

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

CASCADIA WATER, LLC

Respondent.

DOCKET UW-240151

**CROSS-EXAMINATION EXHIBIT OF MATTHEW J. ROWELL AND
CULLEY J. LEHMAN
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT MJR-CJL-__X

Island County 2016 Comprehensive Growth Plan Update, Appendix B

February 6, 2025

Population Growth Analysis & Accommodations

B



B Population Growth

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TABLE OF CONTENTS

B-1	2036 POPULATION PROJECTIONS	7		
	B-1.1 Process and Methodology:	7		
	B-1.1.1 Analysis and Findings:			
B-2	REGIONAL ALLOCATIONS	9		
	B-2.1 Past Population Allocation Work	9		
	B-2.2 Methodology for 2016 Comprehensive Plan Update:	10		
B-3	URBAN GROWTH AREAS ALLOCATIONS	11		
	B-3.1 Background	11		
	B-3.2 UGA Allocations for 2036	12		
	B-3.2.1 2036 Allocations			
B-4	EMPLOYMENT PROJECTIONS	15		
	B-4.1 Methodology	16		
	B-4.1.1 Estimating Total Employment			
	B-4.1.2 Forecasting 2036 Total Employment			
	B-4.1.3 Uniformed Military Employment			
	B-4.1.4 Allocation to Planning Areas and UGAs			
B-5	BUILDABLE LANDS ANALYSIS	19		
	B-5.1 Summary of Key Findings	19		
	B-5.2 Past Buildable Lands Analysis	20		
	B-5.3 Methodology	20		
	B-5.4 Rural Analysis	21		
	B-5.4.1 General Steps			
	B-5.4.2 Determining Capacity of Non-Residential RAIDs			
	B-5.5 UGA Analysis Steps:			22
	B-5.5.1 General Steps			
	B-5.5.2 UGA Capacity - Single Family Zones			
	B-5.5.3 UGA Capacity - Multi-Family Zones			
	B-5.5.4 UGA Capacity - Commercial & Mixed Use Zones			
	B-5.5.5 UGA Capacity - Industrial Zones			
	B-5.5.6 Assumptions			
	B-5.5.7 Land needed for Public Purposes			
	B-5.5.8 Findings			
	B-5.6 Rural Areas			30
	B-5.6.1 North Whidbey Planning Area			
	B-5.6.2 Central Whidbey Planning Area			
	B-5.6.3 South Whidbey Planning Area			
	B-5.6.4 Camano Island Planning Area			
	B-5.7 Urban Growth Areas			32
	B-5.7.1 City of Oak Harbor			
	B-5.7.2 Town of Coupeville			
	B-5.7.3 City of Langley			
	B-5.7.4 Freeland Non-Municipal UGA			
	B-6 2016 UGA BOUNDARY ADJUSTMENTS			36
	B-6.1 Evaluating UGA Boundaries			36
	B-6.2 Langley UGA Resizing			37
	B-6.2.1 Rezoning related to UGA Reduction			

B Population Growth

B-6.3 Freeland NMUGA Resizing	39
B-6.3.1 Rezoning related to NMUGA reduction	

MAPS

MAP B1. Map of the 2016 Langley UGA Reduction	37
MAP B2. Langley Area Rezoning Related to UGA Resizing	38
MAP B3. Map of the 2016 Freeland NMUGA Reduction	40
MAP B4. Freeland Area Rezoning Related to NMUGA Resizing	42

FIGURES

Figure B(1) Graph of OFM Population Projections	8
Figure B(2) Island County Urban and Rural Population, 1970 - 2010	12
Figure B(3) North Whidbey Urban and Rural Growth, 1970 - 2010	13
Figure B(4) Central Whidbey Urban and Rural Growth, 1970 - 2010	13
Figure B(5) South Whidbey Urban and Rural Growth, 1970 - 2010	13
Figure B(6) Acronyms & Definitions for Buildable Lands Analysis Methodology	19

TABLES

Table B-1. OFM's Population Projections for Island County	9
Table B-2. Percent of Island County Population by Planning Area	10
Table B-3. Population Distribution by Planning Areas, Estimates and Projection	11
Table B-4. Island County Urban and Rural Growth Projections by Planning Area	14
Table B-5. Total Island County Employment Estimates for 2012 and Projections for 2036	18
Table B-6. Island County Planning Area and UGA Employment Allocations	18

Table B-7. Discount Factors for Partially Vacant Parcels	23
Table B-8. Percent of Total Acres in Critical Areas	26
Table B-9. Employees per acre in Island County UGAs	27
Table B-10. Comparison of Employment Density Assumptions from Other Jurisdictions	27
Table B-11. Island County Vacant Parcels by Zoning Designations in the Rural Areas	28
Table B-12. Summary of Buildable Lands Analysis, Towns & Cities	28
Table B-13. North Whidbey Planning Area, Buildable Lands Analysis - Rural Growth 2010 - 2036	30
Table B-14. North Whidbey Planning Area, Buildable Lands Analysis - Rural Land Capacity	30
Table B-15. Central Whidbey Planning Area, Buildable Lands Analysis - Rural Growth (2010 - 2036)	31
Table B-16. Central Whidbey Planning Area, Buildable Lands Analysis - Rural Land Capacity	31
Table B-17. South Whidbey Planning Area, Buildable Lands Analysis - Rural Growth (2010 - 2036)	31
Table B-18. South Whidbey Planning Area, Buildable Lands Analysis - Rural Land Capacity	31
Table B-19. Camano Island, Buildable Lands Analysis - Growth (2010 - 2036)	32
Table B-20. Camano Island, Buildable Lands Analysis - Land Capacity	32
Table B-21. Oak Harbor Average Net Densities	33
Table B-22. Oak Harbor UGA, Buildable Lands Analysis - Growth (2010 - 2036)	33
Table B-23. Oak Harbor UGA, Buildable Lands Analysis - Residential Land Capacity	33
Table B-24. Oak Harbor UGA, Buildable Lands Analysis - Employment Land Capacity	34
Table B-25. Coupeville UGA, Buildable Lands Analysis - Growth (2010 - 2036)	34
Table B-26. Coupeville UGA, Buildable Lands Analysis - Land Capacity	34

Table B-27.	Coupeville UGA, Buildable Lands Analysis - Employment Land Capacity	35
Table B-28.	Langley UGA, Buildable Lands Analysis - Growth (2010 - 2036)	35
Table B-29.	Langley UGA, Buildable Lands Analysis - Land Capacity (Before Resizing)	35
Table B-30.	Freeland NMUGA, Buildable Lands Analysis - Growth (2010 - 2036)	36
Table B-31.	Freeland NMUGA, Buildable Lands Analysis - Land Capacity Before Resizing	36
Table B-32.	Langley UGA Buildable Lands Analysis Summary, Before & After Resizing	37
Table B-33.	Freeland NMUGA Buildable Lands Analysis Summary, Before & After Resizing	39
Table B-34.	Freeland NMUGA, Buildable Lands Analysis Summary - After Resizing	43
Table B-35.	Rezoning Related to NMUGA Resizing, Impacts on Rural Lot Capacity	43

B Population Growth

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B-1 2036 POPULATION PROJECTIONS

The selection of a population projection is a critical step in the development of a GMA-compliant comprehensive plan. Population projections are used to ensure that UGAs are adequately sized. These projections are also used in the development of the comprehensive plan Elements.

In determining the size of UGAs, counties are required to utilize the official population projections issued by the Washington State Office of Financial Management (OFM). These projections include three distinct ranges; a low, medium, and high. In accordance with RCW 43.62.035, the medium range represents OFM's most likely estimate of a county's population. Counties must select a population projection that falls within these ranges to determine their fundamental GMA planning decisions.

B-1.1 PROCESS AND METHODOLOGY:

Island County adopted its first Comprehensive Plan in 1998 and updated the Comprehensive Plan in 2005. A review of previous OFM population ranges and an assessment of how projections compared to the County census data (testing for accuracy of projections and if any adjustments were needed) showed that the projections were overestimating the rate of growth during both review periods. Due to the consistent overage from prior projection models, the County determined that the OFM's medium series projection would be used as a base for the estimate, but additional research into Island County specific demographics would be needed to determine a more accurate projection for Island County.

County staff analyzed the assumptions of OFM's forecasting model; in those instances where OFM's assumptions seemed to contradict our own research, we made corresponding adjustments to the medium series projection.

B-1.1.1 Analysis and Findings:

To comply with the GMA requirements and calculate a population projection, Island County undertook a rigorous examination of the County demographic characteristics, economic conditions, and past growth trends, as well as data from the State of Washington and the U.S. Census Bureau. Based on this research, the County arrived at the following conclusions:

- In the year 2036, Island County is projected to have a population of 87,917. The 2010 census determined that Island County had a population of 78,506; so this represents a total projected increase of 9,411 over a 26 year period.
- While Island County has previously experienced periods of rapid growth, the growth rate has decreased in every period since 1980.
- The median age of Island County is higher than the state as a whole and is increasing at a faster rate. This increase in the median age will limit future population growth resulting from natural increase.
- In many of Island County's planning areas, previous population growth was driven by in-migration of working age people who commuted to jobs on the mainland. Increasing transportation costs,

B Population Growth > 2036 Population Projections

transportation capacity constraints, and changing consumer housing preferences may negatively impact the future in-migration of commuters.

- The in-migration of retirees which has historically been a significant component of Island County's population growth is projected to continue, but at an uncertain rate.
- Island County's 1998 and 2005 population projections significantly overestimated future population growth
- Naval Air Station Whidbey indicates that they will add squadrons over the next 20 year planning period; 2,530 people were added to the projections to account for the military expansion. NAS Whidbey is projected to disestablish one squadron in 2021. This reduction isn't accounted for in the projections, but is important to note.

After reviewing all relevant factors, the County concluded that slight reductions should be made to OFM's medium series projection to account for an anticipated drop in Total Fertility Rate, trends which indicate a decline in Island County's growth rate over the last 30 years, and reductions in the number of retirees and off-island commuters who can be expected to move to Island County in coming years.

Figure B(1) Graph of OFM Population Projections

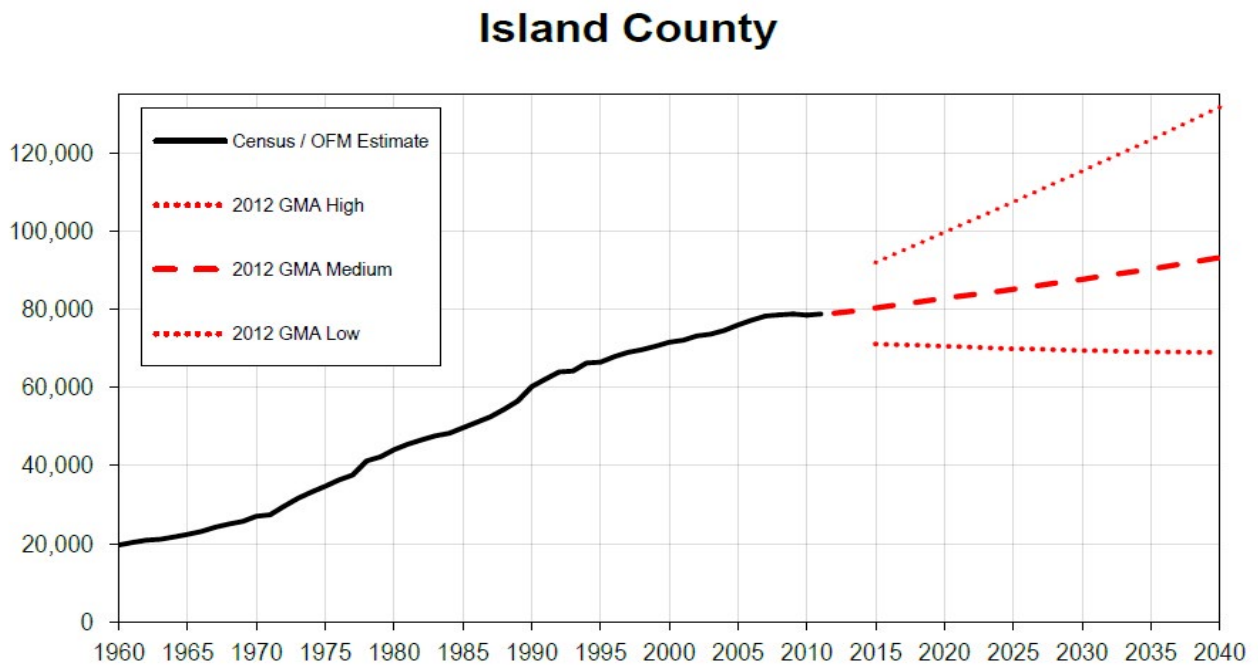


Table B-1. OFM’s Population Projections for Island County

Island County	Census		Projections				
	2010	2015	2020	2025	2030	2035	2040
Low	78,506	71,110	70,516	69,867	69,411	69,020	68,949
Medium	78,506	80,337	82,735	85,073	87,621	90,239	93,205
High	78,506	91,944	99,714	107,419	115,351	123,358	131,741

