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San Juan County Planning Commission

Testimony for hearing on October 19, 2001

Thank you for the opportunity to present a case regarding what I see as a significant omission in our comprehensive plan (CP).

I wrote a letter to the Planning Department in January of this year, requesting changes to the CP; a copy of this letter is enclosed as Exhibit 1. The changes I requested all speak to explaining what the CP says and means. I have not asked for changes in the substance of the CP, but in its form. Please read my letter as part of your deliberations. I don't want to waste your time now presenting that position. (The text of this letter is at www.doebay.net/forthcoming.html)

The planning department, in its undated staff report to you regarding the proposed amendments to the CP, Docket 2000-2001, essentially rejects the proposal I have made for improving the clarity and meaning of the CP. I disagree strongly with their recommendation; consequently I came today to ensure that you have the opportunity to fully understand what would **not** happen if you accept the planning department's position.

Right now, the comprehensive plan does **not** state how many people can live here, how fast we have been growing, what the likely costs of paying for all the new people will be, where those new folks will live, how we will deal with our affordable housing problem. The CP does **not** state the impacts of growth in terms of water resources, transportation impacts, noise or any environmental factors. Basically, the CP does **not** state what is implied by its maps and its policies.

Silence is a standard policy in many organizations who either do not want to figure out what their policies and regulations actually mean or, more often, actually know what the impacts of those policies are and emphatically don't want their customers, employees, suppliers, regulators or competition to share in that information.

This attitude matches well with the prevailing cultural situation in which most people are overloaded with low-value information (think tv ads) as well as having an overcommitted life style. Their need to know is generally provided by suppliers of information rather than their own initiative. They are, in short, "too busy to ask."

However, they are not too busy to want to know high-value information. High-value information affects decisions, and the higher the value, the greater the incentive to get that information. Thus the current anthrax and terrorist situation is considered very high

value information—people are asking questions with intensity. The same would be true were any of us to be told we had cancer. We would very quickly ramp up our information intake, and we would be frustrated were the answers to our questions either unavailable or inscrutable.

Inscrutable, however, is precisely what Appendix 1 of the CP is, the Appendix with the buildout information, the only part of my request for information that the planning department feels should be granted. I have included as Exhibit 2 a copy of Appendix 1 from the CP (up through the build out data) and a copy of my analysis of the deficiencies of Appendix 1, which were written as part of my Brief before the WWGMHB in 1999. The record will show that the SJC prosecutors did not challenge my analysis of the many faults of the buildout scenario offered by SJC in Appendix 1. I urge you to take the time to look this over. You will likely **not** see that the "buildout" information in Table 20, page 21, does **not** reveal what it is omitting, and that the correct buildout information is well over three times larger than offered in that table. If you read my analysis, you will discover that I had to use 5 tables provided in Appendix 1 to carefully generate a much more accurate picture of the buildout figures for SJC. The average Joe is not going to do this. The average Joe, if he looks at the CP at all, will not even go to any Appendix. If by chance he does go to Appendix 1, he will surely assume that Table 20 is accurate.

But inscrutability is more than just inaccuracy. It is also the failure to extract, from tables, information that has some real significance. To illustrate this, I have included 7 pages of tables, as Exhibit 5, which were produced by the planning department in order to generate information for a stipulated order pursuant to a request that Maile Johnson and I made regarding our need for data. We had asked for this data all during the CP remand period during 2000; data on buildout, data which was available through the county's GIS system. SJC failed to produce this data during the public review process, and only produced it via the stipulated order when they feared that our introduction *of their own GIS data into the record* would be accepted by the WWGMHB.

One of those pages of stipulated data, #260169, has a section of tabular information on it entitled "total rural lands". There is nothing apparently remarkable about this data, especially in a sea of numbers. But look at Exhibit 6. This is a chart based upon the data in this one section of this one table. This chart shows clearly what a wad of numbers does not: that 82% of the parcels in SJC's rural lands, comprising 68% of the acreage, are in 1 du/5 acre densities, and their average buildout density is 1 du/3.4 acres. (This data does **not** include the impact of guest houses). The average density in the 1 du/10 acre density parcels is 1 du/7.1 acres. Indeed, in all 3 rural lands density categories, the average density is significantly greater than the assigned density for that category (i.e., 1 du/3.4 acres is more dense than 1 du/ 5 acres, 1 du/7.1 ac is more dense than 1 du/ 10 ac, and 1 du/7.6 acres is almost twice as dense as the density category of 1 du/15 acres).

To most people, these statements, along with the chart, may well be insufficient and beg further interpretation. The Growth Management Act Hearings Boards have consistently ruled that a density greater than 1 du/5 acres is **not** rural. It is, in fact, suburban. Thus, the chart, based upon SJC's own GIS data, is saying that over 80 percent of the rural lands

parcels in the county are suburban in nature. The popular term for this kind of density is **sprawl**. Recall that this data does **not** reflect the impact of guest houses. Under land use policy 2.2.A.11 (currently under a freeze due to a Hearings Board order), every parcel could have a guest house, which theoretically would permit densities to become twice as dense. Indeed, taking all rural lands into consideration, and **not** counting guesthouses, the overall rural lands density is 1 du/4 acres. That means that all of SJC's rural lands are suburban, i.e., they are characterized by sprawl. This is **not** what the Vision Statement (Exhibit 4) implies and none of this is described or explained *anywhere* in the CP.

Another example of the omission of high-value information is the controversy over the graph of Table 1 of Appendix 1, included as a handout but not officially listed as an Exhibit. Table 1 shows the US Census data for SJC from 1870 to 1995. I charted this table into a graph for my 1999 Brief. SJC Prosecutor's vigorously, and unsuccessfully, opposed the introduction of this chart into the record. The data reveals, in chart form, how rapidly SJC is growing, and how things changed significantly starting in 1970. One cannot see this in tabular form. It is obvious in graphic form.


My point here is that the CP does **not** say much about where the county is headed. The situation here is a lot like that child's game "what is wrong with this picture?", only it is a variant on this game. The variant is "what is **missing** from this picture?" and the kicker is: **no one is even asking that question.**

Would you build a house without clear plans and a clear budget? Would you go to college, committing yourself to years of work and thousands of dollars, if you had no idea where you were headed? I don't think so. Yet because "people are busy", we often don't ask relevant questions. We expect our suppliers, schools, organizations and governments to know what we need to know and to pre-emptively or proactively offer it. We expect them to anticipate the relevant questions and provide answers.

I don't know what the standard is for what and how a CP should present information. I don't have time to dig up information on what planning students are taught is a "lousy", "good" or "great" CP format. I don't have time to read CP's from all over the country and extract out the ones that present their information clearly and thoroughly. I believe, however, that the SJC CP is woefully inadequate in stating what it means and how it will impact those of us who live, work, own property and visit here.

I urge you to read my January letter and to recommend that the information I request in that letter be fully implemented in the CP.

Cordially



Joe Symons