

Year of Rural Comment Form
09/02/25-09/23/25

Date Submitted	Id	Name First	Name Last	Comments	City	State
9/3/2025 9:42 AM	1	Joanne	Corey	If a commercial warehousing retail sales feed/forage along with a horse boarding facility moved into a well established SFRR with numerous complaints safety issues will they be Grandfathered in? y	Silverdale	
9/4/2025 8:29 AM	2	Lauren	Keehn	I oppose the proposed updates because they threaten Kitsap County's rural character. Rural lands are vital for agriculture, equestrian use, open space, and wildlife. Overdevelopment of residential housing is eroding these lands and once they are gone, they cannot be replaced. Please protect rural lands by limiting rezoning, prioritizing farming and conservation, and preventing dense housing in rural areas. The Comprehensive Plan should safeguard Kitsap's rural identity for future generations.	Port orchard	Washington
9/4/2025 9:39 AM	3	Arick	Olson	The proposed equestrian facility code is legally vulnerable on multiple fronts: 1. Duplication of Existing Law (Unnecessary Regulation) Best Management Practices (BMPs) for manure, dust, and runoff are already required by the Kitsap Conservation District under RCW 89.08. Nuisance, odor, and noise are already governed by existing county nuisance codes (KCC Title 9). Adding duplicative permitting conditions without new standards is regulatory overreach that conflicts with established state mandates. 2. Vague and Arbitrary Standards (Due Process Violation) Requiring applicants to "prove" they will not generate nuisance conditions (odor, dust, noise) lacks measurable criteria. Washington courts have repeatedly held that zoning ordinances must contain clear, ascertainable standards to avoid arbitrary enforcement (Norco Constr. v. King County, 97 Wn.2d 680 (1982)). Vague standards expose the County to challenges under the Due Process Clauses of both the U.S. Constitution (14th Amendment) and the Washington State Constitution (Article I, Section 3). 3. Regulatory Takings (Property Rights Violation) Mandating 200-foot setbacks for paddocks and manure piles effectively prohibits equestrian use on smaller rural parcels. When regulations deprive a landowner of all reasonable economic use of property, it constitutes a regulatory taking (Lucas v. South Carolina Coastal Council, 505 U.S. 1003 (1992); Presbytery of Seattle v. King County, 114 Wn.2d 320 (1990)). Both the U.S. Constitution (5th Amendment, Takings Clause) and Washington Constitution (Article I, Section 16) protect against uncompensated regulatory takings. 4. Disparate and Unequal Treatment The distinction between boarding-only facilities (Type II CUP) and facilities offering lessons/training (Type III CUP) is arbitrary. These are substantially similar land uses but are treated with drastically different permitting burdens, raising equal protection concerns under the U.S. Constitution (14th Amendment) and Washington State Constitution (Article I, Section 12). 5. Growth Management Act Conflict The Growth Management Act requires counties to conserve and encourage agricultural uses (RCW 36.70A.170 and RCW 36.70A.177). By making small-scale equestrian operations unworkable through excessive setbacks, CUP requirements, and operational limits, this ordinance directly undermines agricultural viability. This exposes Kitsap County to a Growth Management Hearings Board appeal for failure to comply with the GMA. 6. Procedural Overreach The requirement that any expansion of a facility triggers new CUP review — even without intensification of impacts — creates a perpetual permitting trap. Washington courts disfavor land-use codes that impose open-ended discretionary review without objective criteria (Anderson v. Issaquah, 70 Wn. App. 64 (1993)). This ordinance does not create new protections for neighbors or the environment. Those protections already exist under Washington law. What it does is pile on redundant, vague, and exclusionary regulation that disproportionately punishes small equestrian facilities while favoring the largest commercial operations. In doing so, it risks violating the U.S. Constitution (5th and 14th Amendments), the Washington State Constitution (Article I, Sections 3, 12, and 16), and the Growth Management Act (RCW 36.70A.170–.177). The last thing this county needs is to spend more money on extensive legal battles that would crop up, were this to be put into place.	PORT ORCHARD	Washington
9/4/2025 11:00 AM	4	Mariah	Fair	These changes would poorly affect my family and many others. Horses provide therapeutic, emotional support, they teach partnership, and build strength as well as endurance. These proposed changes would make almost all equestrian facilities in our area extinct, it would make take away tremendously from our community.	Kingston	Washington