Island County reviewed the population estimates between OFM’s medium and low series and determined that the 2036 population would likely fall between the midpoint between OFM’s low and medium series (79,630) and the medium series projection (90,239). **Based on the research conducted, the population projection for 2036 is estimated at 87,917 people.**

B-2 REGIONAL ALLOCATIONS

Island County is unique in that the geographic, social, and economic characteristics of the County vary dramatically by location. For example, population growth and commuter patterns on Camano Island are heavily influenced by job growth and economic conditions in Snohomish County, and there is very little economic interaction between Camano Island and the rest of the County. Similarly, growth in the Oak Harbor area is driven almost entirely by Naval Air Station Whidbey, while off Island commuters and retirees are responsible for population changes on the southern end of Whidbey Island. Growth in Central Whidbey, on the other hand, does not appear to be influenced by employment in adjacent counties, but is driven to a larger extent by retirees, people commuting to Oak Harbor, or those employed by Island County or Whidbey General Hospital. Because of the regional differences, Island County has historically divided the County into four distinct planning areas. These planning areas include; Camano Island, North Whidbey, Central Whidbey, and South Whidbey. Because each planning area exhibits unique population and employment trends, the County has historically developed population and job growth estimates for each planning area.

B-2.1 PAST POPULATION ALLOCATION WORK

The allocations associated with the 2005 update were significantly more accurate than those associated with the 1998 Comprehensive Plan. To a large extent, this improvement resulted from beginning the process with a more accurate countywide population estimate. During the 1998 update, the estimate was allocated to each planning area using a proportional share method, whereby the countywide population estimate is allocated to each planning area based on the proportion of the County’s population that has historically lived in each planning area. In 2005 the County moved away from the strict proportional share distribution model and instead included a growth rate method. The growth rate method analyzed previous growth rates within each planning area and projected these rates into

B Population Growth > Regional Allocations

the future. The minor difference between the proportional share and growth rate methods used in 2005 is particularly notable. In two of the four planning areas, North Whidbey and Camano Island, the proportional share method provided the most accurate allocation, while the growth rate method resulted in more accurate allocations in the South and Central Whidbey Planning Areas. In all but one case (South Whidbey) both allocation methods resulted in allocations that were within 4% of one another.

The share of the Island County’s population living in each planning area has remained remarkably stable over the past forty years. This consistency constitutes one of the more notable population trends in the County. Staff began the regional allocation process by allocating population to each planning area based on the proportion of the County’s population that historically lived in each planning area. Island County tested these allocations against relevant demographic, transportation, and market conditions in an attempt to determine if the projected allocation was reasonable or not. Island County determined that the proportional share method should reduce the inaccuracies resulting from the growth rate method employed during the 2005 update.

Table B-2. Percent of Island County Population by Planning Area

Planning Area	1970	1980	1990	2000	2010
North Whidbey	58%	58%	57%	49%	47%
Central Whidbey	16%	14%	13%	13%	16%
South Whidbey	17%	17%	17%	20%	17%
Camano Island	10%	12%	13%	19%	20%

B-2.2 METHODOLOGY FOR 2016 COMPREHENSIVE PLAN UPDATE:

After developing a forecast for the 2036 population for Island County, this forecast is then divided into regional components, representing the County’s four Planning Areas (North, Central, and South Whidbey, and Camano Island). As a final step, each regional allocation is further divided into urban and rural allocations, with the urban component representing the expected Urban Growth Area (UGA) growth.

Having established the estimated countywide population growth for the next planning period, the County began the process of allocating the anticipated growth to each of the Planning Areas. Based on research, the County arrived at the following conclusions:

- The general distribution of growth is projected to be substantially similar to past trends, with the projection that the majority (49 percent) of the population living in the North Whidbey Planning Area, 13 percent in the Central Whidbey Planning Area, 19 percent in the South Whidbey Planning Area, and 19 percent on Camano Island in 2036.
- The population of the North Whidbey Planning Area is projected to increase by 17 percent. This increase includes both the normal expected population growth, and the population growth

Population Growth > Urban Growth Areas Allocations

B

- associated with the planned expansion at Naval Air Station Whidbey. 60 percent of the anticipated North Whidbey population growth is expected to occur within the Oak Harbor UGA.
- The Central Whidbey Planning Area is expected to grow by 9 percent. Approximately 15 percent of this population growth is expected to occur within the Coupeville UGA.
 - The Population of the South Whidbey Planning Area is expected to grow by 8 percent. 19 percent of this population growth is expected to occur within the Freeland and Langley UGAs. Freeland's UGA will be allocated 61 percent of that growth and Langley will be allocated 39 percent.
 - The population of the Camano Island Planning Areas is expected to increase by 9 percent.

Table B-3. Population Distribution by Planning Areas, Estimates and Projection

Island County Planning Areas	1970	1980	1990	2000	2010	2036 Projection	
North Whidbey	15,600	25,500	34,592	34,737	36,757	43,003	49%
Central Whidbey	4,311	6,148	8,205	9,458	10,524	11,487	13%
South Whidbey	4,500	7,300	10,069	14,016	15,564	16,803	19%
Camano Island	2,600	5,100	7,329	13,347	15,661	16,624	19%
Island County	27,011	44,048	60,195	71,558	78,506	87,917	
Growth	7,373	17,037	16,147	11,363	6,948		
Growth Rate	38%	63%	37%	19%	10%		

B-3 URBAN GROWTH AREAS ALLOCATIONS

B-3.1 BACKGROUND

With the adoption of the 1998 Comprehensive Plan, Island County established a goal of increasing the percentage of growth occurring within designated UGAs. The purpose of this goal is to protect farm and forest land, maintain the County's rural character, efficiently provide government services, and to ensure compliance with GMA requirements. With the exception of the North Whidbey Planning Area it does not appear that this goal has been achieved. In fact, an absolute decline in the percentage of growth occurring within the Coupeville UGA was recorded between 2000 and 2010. While Figure 5.11 would appear to suggest an increase in the percentage of urban growth occurring in the South Whidbey Planning Area, this increase resulted from the establishment of the Freeland UGA. Historically, growth in Freeland has been urban in nature, merely recognizing this growth as urban by designating Freeland a UGA, does not indicate a fundamental shift in development patterns from rural to urban.

B Population Growth > Urban Growth Areas Allocations

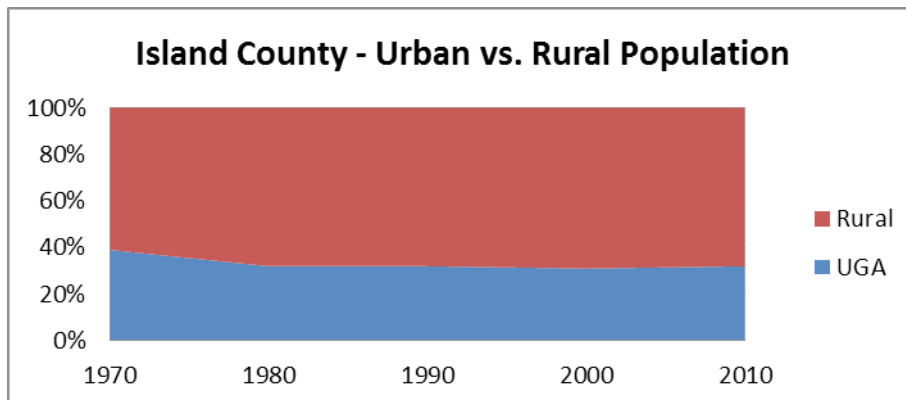
In 1997 the GMA was amended to allow counties to designate Limited Areas of More Intensive Development (LAMIRD). This provision allowed existing areas of higher density residential, commercial, and industrial development to be formally recognized. Island County took advantage of this provision by designating a number of Rural Areas of Intense Development (RAIDs). Island County’s RAIDs are implemented by the Rural Center (RC), Rural Village (RV), Light Manufacturing (LM), Rural Service (RS), Airport (AP), and Rural Residential (RR) zones. Island County’s RAIDs encompass approximately 10,480 acres.

Because RAIDs tend to accommodate development which is more urban than rural, a significant amount of development which would otherwise occur within designated UGAs has likely been occurring in RAIDs instead. This is understandable given that many of Island County’s RAIDs are located in desirable waterfront areas or in planned communities. Washington State law, however, generally prohibits the expansion of RAID boundaries; and it is possible that future development within the County’s existing RAIDs may be constrained by a lack of land available for development, or a lack of available drinking water. If this is the case, much of the development currently taking place within RAIDs will gradually shift to the County’s UGAs over time. Planning and Community Development recommended that historic development patterns be used to establish a base for future discussions regarding allocations to individual UGAs.

B-3.2 UGA ALLOCATIONS FOR 2036

In order to establish a rational starting point for the allocations to individual UGAs, Island County analyzed the split between urban and rural growth in each of the planning areas over a forty year period, beginning in 1970. Island County did not formally establish UGAs until the adoption of the 1998 Comprehensive Plan; however, the boundaries of the incorporated cities of Oak Harbor, Coupeville, and Langley were used for this analysis, along with the Census Designated Place boundaries for Freeland. Although these boundaries do not correspond exactly with current UGA boundaries, they are similar enough for purposes of comparing historic urban and rural growth rates. Figures 5.9, 5.10, and 5.11 illustrate the relative percentage of urban and rural growth in each planning area. No graph was prepared for the Camano Island Planning Area as Camano Island has no UGA.

