

Fred R. Klein's Comments  
on  
SJC Comprehensive Plan Update  
to  
SJC Planning Commission  
Public Hearing, July 15, 2022

Gentlepeople,

Over the years since its inception, I have participated in and commented on the CP Update during meetings of the SJC PC and the Eastsound Planning Review Committee; I served multiple terms as a member of the Committee although I am not a current member. I wish to make the following comments on the SJC 2036 Comprehensive Plan Update as it applies to Orcas Island and more specifically to the village of Eastsound including its Urban Growth Area.

1. I have specific concerns about the methodology employed by, the computed results, and the conclusions reached as a consequence of the Land Capacity Analysis. I believe the CP Update fails to comply with the requirements of RCW 36.70A.110(2) because the Land Capacity Analysis does not include areas and densities sufficient to permit the urban growth that is projected to occur in the county for the succeeding twenty year period. The Land Capacity Analysis is erroneous, flawed, fails to follow Department of Commerce guidance, WAC 365-196-325, miscalculates the market factor by ignoring local circumstances, substitutes an arbitrary factor in lieu of actual data concerning residential development characterized as Seasonal & Recreational Occupancy, and grossly under-represents nonresidential uses.

2. I have specific concerns about whether or not the CP Update complies with the requirements of RCW 36.70A.115 because the Plan Update, taken collectively with its Land Capacity Analysis and Housing Needs Analysis, does not provide sufficient capacity of land suitable for development on Orcas Island, particularly within the Eastsound UGA to accommodate the allocated housing growth in a manner consistent with projected residential and non-residential growth...and...in a manner consistent with SJC regulations enacted in response to WWGMHB concerns in order to achieve GMA compliance in the past.

3. I have specific concerns as to whether or not the CP Update is internally consistent, including consistency with its Vision Statement, and consistency with its implementing Development Regulations in accordance with the requirements of WAC 365-196-500(3) given that DCD is submitting this Update to SJCC which is solely supported by existing and not-updated DRs. As I read the Act, a GMA-compliant CP is dependent upon implementing regulations which carry out the goals and policies of the CP.

Cordially,

Fred R. Klein