9/4/2025 11:19 AM	5	Samarra	McBrearty	I keep my own horse at home. I chose that because I will not compromise on welfare. Still, I recognize that boarding barns are essential in this county. Many horse owners don't have the land, and without boarding facilities, horses would lose their homes. What I've seen in the Pacific Northwest is very different from the equestrian standards I grew up with elsewhere. Here, many barns operate on small parcels, with horses confined to tiny dry lots, and very little real turnout. That may be common practice, but it does not reflect what most people would call humane care. I understand why boarding businesses are worried. The proposed ordinance, as written, sets a one-horse-per-half-acre limit, large setbacks, and strict permitting. If enforced all at once, this will put a lot of barns out of business. And that isn't a real solution either, because horse owners still need places to go. I support the county's intent. Horses deserve higher standards, and the public deserves assurance that manure and runoff are managed responsibly. But there is a path to better welfare without collapsing the local industry. I'd like to suggest three compromises: •First, phase in the density requirement. Begin with one horse per quarter acre, then move to one per half acre over five to seven years. That gives barns time to adapt. •Second, scale the setbacks. Keep 200 feet for large facilities, but allow 100 feet for small operations that use approved manure handling or vegetative buffers. •Third, extend operating hours slightly, to 9:30 p.m., to allow for evening lessons, while keeping restrictions on amplified sound. This way, the ordinance holds the line on welfare, while giving local barns a fair chance to adjust. I urge you to adopt standards that move our county forward, but with flexibility, so we don't lose the very infrastructure horse owners depend on. Thank you.	Gig Harbor	Washington
9/4/2025 3:49 PM	6	Heidi	Elmore	I am looking to move to Kitsap County from King County. I would like to build a horse boarding facility and I am concerned about the suggested changes for equestrian facilities. Maybe a high-end facility isn't the concern that prompted these zoning changes. But I am concerned enough where I am paying attention to decide if I should move.	Sammamish	Washington

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Date Submitted	Id	Name First	Name Last	Comments	City	State
9/4/2025 6:52 PM	7	Sunnie	Merritt	If they take away even some of our boarding facilities the results in Kitsap County will be catastrophic. Speaking as a boarder, rates will go up and we will all scramble to find places to go. The barn owners will suffer even worse and lose their very livelihoods. A significant amount of tax money will go to other counties as boarders move to other facilities, for example I will take my several thousand dollars a month to Pierce County. Most the facilities I have boarded at have been immaculately clean and in no way both surrounding properties. They have good programs to manage urine and manure, traffic in and out, and noise etc. if there have been a few that caused issues fix those problems specifically- don't punish the majority. Do you really want to be known as a county who hates forests, hates outdoor recreation? That is what is seems you are turning into. Just when I was starting to believe you were more than "kidnap county" ...that is what all the other counties call you.	Gig Harbor	Washington
9/5/2025 1:02 AM	8	Harrison	Boles	My name is Harrison Boles, and I'm a resident of Kitsap County. I want to highlight a conflict between the County's stated goals for preserving rural character and the proposed zoning code changes for equestrian facilities. In the Rural and Resource Lands Draft, the County defines rural character as "open spaces, working farms and forests, and traditional rural lifestyles such as farming, forestry, and horseback riding, while sustaining rural economies and community identity". The policies go further, committing to "support traditional rural lifestyles and rural-based economies, including farming [and] horseback riding". But the proposed equestrian facility code imposes rules that run directly against these goals: It requires Type II or Type III Conditional Use Permits just to board horses or teach riding lessons. These costly, bureaucratic processes create barriers for small family barns that rely on lessons and clinics to stay viable. It mandates 200-foot setbacks for paddocks and manure storage. On smaller parcels typical of family-run farms, this is effectively a ban on operating at all. It limits hours of operation to 7 a.m.