Figure B(2) Island County Urban and Rural Population, 1970 - 2010



Population Growth > Urban Growth Areas Allocations

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Figure B(3) North Whidbey Urban and Rural Growth, 1970 - 2010

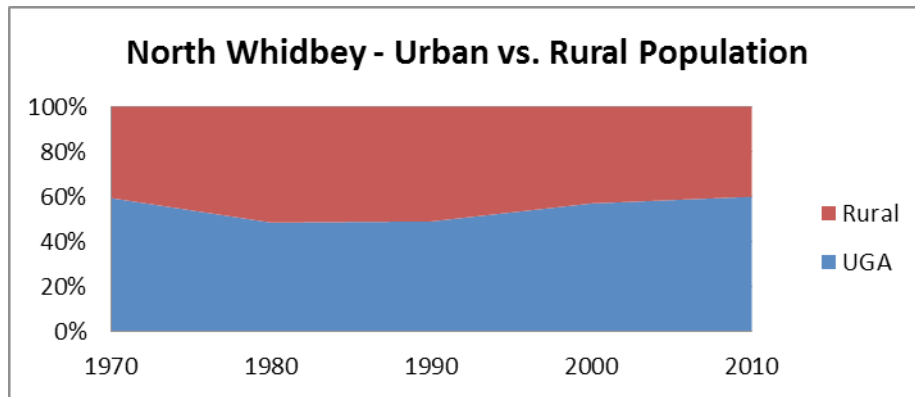


Figure B(4) Central Whidbey Urban and Rural Growth, 1970 - 2010

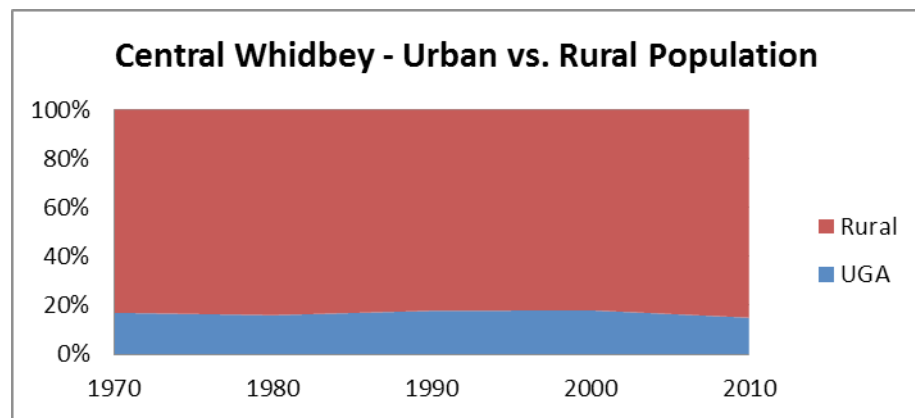
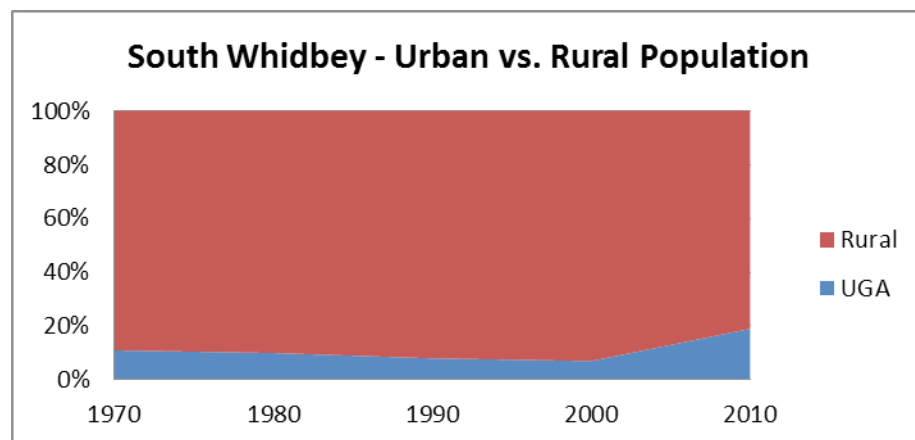


Figure B(5) South Whidbey Urban and Rural Growth, 1970 - 2010



B Population Growth > Urban Growth Areas Allocations

B-3.2.1 2036 Allocations

Based on the analysis above, the distribution of population among the County's four planning areas has remained relatively constant over the past forty years. As such, the population to each of the County's planning areas was allocated based on a strict proportional allocation.

Below are the 2036 regional allocations:

- **North Whidbey:** The population of the North Whidbey Planning Area can be expected to increase by 6,246 from 2010 to 2036. At a minimum, 60 percent (3,739) of this growth should be expected to occur within the Oak Harbor UGA.
- **Central Whidbey:** The Central Whidbey Planning Area can be expected to increase by 991 from 2010 to 2036. At a minimum 15 percent (149) of this growth should be expected to occur within the Coupeville UGA.
- **South Whidbey:** The South Whidbey Planning Area can be expected to increase by 1,211 from 2010 to 2036. At a minimum, 19 percent (230) of this growth should be expected to occur within the Freeland and Langley UGAs, with Freeland's UGA allocated 61% of that growth and Langley will be allocated 39%.
- **Camano Island:** The Camano Island Planning Area can be expected to increase by 1,018 from 2010 to 2036; all of this growth will be rural (no UGAs).

Table B-4. Island County Urban and Rural Growth Projections by Planning Area

Planning Area	2010 Population	2036 Population	Growth	Urban Growth*	Rural Growth*
North Whidbey	36,757	42,989	17.0%	60%	40%
Central Whidbey	12,458	13,448	7.9%	15%	85%
South Whidbey	13,630	14,841	8.9%	19%	81%
Camano Island	15,661	16,679	6.5%	N/A	100%

Island County has its origins as a unique island community, with rural residences, vacation homes, small farms, and extremely limited urban development. To support this approach to growth, well before the Growth Management Act, small lots were created along the County's shorelines and elsewhere throughout the County. Growth was not specifically directed to more urbanized locations.

This approach changed when the County adopted its first GMA Comprehensive Plan and implementing development regulations. The County down-zoned rural properties throughout the County, establishing minimum five acre lot size requirements. Although pre-GMA lots remain throughout the County, this was the start of County efforts to encourage denser growth in urban areas and to protect rural areas for rural uses. The County continues with its efforts to further encourage urban development and protect its

rural lands. Recent County successes with this work include:

- Working with its cities to comprehensively update the County Wide Planning Policies, which establish the overarching framework for growth within the County; and,
- Working with citizens, interest groups, and state agencies, including Ecology, to update the Shoreline Master Program, which protects one of the County's most important assets - its shoreline areas.
- The County continues its work to direct growth to its urban areas. Efforts include:
- Coordinating with its cities on successfully absorbing growth which is supported by urban infrastructure and services;
- Exploring ways to shift growth to the Freeland NMUGA, the only urban area under County jurisdiction; and,
- Monitoring growth occurring in the rural areas and exploring strategies to avoid sprawl, preserve open space, and encourage growth in developed and urban areas.

These and other measures are further addressed throughout the County's Comprehensive Plan. With its Plan, the County tailored its approach to reflect the unique conditions of each planning area. For example, on Camano Island, there are no urban areas to direct growth to. So population growth allocated to Camano will occur within the rural area. But, county-wide, the County is encouraging urban growth within urbanized areas.

The County made another significant decision on growth with its periodic review. Rather than seeking to expand its urban areas, the County made a policy choice to adopt a population projection that falls between OFM's medium and low projections and to scale back its UGA's in certain locations where that made good planning sense.

Overall, while the County has land use patterns which are vestiges of its past as a unique rural, island community, in planning for the next twenty years under GMA, the County has worked cooperatively with its cities to develop an overall framework which protects rural areas and adequately supports urban areas consistent with the GMA framework.

B-4 EMPLOYMENT PROJECTIONS

Island County coordinated with BERK consulting and the Skagit Council of Governments to develop a 2036 employment projection. The County obtained data from the Washington State Employment Security Department (ESD) to develop a baseline 2012 employment estimate. ESD only reports jobs that are covered by unemployment. This excludes some categories such as those who are self-employed by a non-incorporated company, corporate officers, church employees, elected officials, railroad workers and uniformed military. To estimate the number of uncovered jobs, BERK gathered data from the Washington Employment Estimates (WEE), the QCEW 2012 Average Annual Employment total, and NAS Whidbey staff. The 2012 total Island County employment estimated is 23,989 jobs.

B Population Growth > Employment Projections

BERK forecasted the 2036 total employment level based on the calculation of a population to employment ratio (PER) and the assumption that the County's PER will continue to track closely with the State's PER from 2012 - 2036. Based on an analysis of past trends, it is assumed that the distribution of jobs across sectors will not significantly change from 2012 – 2036. Naval employment was treated differently, as it is not dependent on the local economy, but rather, is determined by U.S. Navy staffing decisions. Oak Harbor planning staff worked with the U.S. Navy and determined that there will be an increase of 1,000 uniformed military personnel at Whidbey Naval Air Station by 2036. This was added to the standard job forecast based on the population to employment ratio to arrive at a 2036 employment forecast of 26,020 jobs.

The results of the employment projects can be summarized as follows:

- The baseline employment estimate for Island County in 2012 is 23,989 jobs and the forecast is 26,020 jobs in 2036. This represents a growth of 2,031 jobs, 1,000 of which are expected to be uniform Navy jobs.

B-4.1 METHODOLOGY

BERK consulting developed the following methodology to identify the 2012 Island County employment estimate and produce the 2036 employment projection.

B-4.1.1 Estimating Total Employment

Covered employment from the Washington State Employment Security Department (ESD), as reported for the Quarterly Census of Employment and Wages (QCEW), was acquired through the Skagit Council of Governments (SCOG). Due to privacy concerns some of the data was suppressed to protect individual businesses from being identified. Data from the 2nd quarter of 2012 reported the total covered (non-suppressed) County employment at 15,201.

Suppressed data was substituted for three sectors (Mining, Utilities and Management of Companies and enterprises) using older available data. As a result, the total covered employment added to the supplemented suppressed data was 15,220.

ESD covered employment estimates do not include several employment types. These are: non-incorporated self-employed, corporate officers, church employees, elected officials, railroad workers and uniformed military. To compensate for these missing jobs in the QCEW data, a methodology developed by PSRC was used to estimate total employment from covered employment. The Puget Sound Regional Council (PSRC) methodology draws on additional data sources to supplement QCEW. The following data sources were used:

- Current Employment Statistics (CES) produced by ESD are to be used to compensate for corporate officers, elected officials, church and railroad workers. The CES annual average is used as a control total. However, CES data is not available for Island County. A conversation with the ESD regional economist indicated that the Washington Employment Estimates (WEE) data set was available for Island County and would compensate for the same uncovered employees

as the CES data set. The WEE 2012 control total was compared to the QCEW 2012 Average Annual Employment Total to calculate a multiplier of 0.028 that was applied to the totals of each employment sector. Additional jobs with WEE control total adjustment were 423.

- The Current Population Survey (CPS), a national source, was used to compensate for non-incorporated self-employed people. A national multiplier of .067 was applied to each sector. Additional jobs with CPS multiplier adjustment were 1,046. The sum of all adjusted sector estimates yielded a total, non-uniformed military employment in the County of 16,689.
- Based on information from NAS Whidbey staff, the base has an estimated 7,300 uniformed military jobs. Adding those jobs to the County total yielded a 2012 estimate of current total County employment, including uniformed military.
- **Based on the above analysis, it is estimated that in the year 2012 total County Employment will be 23,989.**

B-4.1.2 Forecasting 2036 Total Employment

The 2036 employment forecast is based on the calculation of a population to employment ratio (PER) and the assumption that the County's PER will vary similarly to the State's PER from 2012 – 2036. It is also assumed, based on past trends, that the distribution of jobs across sectors will not significantly change from 2012 – 2036.

- The 2012 PER for the County was generated using the April 1, 2013 OFM estimate and the total County employment estimate.
- The current PER for Washington State and a 2036 PER for Washington State was generated using OFM's Forecast of Washington Labor Force, 2013 and April 1st Population Estimates. The change in the State's PER between 2012 and 2036 was calculated.
- The same rate of change (2012 – 2036) in the PER for the state was applied to the 2012 County PER, yielding a 2036 PER for the County. This PER ratio is 3.51.
- The Island County 2036 PER was applied to the population forecast to yield a total employment forecast for 2036. Because military jobs are not assumed to grow at the rate of other sectors, the PER was not applied to military employment. Military growth was covered separately as shown below.
- The share of total 2012 employment that each job sector represented was determined. That share was then applied to the total 2036 employment forecast to yield a 2036 forecast of jobs in each sector.
- The total 2036 forecast for non-military jobs is 17,720, derived by dividing the 2036 PE ratio by the County's total 2036 population forecast, then subtracting the existing 7,300 military jobs.

B Population Growth > Employment Projections

B-4.1.3 Uniformed Military Employment

Uniformed military employment is not likely to change in the same manner as County employment as a whole. Naval employment is not dependent on the local economy; rather it is determined by U.S. Navy staffing decisions. Therefore, uniformed military job forecasting is handled differently. Oak Harbor planning staff worked with the U.S. Navy to determine an expected growth of 1,000 uniformed military personnel in the County. This figure was added to the 2012 military employment estimate in order to arrive at a 2036 employment forecast.

