4 and Economic Development, the state agency charged with helping counties and cities
5 implement the GMA, has provided guidance on how to determine industrial needs.⁹⁸
6 Additionally, this Board has ruled favorably when counties and cities have worked together
7 to determine their commercial and industrial needs and then decided how to allocate them
8 before adding land to the UGA.⁹⁹ Having an adequate rationale is a needed component for
9 determining how much industrial and commercial land should be added to the UGA and for
10 sprawl prevention.
11

12
13 Densities Used in Napavine's Urban Growth Analysis

14 Both Petitioners Futurewise and Panesko argue the use of the current density of 3.2 units
15 per acre in the City of Napavine's land capacity analysis does not comply with RCW
16 36.70A.110 and RCW 36.70A.020(1) and (2). I agree for the following reasons.
17

18 Upon the adoption of the GMA, land use regulation in Washington was transformed from the
19 solitary domain of local jurisdictions to a comprehensive, coordinated, planned system
20 which recognizes common goals at a state-wide level.¹⁰⁰ In other words, *the GMA was*
21 *enacted to institute a change in land use planning, not a perpetuation in the style of*
22 *planning that was the impetus for the enactment itself.* With the GMA's adoption, a
23 statutory framework was established which seeks to create vibrant, economically-strong
24 communities where citizens can enjoy a high quality of life in a fiscally and environmentally
25 responsible manner through the implementation of a variety of tools to balance diverse
26 community interests. Of the many tools, I see the most important tool available to
27 communities is the ability to increase the density of existing and new areas of the
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31 ⁹⁸ Preparing the Heart of Your Comprehensive Plan, A Land Use Element Guide at 53-63.

32 ⁹⁹ See Futurewise v. Skagit County (Final Decision and Order (September 21, 2005) and Consolidated Compliance Order and Final Decision and Order (April 5, 2005) and Irondale Community Action Neighbors v. Jefferson County, WWGMHB Case No.03-2-0010c(August 22, 2003).

¹⁰⁰ RCW 36.70A.010

1 community by adopting policies and regulations to support infill development, encourage the
2 rehabilitation and reuse of existing structures, enable the more efficient and cost effective
3 delivery of public facilities and services, and facilitate denser development in urban areas to
4 lessen the demand for the conversion of resource lands and to promote affordable housing.
5

6 The City of Napavine's CP notes a 2005 population of 1,328 and has identified a 2025
7 population of 3,060, an increase of 130 percent. The City further notes 609 existing
8 residential units within the Napavine city limits and the unincorporated portions of the UGA,
9 thereby requiring 701 new residential units to accommodate this population growth (based
10 on 2.4 persons per household). The City has adopted a policy to *maintain the existing*
11 *density of 3.25 dwelling units per acre along with a market factor of 100%* for residential
12 needs to reflect limited opportunity for infill development and environmentally-constrained
13 lands.¹⁰¹ Based on these calculations, the City initially sought approximately 863 acres of
14 lands for expansion in order to provide adequate housing, establish an economic base, and
15 promote job growth for the additional population projected for 2025.¹⁰² This requested
16 acreage was later reduced to the 600 acres, which was the expansion area granted by the
17 County.
18
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20
21 The GMA does define *urban growth*, with this term referring to development that makes
22 intensive use of land for buildings, structures, and impermeable surfaces so as to be
23 incompatible with the use of the land for natural resource production.¹⁰³ Therefore, urban
24 density is premised on the concept of growth adversely impacting a site's capacity for
25 natural resource production. The primacy of containing urban growth within the UGA and
26 the mandate to conserve the State's irreplaceable natural resource lands are foundational
27 elements of the GMA.¹⁰⁴ But the GMA does not just seek to assign labels to land, it
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30 ¹⁰¹ City of Napavine Comprehensive Plan, Land Use Element.

