

From: [Fred Klein](#)
To: [Colin Maycock](#)
Subject: Public Hearing December 10, 2024
Date: Sunday, November 24, 2024 9:35:13 AM
Attachments: [December 10, 2024.CC testimony in support of DR.pages.pdf](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Colin,

I submit the attached additional comments in support of Docket Request 24-0003.

Thank you for ensuring that Council members will receive copies prior to the hearing.

Fred

FRED KLEIN'S
Supplemental Comments
to
DOCKET REQUEST 24-0003
December 10, 2024

Good Morning...my name is Fred Klein, I live in Eastsound...I appreciate and thank you for the opportunity to offer comments to the San Juan County Council in support of my Docket Request #24-0003. I regret that I cannot appear before Council in person.

My Docket Request would add language to our Comprehensive Plan (CP) at SJCC 18.35.100.A.2. ...it involves buffers for *only* those wetlands which fall within Urban Growth Areas (UGAs).

There are two types of buffers...*water quality*, and *habitat*.

As you well know, one of the principal reasons San Juan County opted in to the Growth Management Act (GMA) is to reduce pressure for development in our rural landscape by increasing our ability to develop within our UGAs.

The existing CP includes a provision whereby the *water quality* buffers for wetlands **within UGAs** may be reduced by 50% subject to certain mitigations. Presumably this provision exists in order to allow for the more intensive development within UGAs envisioned by the GMA.

However...whatever community benefits this reduction in *water quality* buffers to wetlands in UGAs may be, they cannot be realized without a commensurate reduction in the *habitat* buffers ...a subject upon which our Comprehensive Plan, including the Critical Area Ordinance, is silent.

FRED KLEIN'S
Supplemental Comments
to
DOCKET REQUEST 24-0003
December 10, 2024

Thus...I come before you with my Docket Request which suggests specific language which would empower the Director of DCD to reduce habitat wetland buffers within Urban Growth Areas commensurate with the **existing** reductions for water quality buffers...I see this as a simple ask requiring nothing more than the stroke of a pen by the County Council.

There is...however...a problem.

In 2019, I made a similar request...and it was recommended to be part of a supposedly upcoming review of the Critical Area Ordinance (CAO)...something which has yet to happen.

Now, five years later, DCD has characterized my Docket Request as “obsolete” and redundant...and has once again recommended that it await a revision to the CAO...a review which I now understand will be undertaken in 2027, eight years after I first petitioned for a review of the change described in my Docket Request.

Justice delayed is justice denied.

I have a five acre parcel on Mt. Baker Road within the Eastsound UGA which Council has recently increased the allowable density from 4 to 12 homes per acre. Abutting the OPAL neighborhood of Wild Rose Meadow, it is a site ideally located for affordable housing.

FRED KLEIN'S
Supplemental Comments
to
DOCKET REQUEST 24-0003
December 10, 2024

The parcel is impacted by a small, isolated, Class II wetland which, *in itself* presents no problem to development of the site.

However, the 150 foot wetland *habitat* buffer so severely restricts the development potential that the site cannot sensibly be used to create affordable, workforce housing.

So...if you are serious about addressing the affordable housing shortfall...some would say crisis...please override the staff determination and schedule this Docket Request for review and action...*now!!*

I make this request as an architect and planner whose 40 year career has focused on affordable housing...I was a founding member and first board president of OPAL Community Land Trust, an office from which I resigned following my selection as architect for OPAL Commons.

Thank you for your time and attention,

Fred R. Klein