Table B-5. Total Island County Employment Estimates for 2012 and Projections for 2036

Year	Non-military Employment	Military Employment	Total
2012	16,689	7,300	23,989
2036	17,720	8,300	26,020

B-4.1.4 Allocation to Planning Areas and UGAs

The distribution of jobs over time in Island County has been relatively static (with the exception of naval employment). Based on this, the current 2012 distribution of jobs was applied to the 2036 employment projection to arrive at the following results:

Table B-6. Island County Planning Area and UGA Employment Allocations

	2012 Total	2012 Share	Est. 2036 Total	2012 Urban/Rural Split		Est. 2036 Urban/Rural	
				Urban (inside UGA and/or city limits)	Rural (outside UGA)	Urban (inside UGA and/or city limits)	Rural (outside UGA)
North	16,613	69%	18,011	42%	58%	7,812	10,199
Non-Military	9,313	39%	9,711				
Military	7,300		8,300				
Central	2,864	13%	3,110	66%	34%	2,056	1,054
South	3,552	15%	3,857	51%	49%	1,958	1,899
Langley	592					643	
Freeland	1,211					1,315	
Camano	960	4%	1,042		100%		1,042
Total	23,989		26,020			11,826	14,194

B-5 BUILDABLE LANDS ANALYSIS

As part of the 2016 Comprehensive Plan update, Island County has completed an analysis to estimate the amount of land available for development in Island County. The analysis evaluated current land use patterns and the amount of land which could be subdivided, developed, or redeveloped.

B-5.1 SUMMARY OF KEY FINDINGS

The results of the 2016 Buildable Lands Analysis can be summarized as follows:

Figure B(6) Acronyms & Definitions for Buildable Lands Analysis Methodology

Critical Area Constraint Factor (CF) | A number representing the percentage of RAID or UGA land which is presumed to be constrained by critical areas, and therefore less likely to be available for development.

Development Potential (DP) | Non-Residential & Multi-Family Residential: The number of acres available for non-residential and multi-family residential development in each industrial, commercial, mixed use, and multi-family zone. In this analysis, DP is used as a subtotal to express the gross capacity of vacant or re-developable parcels before the Total Development Potential is calculated.

Development Potential (DP), Single-Family Residential | The potential number of lots or dwelling units which can be created by dividing or developing vacant or partially vacant parcels in zones which permit single-family residential development. In this analysis, DP is used as a subtotal to express the gross capacity of vacant or partially vacant parcels before the Total Development Potential is calculated.

Partially Vacant Parcel (PVP) | A partially vacant parcel is a parcel which contains an existing dwelling unit but which is large enough to be divided.

Public Purpose Land (PPL) | Includes land required for such things as streets, drainage facilities, and parks/open space.

Re-Developable Parcel (RP) | A parcel zoned for non-residential uses or multi-family residential uses that has the potential to be redeveloped and used more intensively.

Total Development Potential, Non-Residential & Multi-Family Residential (TDP) | The total gross quantity of land available for multi-family or non-residential development before land is subtracted to account for public purposes and critical areas. The sum of the development potential of all vacant parcels and re-developable parcels for each commercial, industrial, multi-family, and mixed-used zoning designation.

Total Net Capacity (TNC) | The total net capacity of each single-family, multi-family, industrial, commercial, and mixed use zone after land is subtracted for public purposes and critical areas. Total Net Capacity is expressed in acres for multi-family and non-residential zones, and dwelling units or lots for single-family zones.

Total Development Potential, Residential (TDP) | The total gross number of lots or dwelling units which could be created by dividing and/or developing all vacant and partially vacant parcels available for single-family development before land is subtracted to account for public purposes and critical areas. The sum of development potential of all vacant parcels and partially vacant parcels for each single-family zoning designation.

Undevelopable Parcel (UP) | Parcels which are not likely to be available for development because they are owned by a charitable organization, institution, or governmental entity. Undevelopable parcels shall be identified based on Assessor's parcel data. Parcels which are tax exempt based on Assessor's parcel data shall be considered undevelopable.

Vacant Parcel (VP) | A parcel either vacant or has an improved value of less than \$4,000 based on Assessor's parcel data. Parcels which contain a mobile or manufactured home shall not be considered vacant even if they have an improved value of less than \$4,000.

B Population Growth > Buildable Lands Analysis

- Rural Island County, including Rural Areas of Intense Development (RAIDs), has capacity to accommodate non UGA population growth under current zoning regulations
- All UGAs within Island County (Oak Harbor, Coupeville, Langley and Freeland) have land to accommodate projected population growth under current zoning regulations
- Using average densities achieved by new developments since 2000, the analysis also indicates that the Oak Harbor UGA has adequate land capacity for the projected population
- Adequate land is available for projected employment growth in the Oak Harbor, Langley and Freeland UGAs
- The analysis indicated that the Coupeville UGA does not have adequate land for the projected employment growth

B-5.2 PAST BUILDABLE LANDS ANALYSIS

Island County has performed two comprehensive land use inventories in the past, one in 1983 and one in 1996. The 1983 analysis did not use zones to categorize land use characteristics; rather, it showed the primary use of the land, regardless of its zone. For example, a parcel was considered residential if it was less than five acres and had a dwelling unit on it, or it was located in a long plat. In 1996, Island County performed a more thorough analysis of land capacity based on zoning designation. The analysis showed a substantial development potential for the rural areas of Island County. Since 1996, Island County has reclassified the zoning categories and has resolved any split-zoned parcels. Therefore, neither of the previous studies can be directly compared to the analysis performed in support of the 2016 update.

B-5.3 METHODOLOGY

As part of the 2016 Comprehensive Plan update, Island County developed a framework for performing a buildable lands analysis which can be used in future analyses. The use of a consistent methodology allows the County and municipalities to track development over time and better identify trends. Staff reviewed the methodology used by other Washington counties and cities, guidance provided by the Washington Department of Commerce, and relevant court cases to develop the buildable lands analysis methodology. Island County has incorporated the methodology into the revised Countywide Planning Policies.

The Buildable Lands Analysis began by separating all of the parcels in Island County into either Urban Growth Areas or Rural Areas, including Rural Areas of Intense Development (RAIDs). Parcels that were either vacant or large enough to be further subdivided under the zoning regulations were considered buildable lots. The rural analysis stopped at this point. Within UGAs, land was removed to account for critical areas and land needed for public purposes. This resulted in an estimate of the land available within the UGA, which could be compared to the population and employment estimates for 2036 to determine if each UGA contained enough land to accommodate the projected growth in jobs and housing.

B-5.4 RURAL ANALYSIS

B-5.4.1 General Steps

- A. Identify all parcels within a UGA and exclude these parcels from further analysis.
- B. Separate parcels by zoning category and identify lands zoned park/open space, special review district, airport, or any other designation which does not allow for residential development. These parcels should be excluded from further analysis.
- C. Separate residential RAIDs from nonresidential RAIDs by zoning designation. Residential RAID parcels should be analyzed separately from non-residential RAID parcels as described below.
- D. For each zoning designation, identify all undevelopable parcels (UP) based on tax classification. Parcels which are publicly owned or tax exempt (parks, schools, churches etc.) should be considered undevelopable and excluded from further analysis.
- E. For each zoning designation, calculate the development potential of all vacant parcels (VP). The development potential of vacant parcels is determined by dividing the parcel area required by the minimum lot size allowed in the zone and rounding down. For example, a 17 acre parcel in the Rural zone could be divided into three five acre parcels ($17/5 = 3.4$; rounds down to 3) and accommodate three dwelling units.
- F. For each zoning designation calculate the development potential of all partially vacant parcels (PVP) by dividing the parcel area by the minimum lot size, rounding down and subtracting one to account for the existing dwelling unit. For example a 17 acre parcel in the rural zone with an existing home on it could be divided into three five acre parcels and two additional homes could be constructed on the resulting parcels. [$(17/5 = 3.4) - 1 = 2.4$; rounds down to 2].
- G. For each zoning designation determine the total development potential (TDP) by adding the results from the VP and PVP steps. This step allows the total build-out capacity for each, non-RAID, rural zoning designation to be determined (in dwelling units).
- H. As a final step, add the resulting TDP figures for each zoning designation together to determine the total development potential for areas outside of RAIDs and UGAs. This step will allow the total build-out capacity of the rural area (excluding RAIDs) to be determined (in number of dwelling units).
- I. The dwelling unit totals from the previous steps can be multiplied by the average household size for Island County. The average household size should be determined using the most recent census data available. For the 2016 analysis, this average was 2.36.

B-5.4.2 Determining Capacity of Non-Residential RAID Zones

- A. For each non-residential RAID zoning designation identify all vacant parcels (VP). Once all of the vacant parcels have been identified, calculate the total combined acreage of these parcels. The resulting number is the non-residential development potential of all vacant parcels (in acres) for each non-residential RAID zoning designation.
- B. For each non-residential RAID zoning designation identify all re-developable parcels (RP). A parcel should be considered re-developable if the parcel data indicates that the improvement value to land value ratio is less than 1:2. Once all of the re-developable parcels have been identified, calculate the total combined acreage of these parcels. The resulting number is the non-residential

B Population Growth > Buildable Lands Analysis

development potential of all re-developable parcels (in acres) for each non-residential RAID zoning designation. As a final step, deduct 50% in order to account for the re-development factor.

- C. For each non-residential RAID zoning designation determine the total development potential (TDP) by adding the results of steps one and two together. Next determine the amount of land needed for public purposes and deduct an appropriate amount of land. Finally apply the critical area constraint factor and deduct an appropriate amount of land. This step allows the total net capacity for each non-residential RAID zoning designation to be determined (in acres).
- D. Add the resulting TNC figures for each non-residential RAID zoning designation together to determine the total development potential for all non-residential RAID zones. This step will allow the total combined build-out capacity of non-residential RAID zones to be determined (in acres).

B-5.5 UGA ANALYSIS STEPS:

B-5.5.1 General Steps

- A. Sort parcels by zoning or comprehensive plan designation using Assessor's parcel data and/or any other applicable information.
- B. For each UGA, identify all the undevelopable parcels in each zoning designation. Undevelopable parcels should include land which is tax exempt (parks, schools, churches and public facilities). These parcels should be excluded from further analysis.
- C. For each UGA, compile all available critical area mapping information and merge these layers into a single layer to determine the total quantity of constrained acreage in each zoning designation. Calculate the percentage of land area within each UGA that is constrained by critical areas by comparing number of acres constrained by critical areas to the total number of acres in each UGA. This calculation will result in a critical area constraint factor for each UGA.
- D. Based on available zoning or comprehensive plan information, sort all parcels into four groups as follows: (a) parcels zoned for single family home development (freestanding homes, townhomes, or other forms of individual lot development); (b) parcels zoned for multifamily development (apartments, condominiums, mobile home parks, and other forms of multi-unit per parcel development); (c) commercial and mixed use zones; and (d) industrial zones. Each of these groups should then be analyzed separately as described below.

B-5.5.2 UGA Capacity - Single Family Zones

- A. For each single-family zoning designation calculate the development potential of all vacant parcels (VP). The development potential of vacant parcels is determined by dividing the parcel area by the minimum lot size allowed in the zone and rounding down. When Planning Policies or Development Regulations specify both a minimum and maximum density, both should be calculated to produce a range.
- B. For each single-family zoning designation calculate the development potential of all partially vacant parcels (PVP). For purposes of this analysis, a partially vacant parcel is a parcel that is at least two times as large as the minimum lot size allowed by the zone. Calculate the development potential of all partially vacant parcels (PVP) by dividing the parcel area by the minimum lot size allowed

in the zone and rounding down and subtracting one in order to account for the existing dwelling unit. When Planning Policies or Development Regulations specify both a minimum and maximum density, both should be calculated to produce a range. Additionally, identify all the parcels that fall within 2 and 3.5 times the minimum lot size; discount a portion of these based on the sliding scale below to account for parcels which are physically large enough to be subdivided, but which cannot be subdivided because of the placement of the existing housing unit on the parcel.

