

Kitsap County Department of Community Development
619 Division St., 2nd Floor
Port Orchard, WA 98366

January 21, 2026

RE: Draft Boundary Line Adjustment Code

To: Mr. Scott Diener, Planning Manager

In review of the Draft Boundary Line Adjustment Code, I note a couple areas that should be modified to improve the requirements and language. Ultimately, these modifications would benefit the current and future citizens of Kitsap County.

First, the main reason to change your existing code is to come into compliance with court orders relating to buildable areas here in Washington State. City of Seattle v. Crispin and Hollywood Hill Neighbors v. King County are Washington lawsuits that have created legal obligations for all counties in Washington State, including Kitsap County, all to deal with adequate buildable area.

That said, there should a second category, not identified, with the allowance for developed parcels to perform Boundary Line Adjustments. This would be where the buildable area is already occupied on both properties (supposedly by a single home or building upon each property), potentially even non-conforming parcels should be allowed to adjust their property boundary to: better fit with the topography, site access or existing structure locations. Just because their buildable area has already been filled, should not restrict those property owners from adjusting their boundaries. Notes or certifications could be added to ensure code compliance regarding existing buildable area, access or zoning, should anything ever change. But the citizens should not be restricted, strictly because the property they own is already developed.

For Boundary Line Adjustment requirements, it should be required that property corners be set. Property corners should be set at all angle points of any new boundary location created as part of a Boundary Line Adjustment. This will eliminate future questions of location by the land owners, their neighbors and future surveyors. By setting property corners, a surveyor will need to comply with RCW 58.09 & WAC 332-130, thereby leaving

publicly documented evidence of the new boundary's actual location. Not just a legal description, which does not mean anything to 95% of the population. A string line between property corners, makes it hard for anyone to argue about the boundary line location.

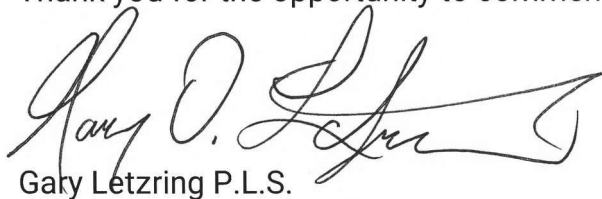
Also, it should be noted that property deeds will need to be exchanged between differing property owners. This is to place the Boundary Line Adjustment into the Title Records, which will be notice to future purchasers.

Additionally, Lot combinations should be separated entirely. Lot aggregation should be allowed on a reduced format, reduced review and fee. These should not be reviewed under the same criteria and cost of a Boundary Line Adjustment. A very simple Lot Combination is removing a separate tax parcel and buildable area. everything about them is different and not as demanding. Nor should a survey be required

Non-buildable tax title strips or tracts, and vacated right-of-way should be included as part of a parcel, where the land is able to be adjusted, just not to create a buildable property or new lot. Again, notes can be added to ensure compliance.

Zoning, urban growth area, overlays or jurisdictional boundaries, should not be a factor in performing a Boundary Line Adjustment. These lines were often created well after property settlement, and at times do not even follow property boundaries. The county should allow this somehow, and not create a strict prohibition.

Thank you for the opportunity to comment.

A handwritten signature in black ink, appearing to read "Gary O. Letzring". The signature is fluid and cursive, with a large initial "G" and "L".

Gary Letzring P.L.S.

Urban Member of the Washington State Survey Advisory Board

Bob Morse, PLS
morsebob360@gmail.com
360-739-8189

January 21, 2026

Scott Diener
Planning Manager
Kitsap County
SDiener@kitsap.gov

Scott,

Up until recently I have been the Professional Land Surveyor for the City of Bellingham and am a current member of the DNR Survey Advisory Board. It has been drawn to my attention of the Kitsap County draft of their Boundary Line Adjustment Code dated 12/02/2025, currently open for public comments.

Upon reviewing the draft Boundary Line Adjustment Code, I have the following comments.

J. Recording and Signature Requirements

May I suggest, even though this is not a unified recognized requirement, that not only the survey exhibit be prepared by a licensed surveyor but also the newly prepared legal descriptions. The professional surveyor is by far the most qualified person to create legal descriptions. Not only would this ensure the legal descriptions correlate with the survey exhibit, but their expert knowledge would minimize any in-depth review by County staff, who might not have the necessary background to fully interpret the various terms and protocols used in legal descriptions.