–8 p.m., restricting riding and lessons during evenings—precisely when working families are available. And it requires separate permits for shows, clinics, or community events, even though these gatherings are central to rural tradition and the equestrian economy. These restrictions don't preserve rural character—they undermine it. Instead of "supporting traditional rural lifestyles and rural-based economies", they make it harder for ordinary people to sustain small equestrian operations. Instead of "protecting working lands as vital to rural identity and economic resilience", they impose urban-style regulations that will drive out family-scale barns. The County's own rural vision promises to foster horseback riding, community gathering, and sustainable small-scale economies. If these proposed equestrian regulations move forward as written, they will do the opposite. I urge the County to align the code with its stated vision: support small equestrian facilities, not burden them. Family barns and lesson programs are not a nuisance—they are the living embodiment of rural character in Kitsap County. Thank you.	Indianola	Washington
9/5/2025 2:26 PM	9	Megan	Thompson	I am specifically addressing the changes in regards to any equestrian facilities. Kitsap County is mainly rural and activities that keep it rural should be encouraged and supported. These excessive operating requirements and permitting are designed to choke out the very essence of rural areas and should NOT be implemented. It will have a severely negative effect on agricultural lands and the people who enjoy them. Why are you trying to make up into a city when we're not and don't want to be?	Port Orchard	Washington
9/5/2025 4:46 PM	10	Cassie	Olsen	Dear Commissioners, I am writing as a Kitsap County resident, business owner, and part of the equestrian community to express my deep concern about the proposed equestrian facility regulations currently under consideration. These restrictions would devastate small, family-run businesses like ours. Our livelihood depends on boarding, training, and caring for horses — activities that not only sustain our family but also support dozens of local jobs, farriers, veterinarians, feed stores, and youth riding programs. Limiting or eliminating horse boarding on private property will ripple far beyond our barn doors, undermining an entire ecosystem of businesses and services tied to equestrian activity. Horses are not only our livelihood — they are part of Kitsap County's heritage and rural identity. Generations of families here have grown up learning responsibility, discipline, and confidence through horses. These regulations threaten to erase that tradition and close the door on opportunities for future generations. Please understand: if these proposals move forward, they will not only force many of us out of business, they will strip Kitsap County of an industry that contributes to our economy, our culture, and our way of life. I urge you to reject these measures and instead work with the equestrian community to create fair, practical policies that protect both neighbors' concerns and the rights of responsible landowners. We want to be good community members, and we want to see Kitsap thrive — but these proposals would destroy the foundation of our businesses and our rural traditions. Thank you for listening to the voices of your equestrian community. I respectfully ask you to oppose these regulations and preserve both our rights and our livelihoods. Sincerely, Cassie	Port Orchard	Washington

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9/5/2025 5:30 PM	11	carla	larson	Real correct physical addresses. not guessimates that are continuously wrong	silverdale	Washington
9/5/2025 5:38 PM	12	Mark	Housmyer	Key Elements that May Trend Away from Conservative Viewpoints Focus on Urban Growth and Density: The draft policies emphasize directing the majority of growth to urban areas (Urban Growth Areas or UGAs) and promoting higher-density housing and mixed-use development within those centers. This approach is often at odds with the conservative principle of property rights and the freedom for individuals to develop their land as they see fit, regardless of location. Some conservative viewpoints on land use advocate for deregulation and allowing the free market to determine development patterns, which may lead to more dispersed growth. The policy's goal to "prevent the spread of urban infrastructure into rural areas" can be viewed as a limitation on rural property owners' ability to develop their land. Environmental and Resource Protection: The policies prioritize protecting forests, farms, open space, and natural systems. While environmental stewardship is a shared value, the methods to achieve it—such as land use regulations, critical area protections, and reclassification of resource lands—can be seen by some conservatives as an overreach of government authority that restricts a property owner's ability to use their land for economic purposes. The GMA's emphasis on limiting low-density sprawl and land conversion can be viewed as government interference in the market. Mandated Planning and Regulation: The entire