31 ¹⁰² Index 118, City of Napavine Urban Growth Area Petition

32 ¹⁰³ RCW 36.70A.030(18)

¹⁰⁴ RCW 36.70.110(1); RCW 36.70A.170; *Redmond v. CPSGMHB*, 136 Wn.2d 38, 48 (1998) (Recognizing the importance of natural resource lands in GMA planning by the requirement that such lands be designated before UGA boundaries were established)

1 requires cities and counties to ensure public facilities and services demanded by their
2 citizens are adequate and available, it seeks to provide housing for all economic segments
3 of the community, to preserve open spaces for wildlife habitat and recreational
4 opportunities, to conserve natural resource lands, to protect critical areas such as streams
5 and wetlands, and much more. These foundational elements are woven throughout the
6 GMA and create a structural framework guiding jurisdictions in accomplishing the tenets set
7 forth by the GMA. The City of Napavine is required to conform to these foundational
8 elements and, therefore, the question is whether the City, in coordination with the County, is
9 calculating their UGA land needs based on these parameters so as to prevent the
10 unneeded expansion of its UGA boundaries into neighboring rural and natural resource
11 lands.
12

13
14 Although no specific numerical definition for urban density is provided in the GMA, the
15 "general rule of thumb" Futurewise advocates is not one derived from the law but from
16 sound planning principles that seek to provide efficient and economic public facilities and
17 services to any community. It is common knowledge that low-density development
18 demands more roads and expansive water and sewer lines and, by stretching these basic
19 and necessary services over large geographical areas a great burden is placed on the local
20 government mandated to provide these services. The GMA acknowledges this in Goal 2 by
21 directing that low density development be reduced or minimized – RCW 36.70A.020(2).
22 But, a community's fiscal health is only one of many benefits of density at urban levels. A
23 recent report noted that density helps to create walkable neighborhoods, supports housing
24 choices and affordability, expands transportation options, improves security, and protects
25 the environment.¹⁰⁵ The cost of low-density development is therefore well documented, yet
26 the City, in its Petition for UGA expansion notes that there are lots within the existing UGA
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31 ¹⁰⁵ *Creating Great Neighborhoods: Density in Your Community*, Local Government Commission in
32 cooperation with the U.S. Environmental Protection Agency and the National Association of Realtors (2003).
This report also noted it costs a Western US city \$10,000 more to provide infrastructure to a lower density
suburban development than to a more compact urban neighborhood, with infrastructure cost per housing unit
dropping dramatically as density increases.

1 that require improvements that are too costly to justify new development.¹⁰⁶ Which makes
2 me wonder, just how will the infrastructure cost for new development within the expanded
3 UGA be paid for if improvements within the existing area are too costly? Further, the City of
4 Napavine has a zone that requires a maximum lot size of one unit per 40,000 square feet,
5 which is clearly not an urban density or one that can be efficiently or cost effectively served
6 by urban services of sewer and water. Further, Napavine's zoning code provides no
7 mechanism to insure that low densities will not be continued throughout the UGA.¹⁰⁷
8

9
10 I acknowledge the GMA encourages local jurisdictions to preserve existing housing and to
11 ensure the vitality and character of established residential neighborhoods.¹⁰⁸ However, the
12 goal of preserving this existing character does not equate to the architectural topography of
13 a city or county to be frozen in time. There is nothing in the GMA to read that the *new*
14 *development within an expanded area of the UGA* should retain all of the same
15 characteristics, whether it is by density or architecture. In fact, to allow such a perpetuation
16 of pre-GMA standards would essentially be removing key elements of the GMA – namely
17 more compact urban growth and the reduction of low-density, sprawling development – from
18 the City of Napavine's obligations under the GMA. Without some parameters for these
19 goals and requirements, what type of GMA-planning is the City required to do?
20