As far as the one-year period is concerned to record all final documents with the County Auditor, I would recommend the time limit be greatly reduced. Too many negative factors could occur in the meantime. For example, change of ownership or addition of encumbrances. These examples would create a title defect, place a cloud on the title, and could result in costly legal action or document amendments.

Finally, not mentioned in your code is any requirement to have boundary corners set for the newly created adjusted line(s). Many jurisdictions, including the City of Bellingham, require this. This puts not only the owners, but the public on notice of the location of the new boundary(s). Upon a licensed surveyor setting the corners a required public record would be created with the Auditor's Office in the form of a Record of Survey.

Please take my comments into consideration as you finalize your code and protect the public.

Thank you,

Bob Morse

Bob Morse, PLS



Outlook

Boundary Line Adjustment Code - Comment Form - Concerned Citizen

From Kitsap County <notifications@cognitoforms.com>

Date Mon 12/15/2025 9:29 AM

To CodeUpdates <CodeUpdates@kitsap.gov>

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Kitsap County

Boundary Line Adjustment Code - Comment Form

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Entry Details

NAME

Concerned Citizen

ADDRESS

PHONE

EMAIL

COMMENT

I am writing my opposition to the boundary line adjustment code, updated 12/02/2025, as it clearly harms future generations and residents and property owners. It will add significant government expense and review authority with zero public benefits.

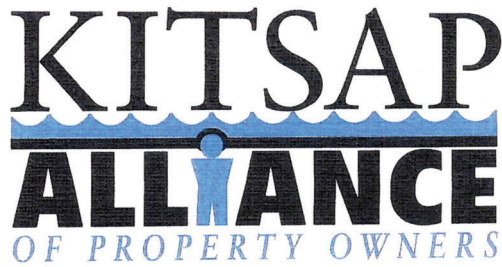
Currently, private property owners in Kitsap County can, for their own convenience and at their own risk, adjust their boundaries per state law, such as by the following codes: WAC 458-61A-109 (2)(a)(iv) Moving a property line to adjust property size and/or shape for owner convenience; and WAC 458-61A-109 (2)(a)(v) Selling a small section of property to an adjacent property owner.

As proposed in the proposed Kitsap BLA code update, these currently convenient property rights afforded by state law will become prohibited privileges in Kitsap County. These new privileges would be reviewed by DCD under subjective and strict standards, which is costly and harmful to the Kitsap County residents at large.

I urge the commissioners to reject this proposed BLA code in its entirety.

Over the past decade, Kitsap County has purchased thousands and thousands of acres of rural private land, removing thousands of potential family homesites from potentially being built responsibly in our County, putting extreme economic pressure on the balance of rural private land, contributing to the homeless crisis, and limiting opportunities for future generations. Creating new subjective barriers to what would otherwise be developable private lots seems to be a misguided priority in the department.

FILE ATTACHMENTS



January 29, 2026

KITSAP COUNTY PLANNING COMMISSION
619 Division Street MS – 38
Port Orchard, Washington 98366

SUBJECT: Opposition To The Proposed Ordinance To Regulate Boundary
Line Adjustments

Honorable Commissioners:

Three times now in the last 35-38- years the Department of Community Development has proposed an ordinance to regulate Boundary Line Adjustments (BLAs). Those prior attempts (two) and now this one here in 2026 were and are now met with opposition. The primary reason being, the ordinance is unnecessary and just as important promulgates an application process having an associated cost with indefinite time frames for DCD staff to perform their application review. Aside from these two issues, there are several other problems with the proposed BLA ordinance (December 2nd, 2025 draft) that are discussed herein.

Specifically, KITSAP ALLIANCE OF PROPERTY OWNERS (KAPO) objects to the effort of Kitsap County to impose local regulations on Boundary Line Adjustments (BLAs). Our reasons are summarized as follows with more commentary following:

1. State law regulations are adequate to stipulate when and how a BLA can be created. These same regulations have been used in Kitsap County for more than 45-years.
2. The proposed ordinance fails to distinguish the alteration of a boundary to fix a problem such as a building discovered to cross a neighbor's property line and other related problems from the alteration of a boundary that might make better provisions for buildable lot area.
3. Time frames for how long it might take for DCD (or other involved departments) to process a BLA application are not specified in the proposed ordinance, in Kitsap County Code (KCC) Chapter 21.04.250.A or elsewhere in the Procedures Ordinance. Also, of concern is the lack of staff qualified to review BLAs.