Table B-7. Discount Factors for Partially Vacant Parcels

Criteria	Discount Factor
2-2.5 times the minimum lot size	75%
2.6-3 times the minimum lot size	50%
3.1-3.5 times the minimum lot size	25%
> 3.5 time the minimum lot size	0%

- C. For each single-family zoning designation determine the total development potential (TDP) by adding the results of steps one and two together. Next determine the amount of land needed for public purposes and deduct an appropriate amount of land. Finally, apply the critical area constraint factor for the UGA and deduct an appropriate amount of land. This step allows the total net capacity for each single-family zoning designation in the UGA to be determined (in dwelling units).
- D. Add the resulting TNC figures for each residential single-family zoning designation in the UGA together to determine the total development potential for all single-family zones in the UGA. The result of this step will be the total combined capacity of all single-family zones in the UGA (in number dwelling units).
- E. In order to determine the number of people that can be accommodated in the UGA's single-family zones the dwelling unit totals from steps three or four can be multiplied by the average household size for Island County. The average household size should be determined using the most recent census data available.

B-5.5.3 UGA Capacity – Multi-Family Zones

- A. Identify all vacant parcels zoned for multi-family residential development. Determine the development potential of these parcels by multiplying the acreage of the parcels by the density permitted in the zone. For zones with both a minimum and a maximum density, calculate the development potential at both the minimum allowed density and the maximum permitted density.
- B. For all areas designated for multi-family residential identify the parcels which can be redeveloped. In order to be re-developable, a parcel should have an improvement to land value ratio of less than 1:2. Determine the development potential of these parcels by multiplying the acreage of the parcels by the density permitted in the zone. As a final step, deduct 50% in order to account for

B Population Growth > Buildable Lands Analysis

- the redevelopment factor. For zones with both a minimum and a maximum density, calculate the development potential at both the minimum allowed density and the maximum permitted density.
- C. For each multi-family zoning designation determine the total development potential (TDP) by adding the results of steps one and two together. Next determine the amount of land needed for public purposes and deduct an appropriate amount of land. Finally, apply the critical area constraint factor for the UGA and deduct an appropriate amount of land. This step allows the total net capacity for each single-family zoning designation in the UGA to be determined (in dwelling units).
 - D. Add the resulting TNC figures for each multi-family residential zoning designation in the UGA together to determine the total development potential for all multi-family zones in the UGA. The result of this step will be the total combined capacity of all multi-family zones in the UGA (in number dwelling units).
 - E. In order to determine the number of people that can be accommodated in the UGA's multi-family zones, the dwelling unit totals from steps three or four can be multiplied by the average household size for Island County. The average household size should be determined using the most recent census data available.

B-5.5.4 UGA Capacity – Commercial & Mixed Use Zones

- A. For each commercial or mixed use UGA zoning designation identify all vacant parcels (VP). Once all of the vacant parcels have been identified, calculate the total combined acreage of these parcels. The resulting number is the commercial and mixed used development potential of all vacant parcels (in acres) for each non-residential commercial and mixed use zoning designation.
- B. For each commercial or mixed use UGA designation identify all re-developable parcels (RP). A parcel should be considered re-developable if the parcel data indicates that the improvement value to land value ratio is less than 1:2. Once all of the re-developable parcels have been identified, calculate the total combined acreage of these parcels. As a final step, deduct 50% in order to account for the redevelopment factor. The result, is the development potential of all re-developable parcels (in acres) for each commercial or mixed use UGA zoning designation.
- C. For each commercial or mixed use UGA zoning designation determine the total development potential (TDP) by adding the results of steps one and two together. Next determine the amount of land needed for public purposes and deduct an appropriate amount of land. Finally apply the critical area constraint factor and deduct an appropriate amount of land. This step allows the total net capacity for each commercial or mixed use UGA zoning designation to be determined (in acres).
- D. Add the resulting TNC figures for each commercial or mixed use UGA zoning designation together to determine the total development potential for all commercial or mixed use UGA zones. This step will allow the total combined build-out capacity of commercial or mixed use UGA zones to be determined (in acres).
- E. In order to determine the number of jobs which can be accommodated in commercial or mixed use UGA, the acreage totals from steps three or four can be multiplied by the average commercial employment density.

B-5.5.5 UGA Capacity – Industrial Zones

- A. For each industrial UGA zoning designation identify all vacant parcels (VP). Once all of the vacant parcels have been identified, calculate the total combined acreage of these parcels. The resulting number is the development potential of all vacant parcels (in acres) for each industrial UGA zoning designation.
- B. For each industrial UGA designation identify all re-developable parcels (RP). A parcel should be considered re-developable if the parcel data indicates that the improvement value to land value ratio is less than 1:2. Once all of the re-developable parcels have been identified, calculate the total combined acreage of these parcels. As a final step, deduct 50% in order to account for the redevelopment factor. The result is the development potential of all re-developable parcels (in acres) for each industrial UGA zoning designation.
- C. For each industrial UGA zoning designation determine the total development potential (TDP) by adding the results of steps one and two together. Next determine the amount of land needed for public purposes and deduct an appropriate amount of land. Finally apply the critical area constraint factor and deduct an appropriate amount of land. This step allows the total net capacity for each industrial UGA zoning designation to be determined (in acres).
- D. Add the resulting TNC figures for each industrial UGA zoning designation together to determine the total development potential for all industrial UGA zones. This step will allow the total combined build-out capacity of industrial UGA zones to be determined (in acres).
- E. In order to determine the number of jobs which can be accommodated in commercial or mixed use UGA, the acreage totals from steps three or four can be multiplied by the average industrial employment density.

B-5.5.6 Assumptions

The Washington State Department of Commerce provides guidance on conducting a land capacity analysis; however, local governments are given a degree of discretion in terms of assumptions used for the analysis. Island County reviewed material from other jurisdictions in the Puget Sound and Oregon; as well as guidance materials from the Department of Commerce. After considering local conditions, Island County used the following assumptions to perform the analysis:

Vacant Land or Vacant Parcel (VP):

- Parcels which do not contain a structure or which have improvement values of less than \$4,000 are considered vacant. Improvement values between \$4,000 and \$10,000 are considered vacant based on the Island County Assessor’s Office Land Use Codes. Parcels with a mobile or manufactured home were not considered vacant, regardless of the improvement value.
- Rationale: A structure worth less than \$4,000 is not likely a habitable structure and, for the purpose of this analysis, does not represent a dwelling unit or active commercial/industrial structure. According to the Island County Assessor’s office, an improvement value of less than \$4,000 generally represents a septic system, well, or other minimal improvement on the parcel.

B Population Growth > Buildable Lands Analysis

Partially Vacant Parcel (PVP):

- A parcel that is at least 2 times the minimum lot size and not entirely within the flood plain is considered partially vacant.
- Rationale: If a lot is at least twice the minimum lot size, it could be subdivided to form 2 or more lots; provided that the division does not result in a lot entirely constrained by critical areas.

Critical Areas:

- The Island County critical areas layers were joined into one layer, and for each UGA, the total acres in critical areas were divided by the total acres in the UGA. The resulting percentage is shown in Table 6.16 and was subtracted from the vacant and re-developable acres identified.

Table B-8. Percent of Total Acres in Critical Areas

UGA	% of Total Acres in Critical Areas
Oak Harbor	16%
Coupeville	39%
Langley	13%
Freeland	16%

B-5.5.7 Land needed for Public Purposes

Island County applied a factor of 15% to the land needed for housing and employment to represent for land needed for public purposes in RAIDs and UGAs (includes streets and utilities).

Household Size: 2.36 persons per household

- Based on the US Census Bureau’s 2010-2012 American Community Survey data
- Redevelopment of commercial, industrial, and high-density residential zoned land.
- Assume that 50% of the properties with an improvement to land value of less than 50% are likely to redevelop in the planning period.

Commercial Employment Density: 17 employees/acre

- An analysis of data obtained from the Employment Security Department of Washington State revealed an average employment density of 17 employees / acre, excluding public employers, school districts and Whidbey General Hospital. Additionally, Freeland was excluded from the average due to the lack of available sewer. It is assumed that employment density in Freeland will become closer to the other municipalities with the addition of sewer over the planning period.

Table B-9. Employees per acre in Island County UGAs

UGA	Employees	Acres	Employees/Acre
Oak Harbor	4,126	250	17
Langley	269	15	18
Freeland	527	49	11
Coupeville	560	35	16

Industrial Employment Density: 8 employees/acre

- Island County has a limited amount of industrial employment from which to develop an average density. The density varies greatly from business to business and without a larger sample size, outliers have a substantial influence on the average. As a result, the rounded average of the assumptions of the three jurisdictions identified in Table 6.18 was used.

Table B-10. Comparison of Employment Density Assumptions from Other Jurisdictions

County	Ratio
Skagit	Commercial: 20 employees/site acre Industrial: 6.5 employees/site acre
Clark	Commercial: 20 jobs/acre Industrial: 9 jobs/acre (Note: From 2000 to 2005, new permits show employees per net acre for commercial at 7.9 employees per acre and industrial 8.2 employees per net acre)
Pierce	Manufacturing/Warehousing: 8.2 employees per acre Commercial/Services: 19.37 employees per site acre (Unincorporated Pierce County 2014 buildable lands report)

B-5.5.8 Findings

The results of the Island County Buildable Lands Analysis were compared to the estimated 2036 population growth and allocations. Additionally, the results from the 2036 employment estimates and allocations from Skagit Council of Governments and BERK consulting were used as a comparison for future job growth. The results of this analysis are reported first by Planning Areas and then Urban Growth Areas.

B Population Growth > Buildable Lands Analysis

Table B-11. Island County Vacant Parcels by Zoning Designations in the Rural Areas

Zone	Acres			Parcels		
	Total	Vacant*	% Acres Vacant	Total	Vacant*	% Parcels Vacant
Rural	76,314	21,388	28%	23,809	6,435	27%
Rural Residential (RAIDs)	8,519	2,202	26%	14,894	3,511	24%
Commercial Agriculture	4,200	268	6%	197	26	13%
Rural Agriculture	6,603	472	7%	431	42	10%
Rural Forest	13,394	4,708	35%	802	236	29%
Airport	295	62	21%	40	7	18%
Light Manufacturing	127	20	16%	30	7	23%
Commercial RAIDs	477	168	35%	331	105	32%

Table B-12. Summary of Buildable Lands Analysis, Towns & Cities

Buildable Lands Analysis, Towns & Cities	Initial Result - Developable Acres		Subtract Critical Area ¹	Subtract Land for Public Purposes ²	Population Growth Capacity ³	Jobs
Oak Harbor						
Residential (Avg. Density)	2,780	<i>Dwelling Units</i>	2,335	1,985	4,685	N/A
Commercial	166.0	<i>Acres</i>	139.4	118.5	N/A	2014
Industrial	147.6	<i>Acres</i>	124.0	105.4	N/A	843
Housing			Employment			
Total Capacity		1,985	Total Capacity		2,857	
Estimate 20-Year Need		1,588	Estimated 20-Yr Need (Non-Military)		167	
Urban Residential Reserve		397	Employment Reserve		2,690	
<p><small>1. Determined based on the percentage of acres in critical areas (Langley 13%, Coupeville 39% & Oak Harbor 16%)</small></p> <p><small>2. Assumption of 15%</small></p> <p><small>3. Island County averages 2.36 persons per housing unit</small></p>						

Population Growth > Buildable Lands Analysis

B

Buildable Lands Analysis, Towns & Cities	Initial Result - Developable Acres		Subtract Critical Area¹	Subtract Land for Public Purposes²	Population Growth Capacity³	Jobs
Coupeville						
Residential	575	<i>Dwelling Units</i>	351	298	703	N/A
Commercial	9.9	<i>Acres</i>	6.1	5.2	N/A	88
Housing			Employment			
Total Capacity		298	Total Capacity			88
Estimate 20-Year Need		61	Estimated 20-Yr Need (Non-Military)			162
Urban Residential Reserve		237	Employment Reserve			-74
Langley						
Residential	1,216	<i>Dwelling Units</i>	1,058	899	2122	N/A
Commercial	8.6	<i>Acres</i>	7.5	6.4	N/A	108
Housing			Employment			
Total Capacity		899	Total Capacity			108
Estimate 20-Year Need		39	Estimated 20-Yr Need (Non-Military)			52
Urban Residential Reserve		860	Employment Reserve			56
<p>1. Determined based on the percentage of acres in critical areas (Langley 13%, Coupeville 39% & Oak Harbor 16%)</p> <p>2. Assumption of 15%</p> <p>3. Island County averages 2.36 persons per housing unit</p>						

Rural Areas and Rural Areas of Intense Development (RAIDs)

- The Growth Management Act directs the County to ensure that there is adequate land within the UGAs to accommodate estimated population and job growth. The County does not have this obligation in rural areas. Consequently, the rural land analysis is a build out scenario to inform land use policies and better understand the environmental impacts associated with rural population growth and rural land use designations.