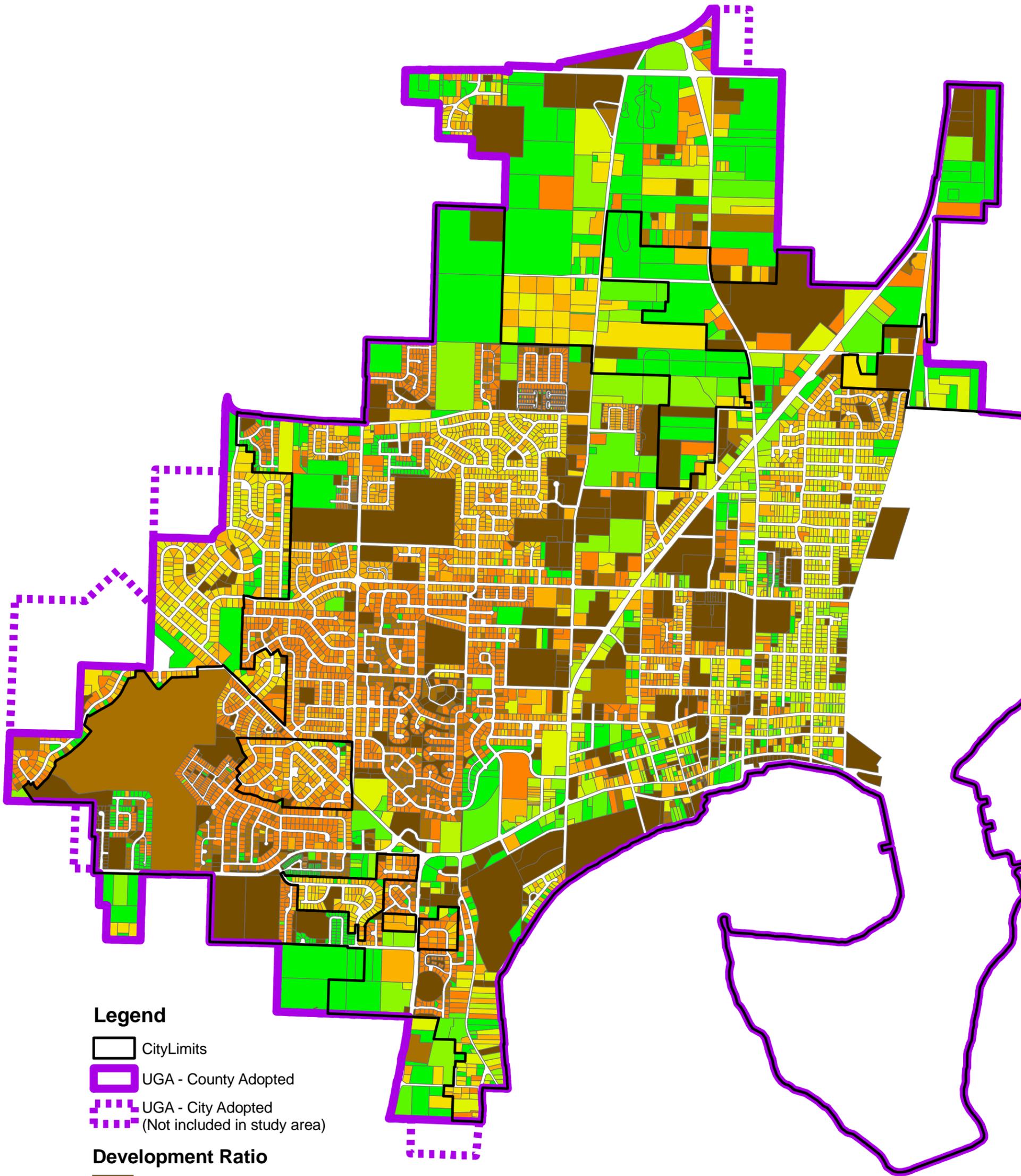
21
22 For Lewis County and its cities to continue a historic, sprawling, low-density development
23 pattern is simply unsustainable, financially and otherwise. It will exacerbate many of the
24 problems this development pattern has already created throughout Washington State —
25 diminishing natural areas and working farms, increasingly longer commutes and traffic
26 congestion, and harmful environmental impacts such as air, water pollution and flooding, as
27 well as spreading infrastructure over large and sprawling distances in an inefficient and
28 expensive manner. The density levels adopted must reflect these principles.
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32 ¹⁰⁶ Index 118, at 4

¹⁰⁷ Napavine's Zoning Code at Chapter 17.16.

¹⁰⁸ RCW 36.70A.020(4); 36.70A.070(2).