"The small landholders are the most precious part of the State." – Thomas Jefferson

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www.kitsapalliance.wordpress.com

4. Kitsap County assumes no responsibility for its role in the Zoning process which, failed to recognize or account for the thousands of prior divisions of land that have parcel sizes less than the minimum area requirement of the zone established. Consequently, with this proposed BLA ordinance the County is taking a dictatorial position that abridges the rights of land owners.
5. Kitsap County has failed to recognize that the objective of any proposed regulation is "to protect and maintain individual rights." Such mandate is derived from the Washington State's Constitution at Article I, Section I. Further, DCD staff has provided no evidence that land owners and citizens of the County played any role in the evaluation of the need for a BLA ordinance or in its construction.
6. Proliferation of regulatory measures has an adverse impact on land owners and the citizens of the County. The cost of housing affordable to all and possibly even posing barriers to population growth accommodation are concerns with new and expanded regulations.
7. Neither DCD or other Kitsap County officials have prepared any analysis of whether or not the County can afford to implement this new BLA ordinance regulation. There is most certainly a cost involved redounding to Kitsap County, but also there is a cost to the general public as well. Without a cost/benefit analysis, there are too many unknowns, not the least of which is the time delay required to approve a BLA application, which should be enough to void this proposed ordinance.
8. Lack of any evidence that DCD staff consulted with the Kitsap Association of Realtors, surveyors (several of which have long opposed a County ordinance providing for application review) and local attorney's who deal with boundary disputes and related issues in and outside of Superior Court.

The balance of this letter details the reasons why the KITSAP ALLIANCE OF PROPERTY OWNERS opposes adoption of a County Ordinance regulating BLAs is found in the following discussion of each of the eight points:

1. Washington State Revised Code of Washington (RCW) has provisions in 53.17.040(6) regulating BLAs. This section of law pertains to exemptions from platting requirements and reads as follows: "6) A *division made for the purpose of alteration by adjusting boundary lines, between platted or unplatted lots or both, which does not create any additional lot, tract, parcel, site, or division nor create any lot, tract, parcel, site, or division which contains insufficient area and dimension to meet minimum requirements for width and area for a building site;*"

Thus, pertinent to any assertions that BLAs create lots, that is simply not true.

2. There are many instances when a BLA is necessary to fix a problem created in a time when a property may not have been surveyed. For example, a house or garage may have encroached beyond a property line, this may be also problem affecting the location of a fence or even an access road. The simple way to resolve these situations is to adjust the common boundary. If the issue surfaces in a real estate sale transaction, the issue can be resolved within a week to two weeks with the aide of a licensed land surveyor. If there were to be an adopted BLA ordinance the on-two- week time frame would escalate into 6-9 – months or to over a year as is the case with such reviews in Pierce County. Clearly, either such wait times would kill a real estate transaction.
3. DCD staff has testified that BLA reviews would be processed as a Type I application. Type I applications require only DCD staff review and approval. According to the County's Procedures Ordinance KCC 21.04 and Subsection 250.A, any permit application whether Type I, Type II or Type III is to be processed within 120-days. Experience with DCD permit processing since May of 1998, shows that only building permit approvals (a Type I permit) have been issued in within this time frame. Keep in mind there is a whole division of DCD with qualified staff to review building permits. There are no qualified people in the balance of DCD to review BLAs. The person or persons with the required qualifications would be those with either a surveyor's licensed certification or perhaps someone who has worked for a surveyor's firm performing their duties but working under the license of the chief surveyor.
4. What Kitsap County cannot seem to reconcile with their claims that BLA's have been recorded that may have made nonconforming or unbuildable lots or parcels is that it is the County that adopted zoning lot sizes that completely ignore previous lot creation (under far less restrictive regulations). For example, there are literally thousands of lots in Rural – 5 Acre, Rural Protection 10-Acre and Rural Wooded Zoned areas that cannot meet the minimum lot size requirements of the zone applied by the County. Couple that fact with environmental regulations, which in some instances seem to make existing parcels so encumbered such that there are limited or no area for home sites. Thus, in many instances there is a need to adjust property lines to provide for buildable areas on the lots or parcels they own. The point is, property owners use BLAs as a way to mitigate the adverse effects of ill-conceived County zoning practices.