process is a product of the state-mandated Growth Management Act. This top-down, regulatory approach to land use planning is in contrast with a more traditional conservative view that favors local control and minimal government intervention. The GMA sets a framework that requires counties to plan for growth and implement policies to achieve specific goals, which some consider a burden on taxpayers and an erosion of local autonomy. Points that May Align with Conservative Viewpoints Property Rights and Rural Character: The stated intent to preserve rural character and sustain rural communities aligns with the conservative value of maintaining traditional lifestyles and local control. While the methods may be debated, the goal of protecting rural land from incompatible uses and maintaining low-density development can resonate with those who want to protect their private property from the negative impacts of nearby development. Timely Permit Processing: One of the goals of the GMA and related county policies is to process permits in a timely and fair manner. This aligns with conservative support for efficient government and reducing bureaucratic hurdles for businesses and property owners. Free Market Arguments for Zoning Reform: There is a growing movement within conservative circles that argues against overly restrictive single-family zoning and other regulations. This viewpoint suggests that such regulations create an artificial housing shortage, drive up costs, and hinder the free market. While the Kitsap County policy doesn't eliminate zoning, its focus on directing growth to UGAs and encouraging diverse housing types in those areas could be seen as a way to address housing supply issues, a point that is increasingly resonating with some free-market conservatives.	Poulsbo	Washington
9/5/2025 5:39 PM	13	Anthony	Rose	Why are you wasting time and tax dollars punishing rural land owners by preventing them from keeping livestock on their property? We're a rural county with small urban areas, not north Tacoma or western Seattle. Strike all changes to 17.455.030 and fire the board member who has a problem with their neighbor or we'll fire all of you.	Port Orchard	Washington
9/5/2025 8:17 PM	14	Michele	Robinson	My concern is not apparently listed. I'm concerned about the proposal having to do with horse facilities/properties. The proposals I am seeing would be crippling to most properties that now house horses. Small business farms, boarding facilities, rescues and private owners will be impacted. I hope the wellbeing of those that own/operate these properties will be listened to.	Port Orchard	Washington
9/5/2025 8:20 PM	15	Deborah	Dolman	It would be very helpful if you would show the current policy and then the proposed change. It currently is not user friendly. Hard to figure out what is being proposed.	Poulsbo	Washington
9/6/2025 9:05 AM	16	Dee	Robinson	Subject: Urgent Opposition to Proposed Equestrian Code Amendment I urgently oppose the proposed amendment to the Kitsap County Code that would make it virtually impossible to operate equestrian facilities. This change is unacceptable. Equestrian and agricultural operations are essential to Kitsap's economy, culture, and rural character. They provide recreation, jobs, youth programs like 4-H, and even therapeutic riding services for veterans and individuals with disabilities. Eliminating their ability to exist would devastate families, small businesses, and our community's heritage. I strongly urge you to reject this harmful revision and work instead with stakeholders to create fair, balanced regulations that support—not destroy—our equestrian and agricultural community. Please do not let these amendments pass.	Poulsbo	
9/6/2025 11:03 AM	17	Ron	Thomas	SB 5471 provides changes to allow LAMIRD zones substantial infill provisions. There is no indication of these Kitsap County Code changes in this Plan Update.	Suquamish	Washington
9/6/2025 3:19 PM	18	Trish	Strong	Subject: Urgent Opposition to Proposed Equestrian Code Amendment I urgently oppose the proposed amendment to the Kitsap County Code that would make it virtually impossible to operate equestrian facilities. This change is unacceptable. Equestrian and agricultural operations are essential to Kitsap's economy, culture, and rural character. They provide recreation, jobs, youth programs like 4-H, and even therapeutic riding services for veterans and individuals with disabilities. Eliminating their ability to exist would devastate families, small businesses, and our community's heritage. I strongly urge you to reject this harmful revision and work instead with stakeholders to create fair, balanced regulations that support—not destroy—our equestrian and agricultural community. Please do not let this pass	Poulsbo	Washington