DEVELOPMENT RATIO RANGE



Legend

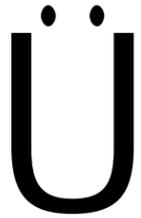
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-  UGA - City Adopted
-  (Not included in study area)

Development Ratio

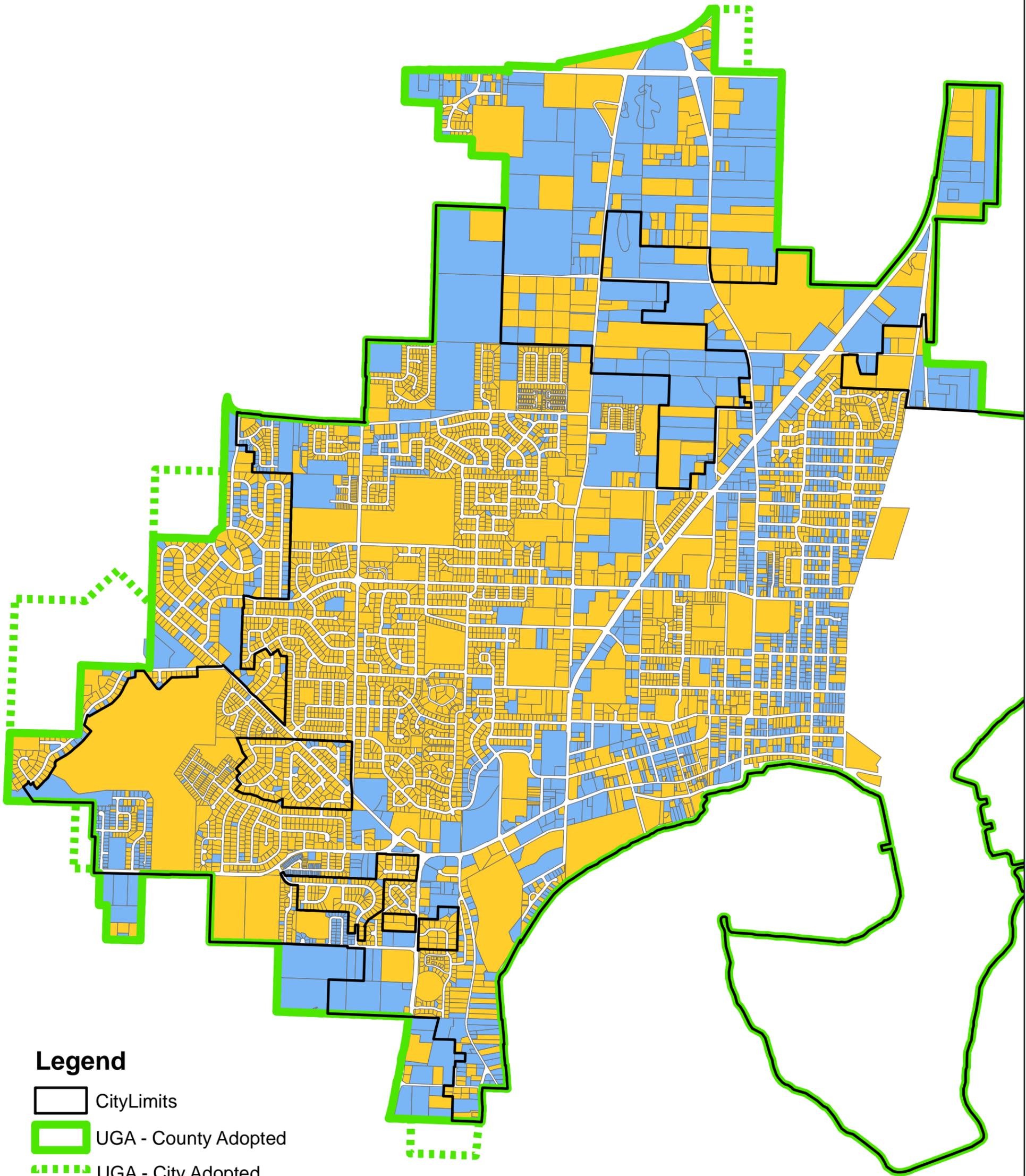
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-  11 - 20
-  21 - 30
-  31 - 40
-  41 - 50
-  51 - 60
-  61 - 70
-  71 - 80
-  81 - 90
-  91 - 100

Disclaimer:
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50%+ DEVELOPABILITY RATIO



Legend

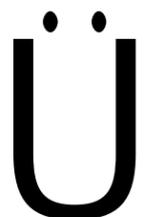
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-  (Not included in study area)