5. According to the Washington State Constitution Article I, Section 1 POLITICAL POWER. *All political power is inherent in the people and governments derive their just powers from the consent of the governed and are established to protect and maintain individual rights.* Unfortunately, Kitsap County has adopted the position that “government knows best” and the opinions of people and even critical critique of planned government activities get only a few lines in a public comment matrix. The fact is DCD staff is sole author of this proposed ordinance ordinance and not the people of Kitsap County, which goes along with the concept “government knows best,” and the people are only consulted for comment. Sadly, there is abundant evidence the citizen commentary, especially those with opposition opinions, is/are ignored.

What evidence has DCD staff brought forward showing that citizens from all parts of Kitsap County were part of a process to address this perceived need for new regulations for BLAs? The fact is there was no such group of citizens and there was no prior discussion (prior to the Planning Commission’s Work Study) with the citizens of Kitsap County on the proposed ordinance. So, how is it that this ordinance and/or the ordinance development process “protects and maintains individual rights?

Perhaps DCD staff might argue that the proposed ordinance has been posted on the Department of Community Development’s portion of the County’s website for several months last year (2025). As a result, citizens could have commented on its provisions there and all such comments received would be therefore summarized in a comment matrix. That response, if proffered, is witness to the fact that citizens only get to comment on proposed plans or legislation they do not get to have an involved role whereby the product is “derived from the consent of the governed.

6. Proliferation of regulations has an adverse impact on what citizens can do with their property. The proliferation of regulatory measures seldom bears any relationship with what works to build community or enable the people of Kitsap County to pursue their desired future land use structure. Since the advent of the Growth Management Act, the whole objective coming down from the State of Washington is the enforcement of “controls” to prevent property owners and the citizens of Kitsap County from creating the community they want.

What that has meant is a vast expansion of regulations, which enforce controls on what people can do, not just in the planning for the future, but how the citizens can use their property. While there are many examples that could be cited, the fact is that prior to 1998, Kitsap County's regulatory ordinances could have been printed in a one volume with about 300 – 400 pages (in total). That would account for 78-pages of zoning regulations, 120- pages of storm water regulations, a similar sized subdivision and short plat ordinance and 100-pages +/- of Shoreline Master Program. Between the early 1980s and 1998 with just these much less restrictive ordinances Kitsap County accommodated about 100,000 new people.

Since 1998, Kitsap's regulations have expanded to 1,500 – 2,000 pages (and counting) in those same four ordinances plus the Critical Areas Ordinance. Note, just the storm water regulations now fill two volumes with over 800-pages of control measures. * Correspondingly, the population increase over the last 28-years has added a little over half that 100,000 (about 59,000 new people). One could rightly question the fact that too many regulations thwart Kitsap County's Growth Management Act requirement to accept and provide for its share of the State's population increase.

Along with all of these new (and arguably unnecessary) regulations has come many adverse impacts on the landowner and potential home owners, among them is very high housing costs. Prices beyond what the median income household can afford. Part of the cost of a new home is the price paid for the land and that component of the home's value has increased 20x what building sites sold for in the 1980-1998 time period. Also, land development and building costs have risen substantially since 1998 and most, if not all of the price increases are attributable to regulation compliance.

- *There were no significant storm water design problems with the ordinance in effect prior to 2010. But the State Department of Ecology and Kitsap County decided that there was a need for triple the amount of design regulations and with that came a like cost increase for the end facility and the extension of the rules to be applicable to rural areas, where no significant problems existed.*

So, here we are with this proposed BLA ordinance seemingly adding only three-pages of new regulations. Noticeably, absent in these proposed relations is any discussion regarding the impact on property owners, the general citizenry, the future of Kitsap County's community or even the added cost to the price of a new home.

Also significant is the lack of a proportionality analysis. What is meant by that is an assessment of the instances over a 40-50 - year period wherein BLAs that were prepared and recorded in that time frame that proved to be noncompliant with State law. DCD staff has presented no such analysis. The point of such analysis is to show that while there may be some BLAs prepared and recorded outside the requirements of State Law (58.17.040(6)) the instances of such are statically insignificant (the expected conclusion(s)).