B Population Growth > Buildable Lands Analysis

B-5.6 RURAL AREAS

For planning purposes, Island County has historically been described and studied in terms of four planning areas: North Whidbey, Central Whidbey, South Whidbey, and Camano Island (see Figure C-2, above). The non-UGA results are broken down into these areas in order to understand what portions of the County have substantial development potential.

B-5.6.1 North Whidbey Planning Area

Based on the assumptions made in the buildable land analysis, the rural North Whidbey planning area, including Rural Areas of Intense Development (RAIDs), can accommodate approximately 2,204 additional residents based on current zoning regulations. This capacity does not include the Oak Harbor UGA, which was analyzed separately.

- The Regional Allocation for the North Whidbey Planning Area is 6,245.
- 60% of that growth is expected to occur within Oak Harbor (see section B-5.7.1) while the remaining 40% (2,498) is expected in the Rural areas.
- Deficit housing units will be accommodated by shifting additional growth to the Oak Harbor UGA and other planning areas, which have excess capacity to accommodate this deficit.

Table B-13. North Whidbey Planning Area, Buildable Lands Analysis - Rural Growth 2010 - 2036

Total Population	2010	2,036	Growth Rate
Rural (North)	36,750	39,248	7% 0.3% annually

Table B-14. North Whidbey Planning Area, Buildable Lands Analysis - Rural Land Capacity

2036 Land Capacity	Housing Capacity (Housing Units)	Estimated 20-Yr Housing Units Need	Residential Reserve
Rural (North)	848	1,058	(211)

B-5.6.2 Central Whidbey Planning Area

Based on the assumptions made in the buildable land analysis, the rural Central Whidbey planning area, including RAIDs, can accommodate approximately 4,189 additional residents based on current zoning regulations. This capacity does not include the Coupeville UGA, which was analyzed separately.

- The Regional Allocation for the Central Whidbey Planning Area is 963.

Population Growth > Buildable Lands Analysis

B

- 15% of that growth is expected to occur within the Town of Coupeville (see section B-5.7. 2) while the remaining 85% (819) is expected in the Rural areas.

Table B-15. Central Whidbey Planning Area, Buildable Lands Analysis - Rural Growth (2010 - 2036)

Total Population	2010	2,036	Growth Rate
Rural (Central)	10,520	11,339	8% 0.3% annually

Table B-16. Central Whidbey Planning Area, Buildable Lands Analysis - Rural Land Capacity

2036 Land Capacity	Housing Capacity (Housing Units)	Estimated 20-Yr Housing Units Need	Residential Reserve
Rural (Central)	1,775	347	1,428

B-5.6.3 South Whidbey Planning Area

Based on the assumptions made in the buildable land analysis, the rural South Whidbey Planning Area can accommodate approximately 5,440 additional residents based on current zoning regulations. This capacity does not include the Langley and Freeland UGAs, which were analyzed separately.

- The Regional Allocation of population growth for the South Whidbey Planning Area is 1,239.
- 7% of that growth is expected to occur within the City of Langley (see section B-5.7.3 & B-6.2) and a minimum of 12% within Freeland (see section B-5.7.4 & B-6.3) while the remaining 81% (1,004) is expected in the Rural areas.

Table B-17. South Whidbey Planning Area, Buildable Lands Analysis - Rural Growth (2010 - 2036)

Total Population	2010	2,036	Growth Rate
Rural (South)	15,560	16,564	6% 0.2% annually

Table B-18. South Whidbey Planning Area, Buildable Lands Analysis - Rural Land Capacity

2036 Land Capacity	Housing Capacity (Housing Units)	Estimated 20-Yr Housing Units Need	Residential Reserve
Rural (South)	2,145	425	1,720

B Population Growth > Buildable Lands Analysis

The 2016 update includes the transition of properties within the Freeland NMUGA from rural to urban zoning and the installation of sewer. This change, from rural to urban, is anticipated to have an impact on the percentage of growth that will occur within Freeland. The specific impact and rate of transition will be impacted by several factors, including market influences and rate of sewer installation. Due to the many unknowns, the allocations for Freeland are still based on historical (rural) growth rates. In the next periodic update the growth allocation methodology will have to be revisited once data is available, but known market factors were considered in this update related to the NMUGA Resizing (See Section B-6.3).

B-5.6.4 Camano Island Planning Area

The Camano Island planning area encompasses the entire island which has no UGAs; therefore, the analysis consists entirely of the rural areas and RAIDs. Based on the assumptions made in the buildable lands analysis, Camano Island has enough land to accommodate approximately 3,193 additional residents based on current zoning regulations.

- The Regional Allocation for the Camano Island Planning Area is 963.
- There are no Urban Growth Areas within this Planning Area, so all the growth is in Rural areas

Table B-19. Camano Island, Buildable Lands Analysis - Growth (2010 - 2036)

Total Population	2010	2,036	Growth Rate
Camano Island	15,660	16,623	6% 0.2% annually

Table B-20. Camano Island, Buildable Lands Analysis - Land Capacity

2036 Land Capacity	Housing Capacity (Housing Units)	Estimated 20-Yr Housing Units Need	Residential Reserve
Camano Island	1,353	408	945

B-5.7 URBAN GROWTH AREAS

Note: Urban Growth Areas are identified and mapped in Chapter 1, Land Use.

B-5.7.1 City of Oak Harbor

The City of Oak Harbor zoning code states both a minimum and maximum density is allowed in each residential zoning designation. This produced a wide range in for the results. In order to narrow these results, the Oak Harbor Planning Department provided the gross densities achieved by developments since 2000. This provided the estimated net density achieved by the developments. The average net densities achieved are identified in Table C-25.

Table B-21. Oak Harbor Average Net Densities

Land Use (Zone)	Units	Net Acreage	Net Units/Acre
Low Density	750	138.58	5.41
Medium	461	62.92	7.33
Medium High	69	10.09	6.84
High	120	7.76	15.46

The BLA indicates that there will be adequate land within the current Urban Growth Areas to accommodate the projected population increase.

- The Regional Allocation for the North Whidbey Planning Area is 6,245.
- 60% of that growth is expected to occur within Oak Harbor (3,747).
- Includes 1,000 new positions at the Whidbey Naval Air Station. This represents a total of 2,530 persons (at 2.53 persons per household), or 68% of the growth projected for Oak Harbor.
- Vacant land includes 363 parcels zoned for single family residential.
- Oak Harbor has the capacity to accept a rural-to-urban shift (requires joint planning).

Table B-22. Oak Harbor UGA, Buildable Lands Analysis - Growth (2010 - 2036)

Total Population	2010	2,036	Growth Rate
City of Oak Harbor	22,075	25,822	17% 0.6% annually

Table B-23. Oak Harbor UGA, Buildable Lands Analysis - Residential Land Capacity

2036 Land Capacity	Housing Capacity (Housing Units)	Estimated 20-Yr Units Need	Urban Residential Reserve
Low	1,016	1,588	(572)
Average Density	1,985	1,588	397
High	2,490	1,588	903

The Buildable Lands Analysis indicates that the UGA has adequate land available for the projected increase in employment.

- The North Whidbey Regional Allocation for non-military job growth is 398.
- 42% of that growth is projected to occur within Oak Harbor, or 167 jobs.

B Population Growth > Buildable Lands Analysis

Table B-24. Oak Harbor UGA, Buildable Lands Analysis - Employment Land Capacity

2036 Land Capacity	Employment Capacity (Jobs)	Estimated Employment Increase	Employment Reserve
Oak Harbor	2,857	167	2,690

B-5.7.2 Town of Coupeville

Based on the assumptions made in the analysis, the Town of Coupeville has adequate land available for the estimated increase in population.

- The Regional Allocation for the Central Whidbey Planning Area is 963.
- 15% of that growth is expected to occur within the Town of Coupeville (144).
- Vacant land includes 128 parcels zoned for single family residential.
- Coupeville has the capacity to accept a rural-to-urban shift (requires joint planning).

Table B-25. Coupeville UGA, Buildable Lands Analysis - Growth (2010 - 2036)

Total Population	2010	2,036	Growth Rate
Town of Coupeville	1,831	1,975	8% 0.3% annually

Table B-26. Coupeville UGA, Buildable Lands Analysis - Land Capacity

2036 Land Capacity	Housing Capacity (Housing Units)	Estimated 20-Yr Housing Units Need	Urban Residential Reserve
Town of Coupeville	298	61	237

The analysis identified an insufficient amount of land is available for the projected increase in employment.

- The Central Whidbey Regional Allocation for job growth is 246.
- 66% of that growth is projected to occur within the Town of Coupeville (162).

Table B-27. Coupeville UGA, Buildable Lands Analysis - Employment Land Capacity

2036 Land Capacity	Employment Capacity (Jobs)	Estimated Employment Increase	Employment Reserve
Town of Coupeville	88	162	(74)

The Town of Coupeville has a variety of options available to address this shortfall of commercial land. Based on its status as a UGA within a National Historic Preserve, the Town is not required to expand to increase capacity. One option might be to rezone excess residential parcels to commercial as the need arises. Expansion of Island County employment (the main County campus is in Coupeville) will also address this need using existing facilities and planned facility capacity expansions.

B-5.7.3 City of Langley

Based on the analysis, the Langley UGA has adequate land available for the estimated increase in population.

- The Regional Allocation for the South Whidbey Planning Area is 1,239.
- 7% of that growth is expected to occur within Langley (92).
- Vacant land includes 94 parcels zoned for single family residential. If subdivided to current zoning densities, these 94 parcels could create 504 parcels.
- The Buildable Lands Analysis concluded that the Langley UGA was oversized and required a boundary adjustment.
- Langley has the capacity to accept a rural-to-urban shift (requires joint planning).

Table B-28. Langley UGA, Buildable Lands Analysis - Growth (2010 - 2036)

Total Population	2010	2,036	Growth Rate
City of Langley	1,035	1,127	9% 0.3% annually

Table B-29. Langley UGA, Buildable Lands Analysis - Land Capacity (Before Resizing)

2036 Land Capacity	Housing Capacity (Housing Units)	Estimated 20-Yr Housing Units Need	Urban Residential Reserve
City of Langley	899	39	860

B Population Growth > 2016 UGA Boundary Adjustments

B-5.7.4 Freeland Non-Municipal UGA

Based on the land capacity analysis, the Freeland NMUGA has adequate land to accommodate both the estimated population and employment increase. For study purposes, Island County analyzed both the NMUGA boundary as adopted prior to the 2016 Comprehensive Plan update and the NMUGA revised in the 2016 Comprehensive Plan update. This analysis used the zoning defined in the Freeland Subarea Plan. Both studies indicated that adequate land was available.

- The Regional Allocation for the South Whidbey Planning Area is 1,239.
- A minimum of 12% of that growth is expected to occur within Freeland (144).
- Vacant land includes 66 parcels zoned for single family residential.
- Freeland has the capacity to accept a rural-to-urban shift (see Section 1.4.1.1.3)

Table B-30. Freeland NMUGA, Buildable Lands Analysis - Growth (2010 - 2036)

Total Population	2010	2,036	Growth Rate
Freeland	514	658	28% 1.0% annually

Table B-31. Freeland NMUGA, Buildable Lands Analysis - Land Capacity Before Resizing

2036 Land Capacity	Housing Capacity (Housing Units)	Estimated 20-Yr Housing Units Need	Urban Residential Reserve
Freeland	850	61	789

The Buildable Lands Analysis concluded that the Freeland NMUGA was oversized and required a boundary adjustment.