Developability

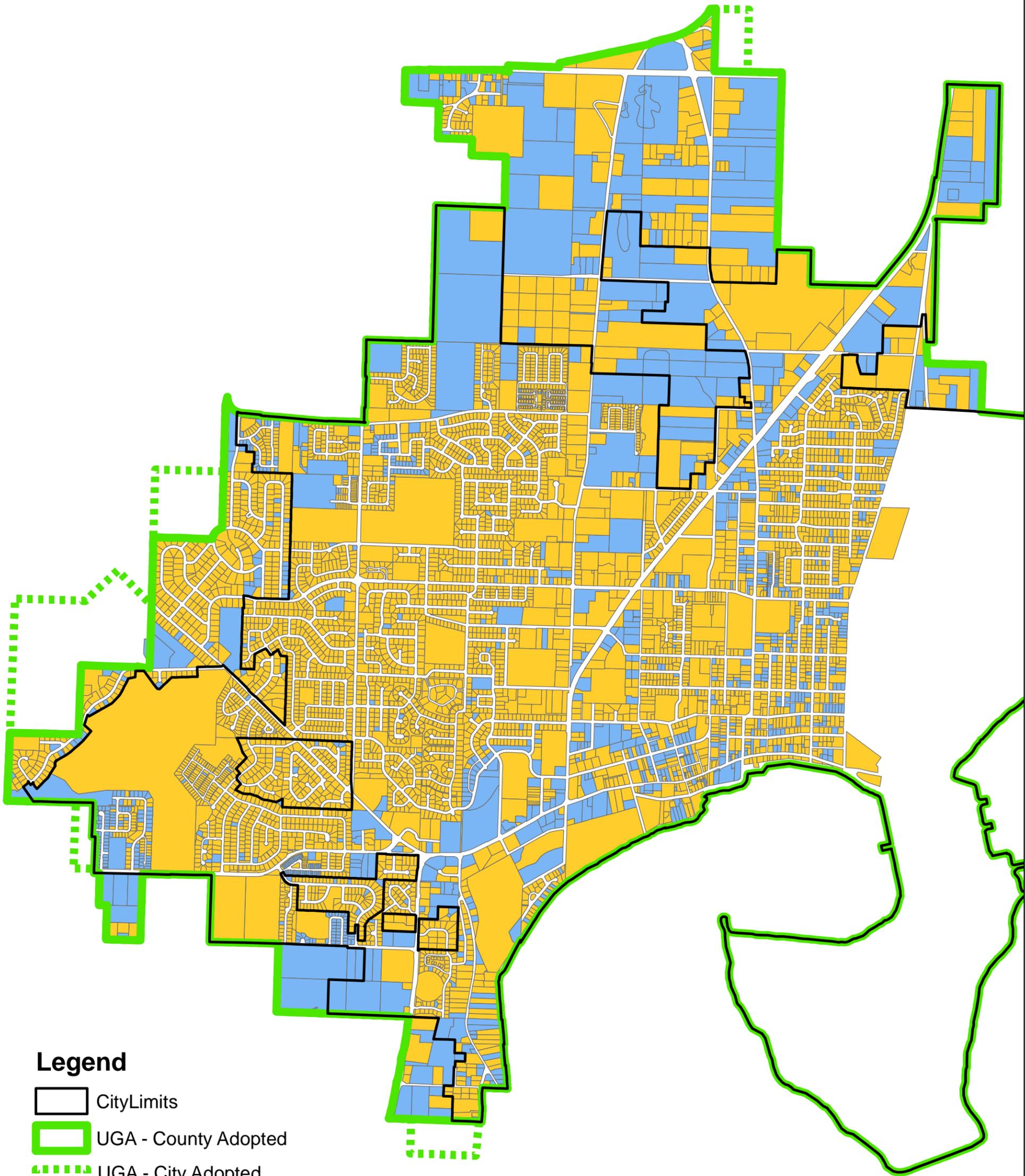
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60%+ DEVELOPABILITY RATIO



Legend

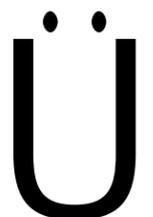
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Developability