7. DCD has not provided any information regarding the cost of ordinance implementation. In Point 3 above, the issue of time of application approval was address as being indeterminate despite the provisions of KCC 21.04.250.A. Also mentioned in that discussion is the lack of qualified staff to review and approve proposed BLAs. Not addressed is the question of whether Kitsap County could afford to "staff up" or "gear up" to implement BLA reviews in the Department.

What is needed is a cost/benefit analysis to analyze whether or not Kitap County could afford to implement this ordinance. Reportedly, the County has indicated there is a short fall in revenues, one result of which is a hiring freeze that affects the Department of Community Development as well as other County departments. Aside from the direct costs Kitsap County might incur, there is the cost to the land owner, not just in application fees that would have to be paid, but the land owner's time involved is a cost to be reconciled and all such costs have to include the surveyor firm expenses preparing the application material. All of the cost data has to be weighed against any benefits there might be from this proposed ordinance.

As is true for so many of the regulations Kitsap County has adopted or might be contemplating now or in the future, the County has no clue about what impact new regulations will have on the County's ability to implement a new ordinance. Until and unless Kitsap County is willing to take the time to address the fiscal impacts of ordinance implementation, it has no business adopting any new regulations.

8. Lack of involvement of the Real Estate Community, attorneys who represent clients in boundary disputes and surveyors who prepare the BLA documentation which is recorded for record in the Auditor's Office. While it may be true that DCD staff consulted with a surveyor in the draft of the proposed ordinance, there are several firms, in Kitsap County who have long opposed a County review process for BLAs for many of the reasons cited in this letter of opposition.

Point No. 2 addressed above indicates that a Realtor's purchase and sale agreement could be voided by a protracted BLA application and review approval process. Where is the evidence the Kitsap Association of Realtors were contacted or involved in the construction of the proposed ordinance? Since attorneys undertake boundary conflict resolution cases, some of which are adjudicated in court, where is there documentation of the issues they face or what is concluded by a judge's decision?

For the foregoing reasons, KITSAP ALLIANCE OF PROPERTY OWNERS objects to any attempt of the County to adopt regulatory measures affecting how Boundary Line Adjustments are now prepared and recorded in the County Auditor's Office.

Respectfully submitted.



William M. Palmer, President
KITSAP ALLIANCE OF PROPERTY OWNERS

Encl: Proposed BLA Ordinance – December 2, 2025 Draft

PLANNING COMMISSION DRAFT

Boundary Line Adjustment Code KCC Chapter 16.04.xxx

Revised: 12/02/2025

A. Purpose.

The purpose of this section is to provide an administrative process for reviewing and approving adjustments to property lines between abutting properties. Boundary line adjustments are intended to be used in accordance with the provisions of [WAC 458-061A.109](#).

B. Applicability and Exemptions.

This chapter applies to boundary line adjustments between existing properties, including those involving mergers or aggregations. For the purposes of this section, “property” is a generic term that applies to all original or resulting lots, tracts, parcels, sites, or divisions; when a more specific term is used, the definition of that term in Chapter 16.10 shall apply. Boundary line agreements used solely to resolve boundary disputes consistent with [RCW 58.04.007](#) are exempt from the provisions of this chapter.

C. Adjustments Prohibited.

1. Adjustments of tracts, easements, vacated rights-of-way, and tax title strips are not permitted. For the purposes of this section, “tax title strip” is a narrow, often unusable strip of land associated with a tax-foreclosed property, which may have been created by surveying or platting errors.
2. Adjustment of a property shall not be permitted where separate properties are on either side of a road or right of way as respectively defined in KCC chapters [16.10.290](#) and [17.110](#).
3. No boundary line adjustment shall result in a property that crosses a zoning district boundary, urban growth area boundary, overlay district, tidelands, or jurisdictional boundary.

D. Permit Type and Review Authority.

Applications for boundary line adjustments shall be processed as a ministerial Type I application under [Chapter 21.04](#). The department director is authorized to review and approve, approve with conditions, or deny the application based on compliance with this chapter and other applicable county codes.