9/6/2025 3:46 PM	19	Jennifer	Gillies	We need to stop developing the forests and farmland. This year we've had deer, coyote, and bear in our yard in Parkwood East in East Bremerton and it's because the animals are losing their habitat. They have no place to go so they're wandering into neighborhoods and creating safety concerns for both the animals and the humans. There are businesses all over Silverdale and Bremerton sitting unused while we continue to cut down more trees and develop the land. We need more green spaces for our physical and mental health. We need to preserve spaces for our salmon, bald eagles, old growth trees, etc. We aren't Seattle. The reason people live here is that it's smaller, slower-paced, less expensive, and still has some natural habitat. We are Kitsap County, not King County. Stop destroying our forests!	Bremerton	Washington
9/6/2025 5:36 PM	20	Melissa	Lissy	Subject: Urgent Opposition to Proposed Equestrian Code Amendment I urgently oppose the proposed amendment to the Kitsap County Code that would make it virtually impossible to operate equestrian facilities. This change is unacceptable. Equestrian and agricultural operations are essential to Kitsap's economy, culture, and rural character. They provide recreation, jobs, youth programs like 4-H, and even therapeutic riding services for veterans and individuals with disabilities. Eliminating their ability to exist would devastate families, small businesses, and our community's heritage. I strongly urge you to reject this harmful revision and work instead with stakeholders to create fair, balanced regulations that support—not destroy—our equestrian and agricultural community. Please do not let these amendments pass.	Poulsbo	
9/6/2025 8:03 PM	21	Janet	Spears	I'm covering all of my bases here... i strongly oppose the attack on horse facilities that are being proposed in this new rural update plan. As a horse owning community member and a former 4-H club and Project leader here in Kitsap County, I cannot believe what these changes to our rural horse use and activities will do to the equestrian youth in our county. Not to mention the ability to maintain horses on the property of area land owners. The Horse Community of Kitsap County has held the largest number of horses on our side of the State. We contribute to the success of a large number of businesses in the entire State. Hay, grain, specialty feeds, pasture and forage seed, large animal veterinary services, grooming, Healthcare supplies, tack, outerwear for both horse and rider, farrier services, horse shows and other competitions, and do not forget the possibility of therapeutic equine programs for disabled people of all kinds. The property taxes paid by horse property owners, both large and small, make a sizeable contribution to the County's coffers. We need our Saddle Clubs and boarding, breeding and training facilities to enable Kitsap County's horse community to thrive. Why should our pttimes be curtailed from our current level? Most of our facilities, have been inthe county for many, many years. From the time before all the developement. We are as rural as the farmers and ranchers in this county, and deserve to preserve our way of life as well. Please consider this when making decisions about our usage of our land.	Port Orchard	Washington

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9/6/2025 11:09 PM	22	LeeAnn	Contreras	Subject: Urgent Opposition to Proposed Equestrian Code Amendment I urgently oppose the proposed amendment to the Kitsap County Code that would make it virtually impossible to operate equestrian facilities. This change is unacceptable. Equestrian and agricultural operations are essential to Kitsap's economy, culture, and rural character. They provide recreation, jobs, youth programs like 4-H, and even therapeutic riding services for veterans and individuals with disabilities. Eliminating their ability to exist would devastate families, small businesses, and our community's heritage. I strongly urge you to reject this harmful revision and work instead with stakeholders to create fair, balanced regulations that support—not destroy—our equestrian and agricultural community. Please do not let these amendments pass. All farms are important to the community. No new restrictions should be imposed.	Port Orchard	Washington
9/7/2025 2:35 AM	23	Jane	Evanson	New development destroyed spring and groundwater on my property	Bremerton	Washington
9/7/2025 7:13 AM	24	Denise	Brooks	We have a small 5 acre horse farm, just our own horses but there are a lot of pieces of equipment needed to keep it running well and looking nice. We can't possibly hide all the implements from every neighbor, that would require a huge barn. The process of getting permits alone would bankrupt us let alone the cost of building materials. And paddocks 200 feet from property lines?? Our property is only 265 feet wide! We can't just move because this is where our jobs are at, jobs we GO to.	Burley	Washington