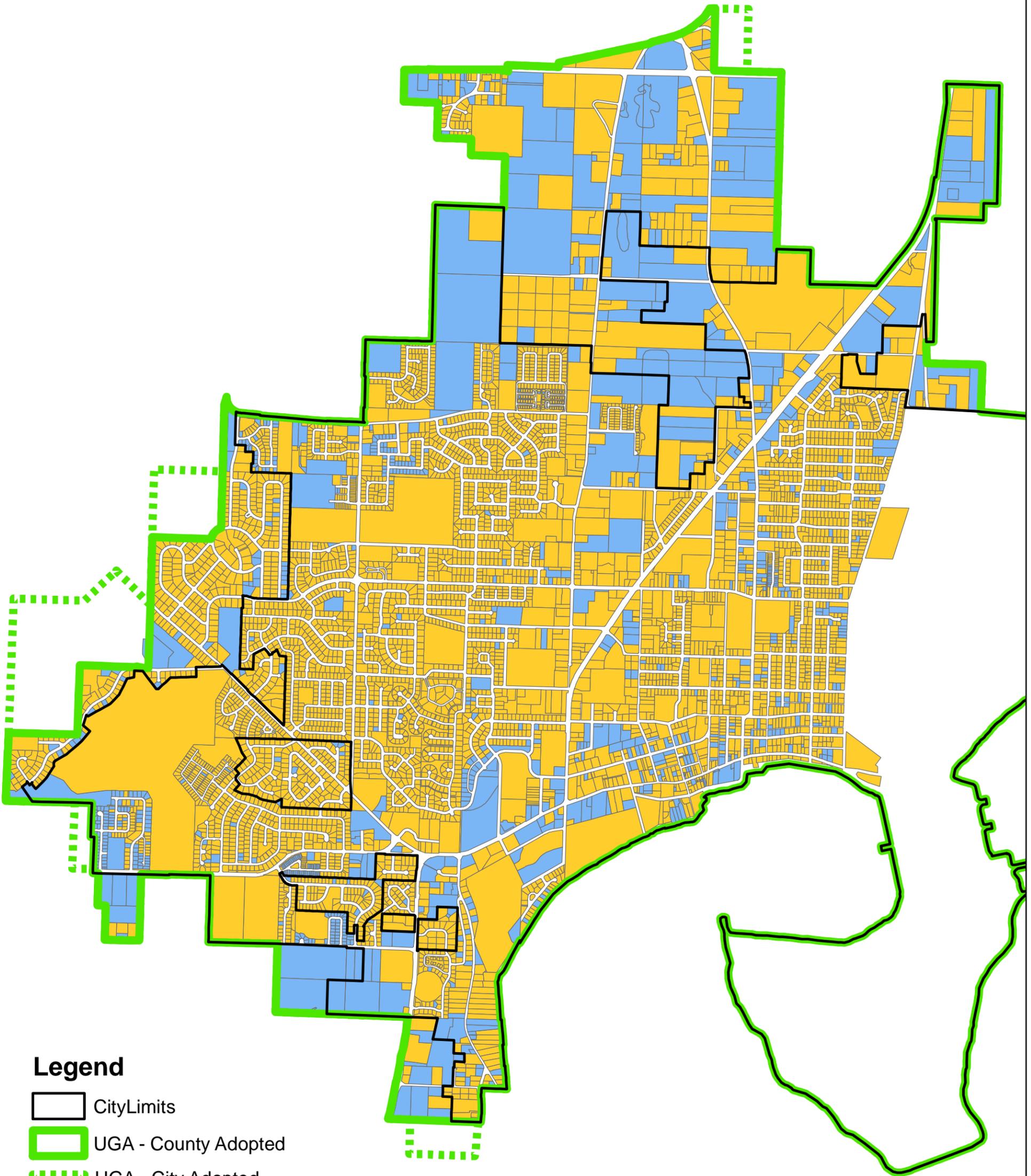
-  Properties with 60%+ Development Ratio
-  Properties with <60% Development Ratio

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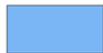
70%+ DEVELOPABILITY RATIO



Legend

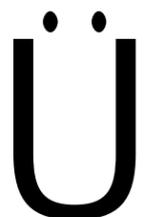
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-  UGA - County Adopted
-  UGA - City Adopted
(Not included in study area)