E. Review Criteria.

The Director shall approve a boundary line adjustment only if the following criteria are met:

1. No additional property, tract, parcel, or division results from the adjustment.
2. All resulting properties comply with applicable zoning standards for total area, buildable site, and dimensions, except that the Director may allow a boundary line adjustment for an existing nonconforming property if its degree of nonconformance to applicable zoning standards is not increased and no nonconformance is created or increased on other properties. Nonconformities apply to, but are not limited to, property size, setbacks, and dimensions.
3. No new public roads or extensions of public infrastructure would be required solely to serve the adjusted properties.
4. No conflicts with existing plat or permit conditions are created, and no existing plat or permit conditions are diminished, reduced, or eliminated.
5. All easements, access, and utilities are maintained or properly modified.
6. No adverse impacts on drainage, critical areas, water supply, septic systems, access, or utilities will result.
7. Resultant parcels must have a building site and suitable access. No resultant property may be created that causes the need for, during subsequent development as defined in [Chapter 17.110](#), an exception or variance to County development codes, including but not limited to Title 17 Zoning, Title 19 Critical Areas Ordinance, or Title 22 Shoreline Master Program. For protection of future buyers, the department will require recordation of a statement to this effect.
8. The adjustment is not part of a concurrent or sequential series of ~~multiple proposed adjustments which would result in the creation of additional lots, tracts, or building sites, or otherwise~~ circumvent the subdivision regulations in [Chapter 16.40](#), ~~including but not limited to having the effect of altering a recorded plat.~~
9. Boundary line adjustments within a recorded plat are permissible provided that they do not modify dedications, roads, easements, notes, or other features shown on the face of the plat, or its recorded conditions, that would require a formal plat alteration.
10. The adjustment will not create a building site from or on tracts or easements.
11. Properties ~~proposed to be served by onsite sewage disposal systems~~ must be reviewed and approved by the Kitsap ~~Public County~~ Health District prior to director approval. Applicants must demonstrate compliance with applicable health and sanitation standards, including minimum separation distances between structures and wells, or between structures and septic primary or reserve areas, located both on the subject properties and nearby properties.
12. None of the properties included in an approved boundary line adjustment may be further adjusted or altered within a period of five years unless a short plat or preliminary plat application is made for such property or properties.

F. Property Combinations (Mergers).

Boundary line adjustments may be used to permanently merge or aggregate abutting properties under the following conditions:

1. Properties, before or after adjustments, may not be separated by a dedicated right-of-way.
2. Properties that do not individually meet current development standards may be combined to create a conforming lot.
- ~~3. Following approval, revised legal descriptions and survey maps, prepared in accordance with state law, must be recorded with the County Auditor.~~
4. Mergers result in new permanently-established properties, which may only be subdivided in the future according to the requirements of [Title 16](#).

Applicants are encouraged to be aware of the 'Declaration of Aggregation' program that the County Auditor provides.

G. Legal Lot Determination.

When a boundary line adjustment is proposed under this chapter, requirements for legal lot determination may be deemed satisfied if the lots to be adjusted were previously determined legal under [Chapter 16.62](#), or if the adjustment resolves discrepancies discovered in the determination process.

H. Pre-Application Conference

Prior to submittal of an application for a boundary line adjustment, applicants are encouraged, but are not required, to schedule an hourly-rate meeting as provided in [Section 21.04.120](#).

I. Submittal Requirements

Submittal requirements shall be specified in the BLA application guide and the submittal checklist and forms prepared by the Department.

J. Recording and Signature Requirements.

Within one year of approval of the application for a boundary line adjustment or a property combination (merger), the applicant is required to record all final documents with the County Auditor, including the survey map signed and stamped by the Surveyor, revised legal descriptions, and any deeds conveying property. Recording shall be at the expense of the applicant. The applicant shall obtain all required signatures prior to recording, including those of the County Auditor, County Treasurer, and Department director.

From: Anthony and Rebecca Augello <chipaugel77@gmail.com>

Sent: Friday, January 30, 2026 9:58 PM

To: Clara Jewell <CJewell@kitsap.gov>

Subject: Boundary Line Adjustment (BLA) Code Comments

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To Whom It May Concern,

Regarding the upcoming meeting for the Boundary Line Adjustment Code, this email is for anyone in the decision making process to consider that all applicants for any BLA should have to pay nonrefundable fees. This would encourage any applicant to ensure due diligence is being performed in the research of any proposed boundary line adjustment and also because this is standard practice in Washington. Also, any neighbors adjacent to any proposed BLA (no matter how "small") should be notified so they have sufficient time to provide input regarding any such proposal. This is just common sense.

Sincerely,
Anthony C Augello
Port Orchard, WA