B-6 2016 UGA BOUNDARY ADJUSTMENTS

B-6.1 EVALUATING UGA BOUNDARIES

Urban Growth Areas must be adequately sized to accommodate urban population and employment growth projected for the next 20 years, and cannot be larger than necessary to accommodate this population.

The County conducted an evaluation of the capacity of its Urban Growth Areas as a part of the Comprehensive Plan Update. In the case of both the City of Langley and Freeland’s UGAs, they were determined to be oversized and required a boundary adjustment to reduce the size.

Population Growth > 2016 UGA Boundary Adjustments

B

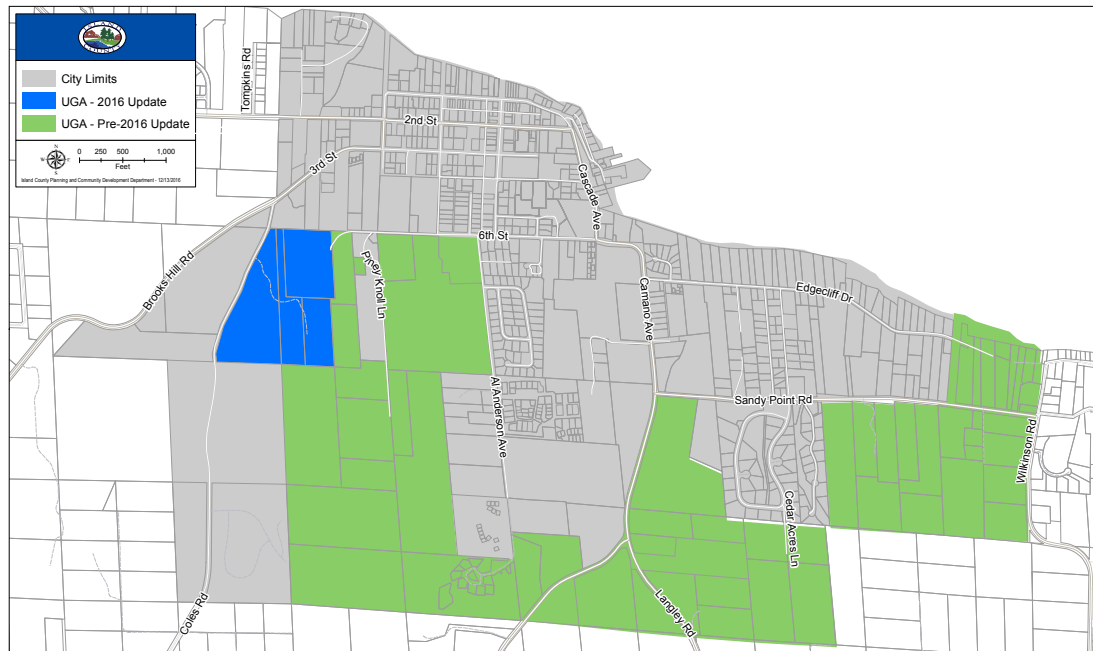
B-6.2 LANGLEY UGA RESIZING

A number of public meetings were held to discuss the UGA resizing options. The City of Langley supported redrawing the UGA to the city limits. A few parcels outside the city limits are included within the proposed boundary due to existing water and sewer availability to the parcels (see Map B1).

Table B-32. Langley UGA Buildable Lands Analysis Summary, Before & After Resizing

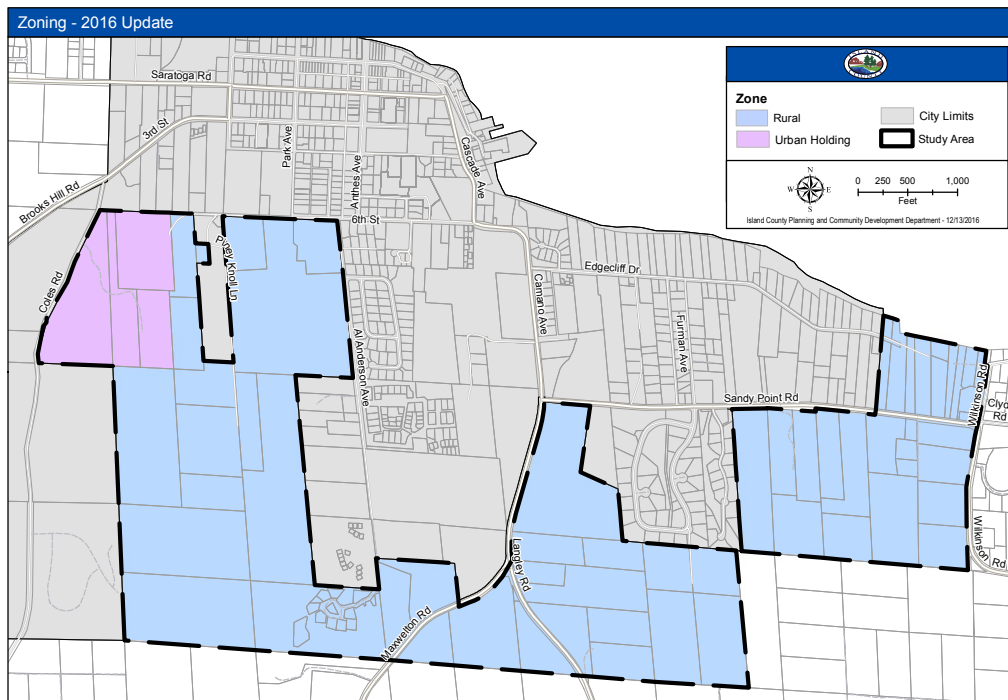
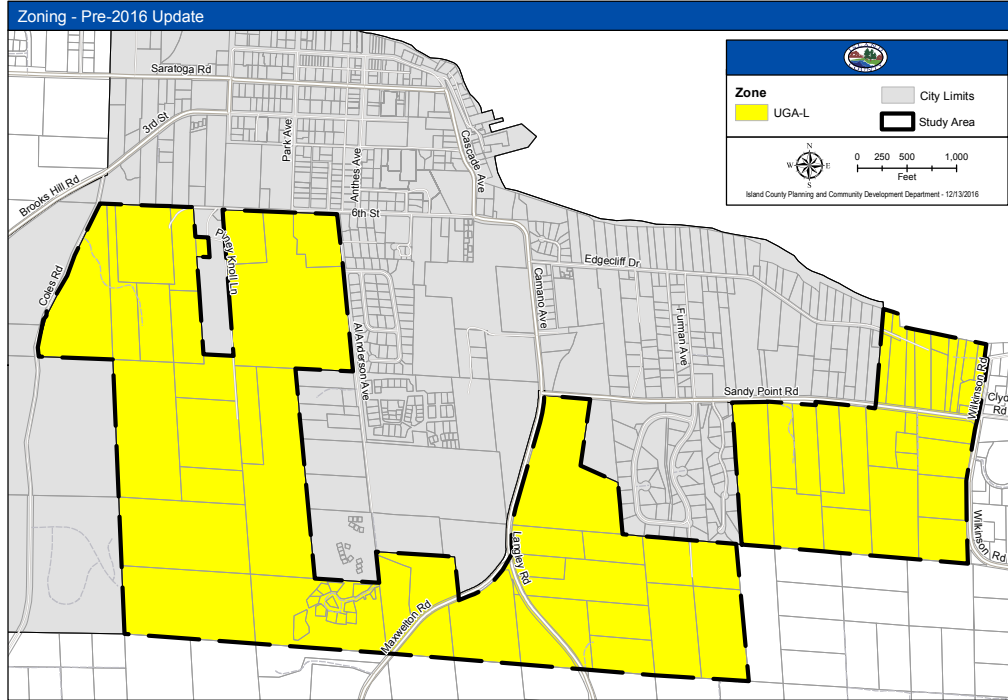
2036 Land Capacity	Housing Capacity (Housing Units)	Estimated 20-Yr Housing Units Need*	Urban Residential Reserve
Previous UGA	1,625	39	1,586
2016 UGA	899	39	860
Difference			-726 -54.2%
	Employment Capacity (Jobs)	Estimated Employment Increase	Employment Reserve
Previous UGA	108	52	56
2016 UGA	108	52	56
Difference			0

MAP B1. Map of the 2016 Langley UGA Reduction



B Population Growth > 2016 UGA Boundary Adjustments

MAP B2. Langley Area Rezoning Related to UGA Resizing



This map is intended to be used as a GUIDE. Island County is providing this information as a general geographic representation that should not be used for precise measurements or calculations. Some of the features on this map are not accurately depicted. Any user of this map assumes all responsibility for use and agrees to hold Island County harmless for liability, damages, or loss incurred by use of this information. Specific questions should be directed to Island County's Department of Planning and Community Development.

Population Growth > 2016 UGA Boundary Adjustments

B

B-6.2.1 Rezoning related to UGA Reduction

Since the Langley UGA was reduced, Langley UGA zoning district no longer applies to those properties that are outside of the UGA boundary. Properties that were removed from the Langley UGA have been rezoned to Rural with this amendment (see Map B2). The UGA-Langley zoning is one dwelling unit per 5 acres, the same as the Rural zoning, so there is no impact on lot capacity.

B-6.2.1.1 Langley 2020 Option

The County has committed to a Langley 2020 Option as well. If a property owner requested to be rezoned into Rural Forest, Rural Agriculture or Commercial Agriculture before January 1, 2020, the County will process the rezoning free of charge. Rural Forest, Rural Agriculture and Commercial Agriculturally zoned land would automatically be given an overlay of Long Term Rural Significance under the new JPA overlay process (see Section 1.5.1.2.1).

B-6.3 FREELAND NMUGA RESIZING

The Freeland NMUGA (see map B3) was revised based on a multi-year planning effort with extensive public involvement, in a manner that strives to achieve a balance between:

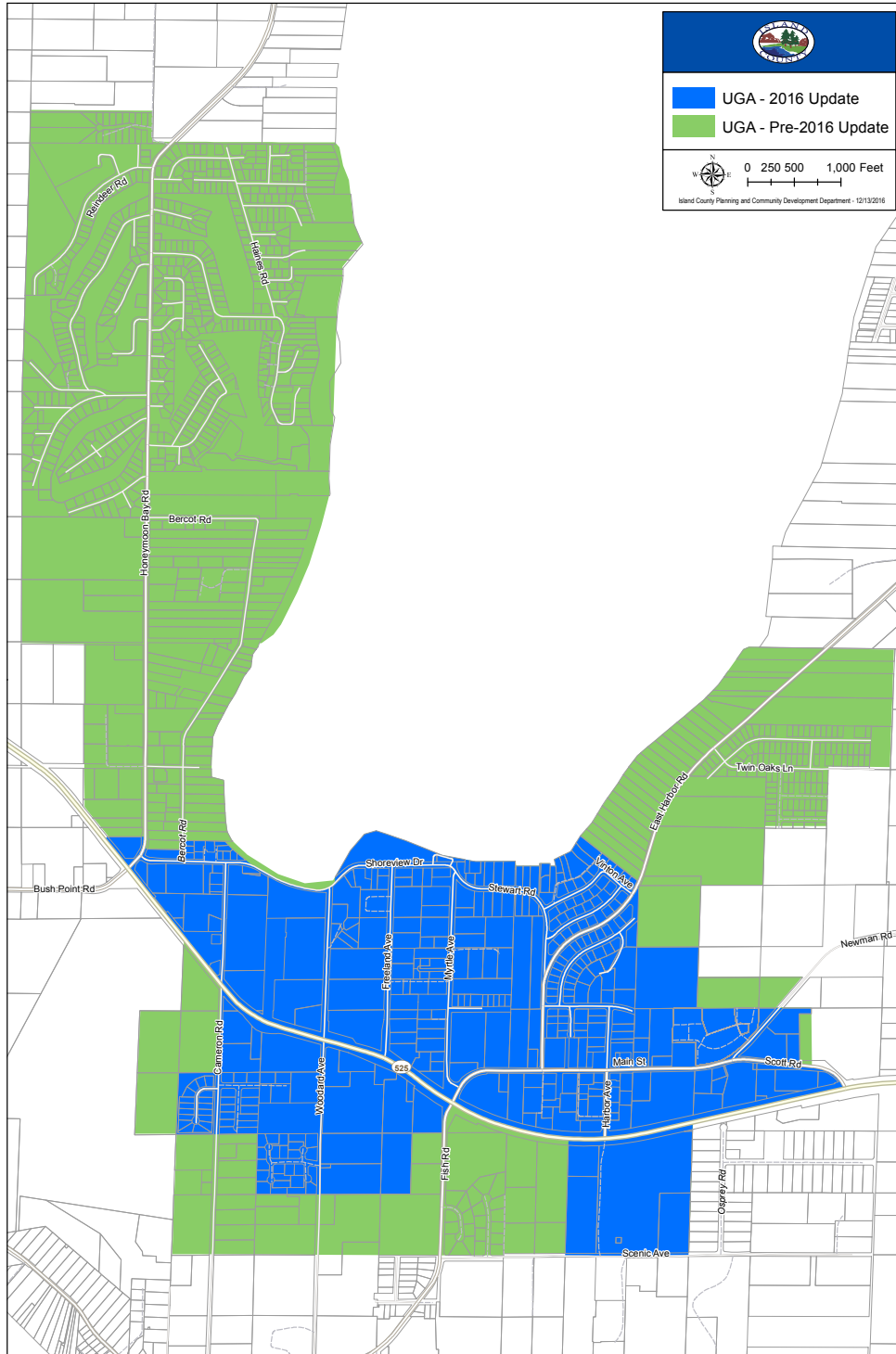
- The community’s request for the “smallest possible” size, and
- Feedback from Freeland Water & Sewer District on service areas, and
- The need to be large enough for urban services to be financially viable, and
- The desire to shift growth from rural to urban areas.