Developability

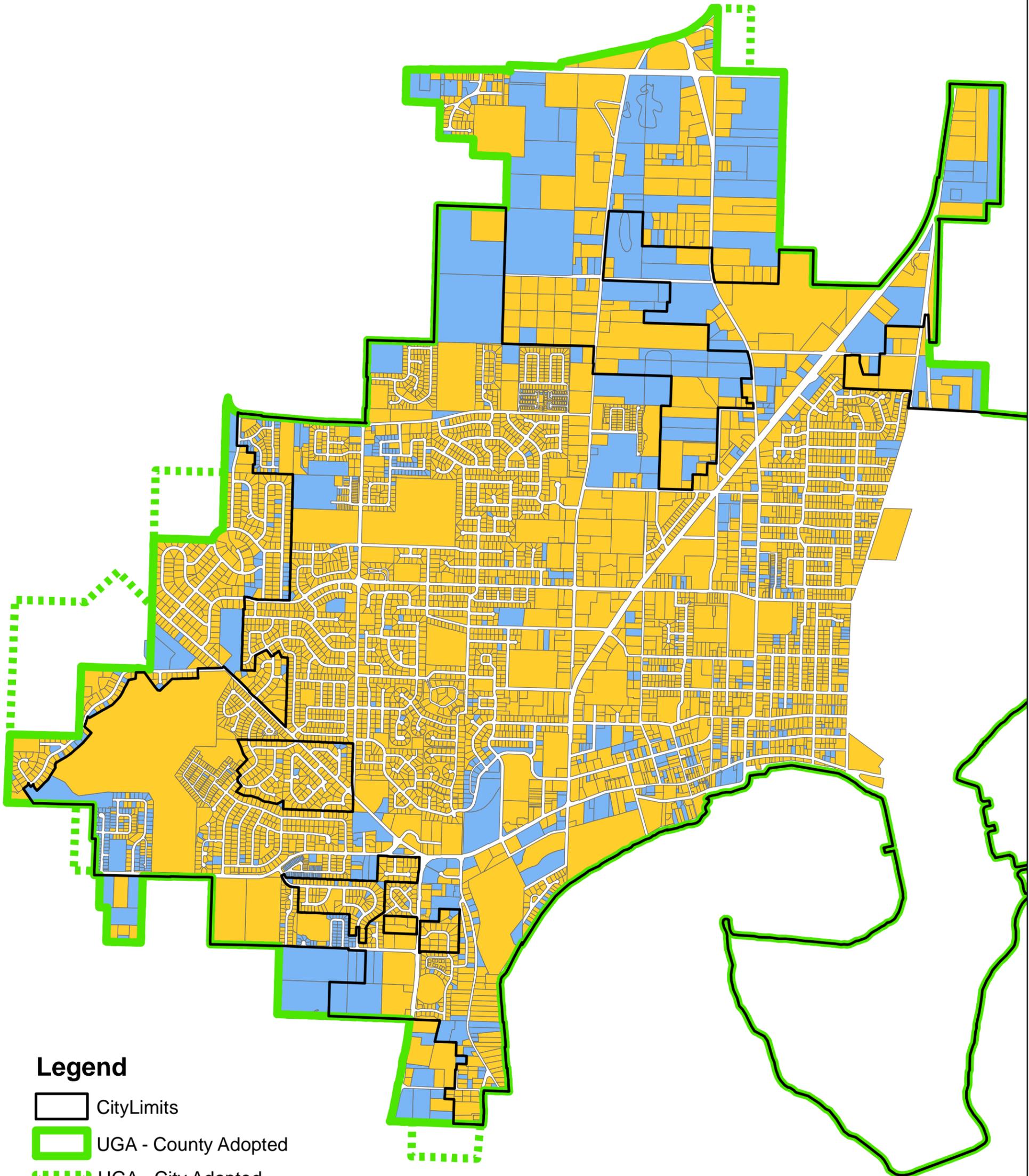
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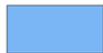
80%+ DEVELOPABILITY RATIO



Legend

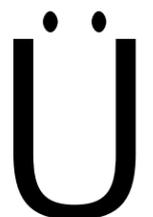
-  CityLimits
-  UGA - County Adopted
-  UGA - City Adopted
(Not included in study area)

Developability

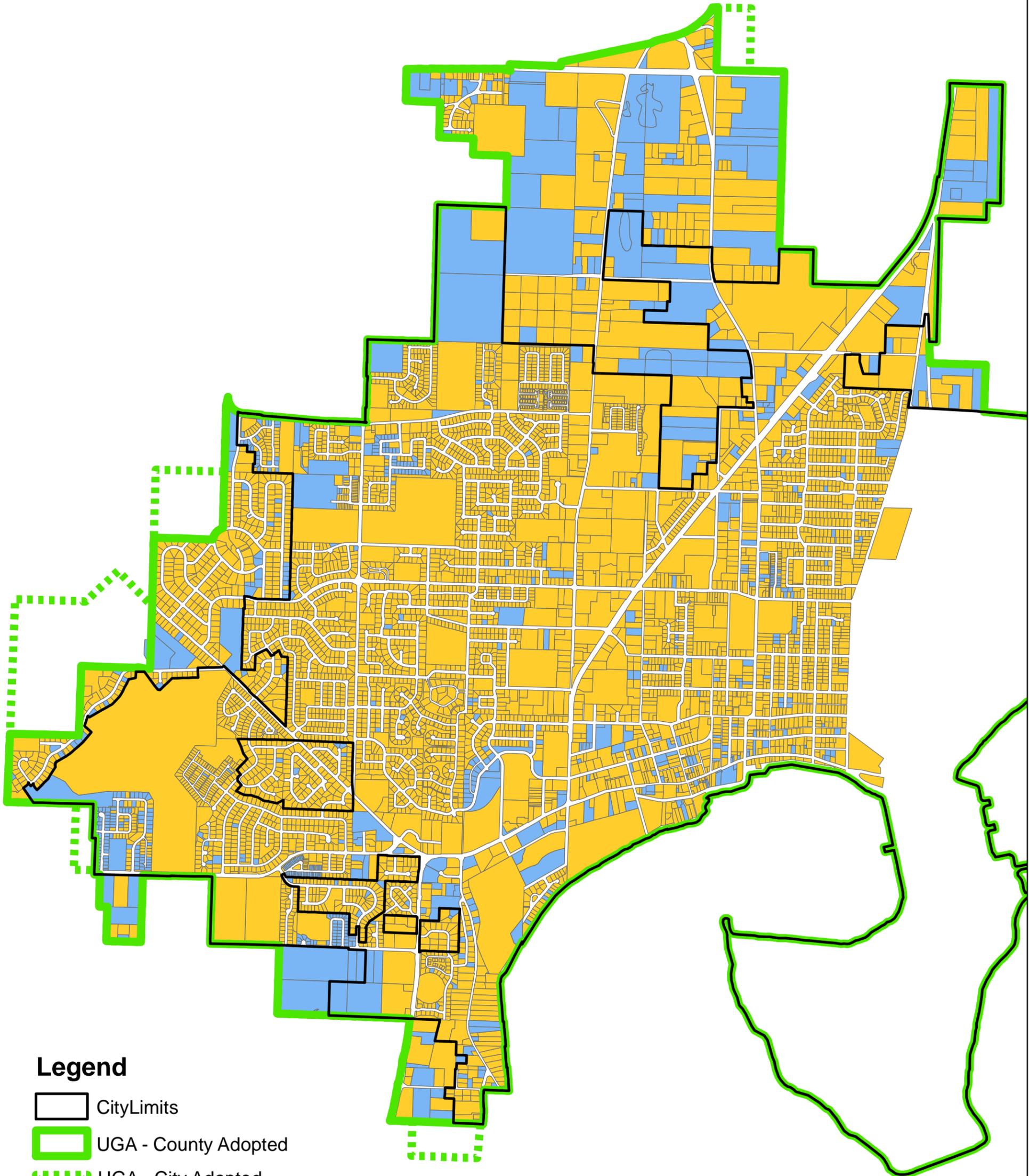
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90%+ DEVELOPABILITY RATIO



Legend

-  CityLimits
-  UGA - County Adopted
-  UGA - City Adopted
-  (Not included in study area)

Developability

-  Properties with 90%+ Development Ratio
-  Properties with <90% Development Ratio

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