Table B-33. Freeland NMUGA Buildable Lands Analysis Summary, Before & After Resizing

2036 Land Capacity	Housing Capacity (Housing Units)	Estimated 20-Yr Housing Units Need*	Urban Residential Reserve
Previous UGA	850	61	789
2016 UGA	232	61	171
Difference			-618 -78.3%
	Employment Capacity (Jobs)	Estimated Employment Increase	Employment Reserve
Previous UGA	483	104	334
2016 UGA	425	104	322
Difference			-12 -0.04%

B Population Growth > 2016 UGA Boundary Adjustments

MAP B3. Map of the 2016 Freeland NMUGA Reduction



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Population Growth > 2016 UGA Boundary Adjustments

B

The Regional population allocation for the South Whidbey Planning Area is 1,239 (20 year projection). In preparing future projected population allocations, staff utilized historic growth trends. Based on past growth trends, the County estimates that a minimum of 12% of the population growth in the South Whidbey Planning Area will occur within the Freeland NMUGA (a minimum population increase of 144 at the most conservative estimate). However, the following factors will impact Freeland growth rates relative to the rest of the South Whidbey Planning Area.

- The installation of sanitary sewer services which will likely facilitate both residential and commercial growth (See 10A, Capital Facilities Plan, Section A.3.5.4.2, and the Freeland Subarea Plan), and
- The adoption of urban zoning development regulations allowing for more intensive residential development in the Freeland NMUGA, and
- The reduction of the NMUGA by approximately 78% resulting in less possibility for land subdivision and corresponding density in those areas no longer part of the NMUGA (see Table B-33), and
- A rezoning of rural lands immediately adjacent to the NMUGA that precludes the future creation of as many as 160 rural residential lots (see Section B-6.3.1).

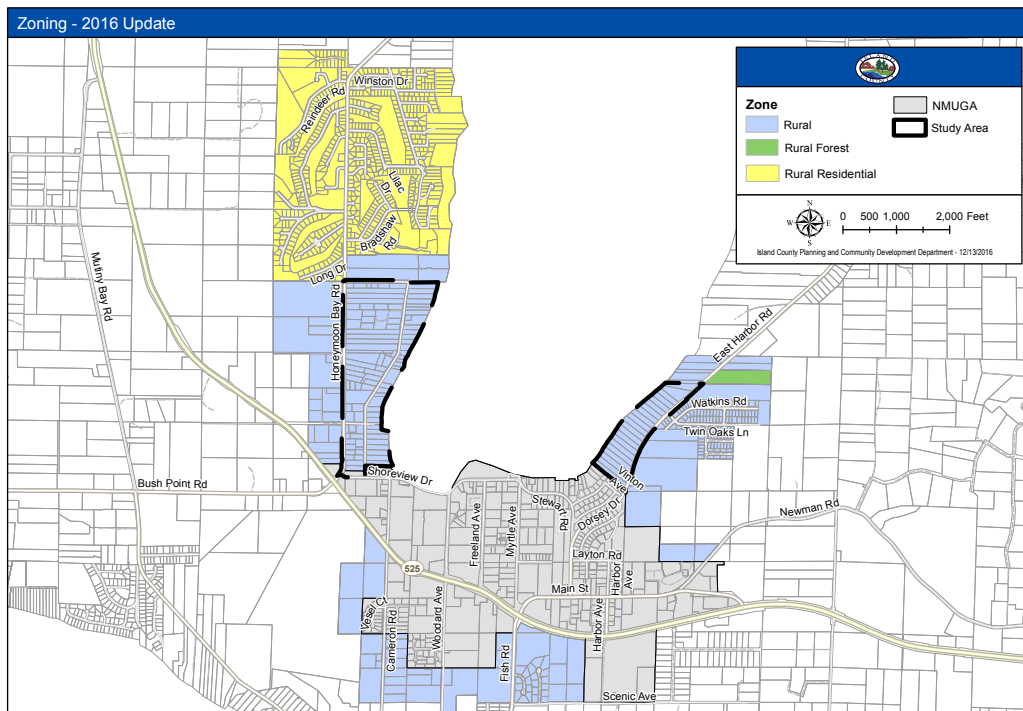
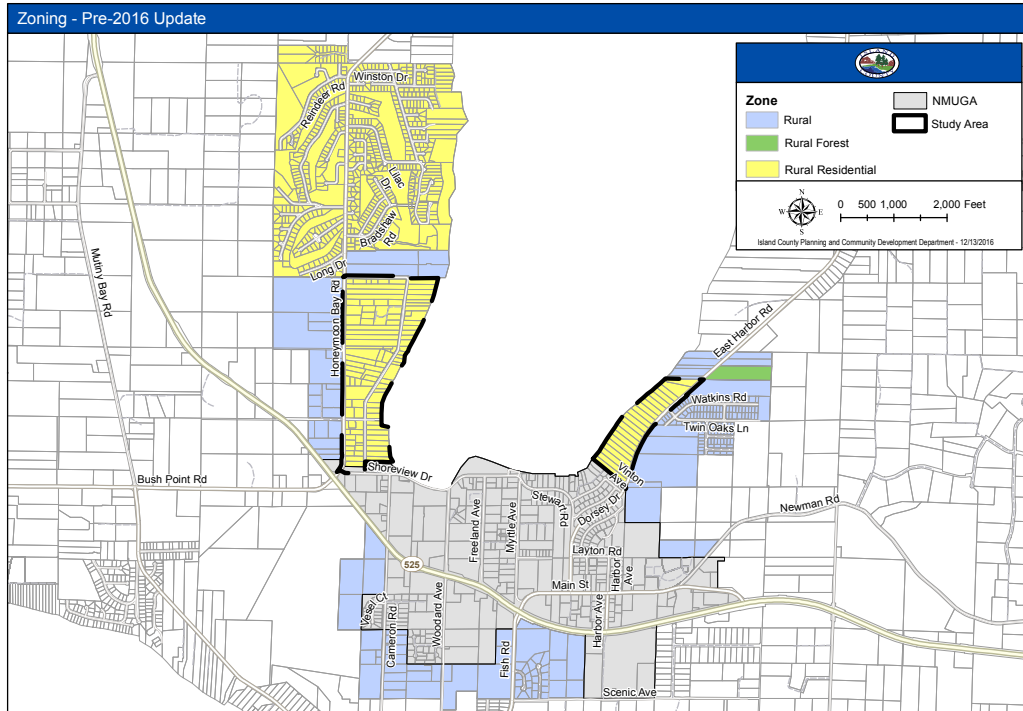
As a result, in Freeland, capacity for residential growth needs to be greater than the minimum to account for these factors, and to provide more flexibility and allow for new levels of growth and enhanced market options. This strategy is designed to help facilitate a population shift from the rural areas in Island County, particularly within South Whidbey, to the urbanized NMUGA of Freeland where new options for residential density are possible. These factors are equivalent to application of a market factor of approximately 33%. This market factor is tailored to this specific NMUGA to:

- Allow capacity for additional growth to occur within the Freeland NMUGA,
- To ensure adequate capacity to accommodate the anticipated increase in population created by the factors identified above,
- To incentivize growth within urbanized areas, and
- To address the key factors critical to this NMUGA's success.

A market factor of 33% represents a housing unit need of 234 units. The NMUGA as provided in the Comprehensive Plan, with a capacity of 232 units, can accommodate this anticipated increase and has been adequately sized. The approach will also help keep land prices at levels that can achieve these objectives. Island County has provided areas and densities sufficient to permit the urban growth that is anticipated to occur in the Freeland NMUGA for the succeeding twenty-year period, in accordance with RCW 36.70a.110(2).

B Population Growth > 2016 UGA Boundary Adjustments

MAP B4. Freeland Area Rezoning Related to NMUGA Resizing



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Population Growth > 2016 UGA Boundary Adjustments

B

Table B-34. Freeland NMUGA, Buildable Lands Analysis Summary - After Resizing

Buildable Lands Analysis	Initial Result - Developable Acreage		Subtract Critical Area ¹	Subtract Land for Public Purposes ²	Population Growth Capacity ³	Jobs
Residential	325	Dwelling Units	273	232	548	N/A
Commercial	37.2	Acres	31.2	26.6	N/A	451
Industrial	0.2	Acres	0.1	0.1	N/A	1
Housing Units			Employment			
Total Capacity		232	Total Capacity		452	
Estimate 20-Year Need		61	Estimated 20-Yr Need (Non-Military)		104	
Urban Residential Reserve		171	Employment Reserve		349	

1. Determined based on the percentage of acres in critical areas (16% in Freeland)

2. Assumption of 15%

3. Island County averages 2.36 persons per housing unit

B-6.3.1 Rezoning related to NMUGA reduction

Some properties within the previous Freeland NMUGA were zoned Rural Residential (RR), a remnant RAID zoning from before Freeland was an NMUGA. Since the size of Freeland's Non-Municipal Urban Growth Area (NMUGA) was being reduced, three areas with remnant RAID zoning now fell outside of the NMUGA.

Two of those three RR areas would have fallen adjacent to the NMUGA; however the Growth Management Act (GMA) states that RAIDs cannot be adjacent to UGAs and therefore the RAID zoning had to be removed. Those two areas were rezoned to Rural (R) (see Map B4). This rezoning precludes the future creation of as many as 160 rural residential lots.

Table B-35. Rezoning Related to NMUGA Resizing, Impacts on Rural Lot Capacity

RR Lots Rezoned to Rural	Lot Capacity Before Rezoning	Capacity Change
122	282	-160

The Holmes Harbor Golf & Yacht Club community is the third RR zoned area that was no longer within the UGA. As it would not have been adjacent to the reduced UGA boundary, the RAID will remain in place, so the zoning did not change for that area.

B Population Growth > 2016 UGA Boundary Adjustments

Island County will continue to monitor this dynamic area of state law, and evaluate impacts and opportunities as they impact our communities. Areas that have been rezoned will also be considered during future discussions related to the potential expansion of the NMUGA boundary, and may be considered as a logical area to be considered first for expansion if needed (see Section 1.5.1.2.2 and CWPPs 3.2.3)