9/7/2025 8:00 AM	25	Joanne	Corey	Sec 17.360.030 "owners of an easement " suggest to include the impact on Dominant Estate holders that are impacted as much as easement holders to the impact on their ingress /egress.	Silverdale	Washington
9/7/2025 9:07 AM	26	Jessica	Contreras	We need our rural spaces. We need the trees to help our air quality and weather. I can from Southern California and moved here because of the rural spaces and trees. Please don't make us like Southern California, treeless with houses as far as the eyes can see and hot, so very hot. The valley I lived in used to be cooler when there were more trees. They cut down trees and the valley got hotter. Now it's on fire all the time! Keep our rural spaces!	Port Orchard	Washington
9/7/2025 10:03 AM	27	Colen	Corey	How many primary uses can 1 property have? Such as Horse Boarding , Animal Husbandry breeding horse, would it still be residential or zoned something else ?	Silverdale	Washington
9/7/2025 1:11 PM	28	Dorrie	Strader	I think that the code for ADU's in Kitsap County should be amended. Why are you limiting ADU size to only 900 sq ft and only 1 per property for large acreage parcels? Many families (Like mine) that have acreage would like to be able to help the next generation get a head start in home ownership. But it is very difficult to squeeze a young family of 4+ into a small 900 sq ft home. Give us a realistic size like 1500 sq ft for an ADU. This larger size option could fix the housing crisis in our area. Allowing more than 1 ADU on large acreage would also helping. If the City is allowed larger ADU sizes and multiple ADUs on their tiny lots, why don't you allow this for large lot rural property owners as well?	Poulsbo	Washington
9/7/2025 4:43 PM	29	Leigh Anne	Hardy	Subject: Urgent Opposition to Proposed Equestrian Code Amendment I urgently oppose the proposed amendment to the Kitsap County Code that would make it virtually impossible to operate equestrian facilities. This change is unacceptable. Equestrian and agricultural operations are essential to Kitsap's economy, culture, and rural character. They provide recreation, jobs, youth programs like 4-H, and even therapeutic riding services for veterans and individuals with disabilities. Eliminating their ability to exist would devastate families, small businesses, and our community's heritage. I strongly urge you to reject this harmful revision and work instead with stakeholders to create fair, balanced regulations that support—not destroy—our equestrian and agricultural community. Please do not let these amendments pass.	Poulsbo	
9/8/2025 9:42 AM	30	Karen	Korinke	I understand there is an attempt to push new equine activity restrictions in rural areas. I live near Banner Forest on small acreage. I have no immediate horse neighbors, but plenty a short ways away. I understand the issues with livestock and well water contamination, but the biggest problem with our own well is from neighbor septic tanks that aren't being maintained. I would absolutely hate the character of our area to be drastically changed by extreme limitations of horse boarding and other activities, as well as people who merely own a horse or two. This is not city or suburbia and it should be left alone and not curtail our animal housing. Keep Kitsap simple and rural!	PORT ORCHARD	Washington

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9/8/2025 9:44 AM	31	Kerry	McConkey	2025 Horse Facilities Draft Code. I am writing to oppose the proposed draft code changes for equestrian facilities dated September 2, 2025. As a horse owner who boards at a local facility, I rely on boarding barns to keep my horse healthy and safe. Many horse owners in Kitsap County do not have the land or resources to keep horses at home, which makes boarding barns essential to maintaining equestrian activities and culture in our community. The proposed requirement that boarding-only facilities obtain conditional use permits, along with increased setbacks and restrictions, will make it extremely difficult for these facilities to remain viable. The added permitting costs and uncertainty will likely force some barns to close, leaving boarders like myself without options. Equestrian boarding is a longstanding and valued part of Kitsap's rural character. These facilities support local agriculture, recreation, youth programs, and 4-H/FFA activities. Instead of overregulation, I urge the County to recognize boarding barns as part of agricultural use and protect them as an essential service. I respectfully request that the County reconsider these provisions and work with horse owners, barn operators, and the equestrian community to create a balanced code that supports environmental stewardship without eliminating access to horses for residents who depend on boarding barns.	Bremerton	Washington
9/8/2025 12:50 PM	32			How can you possibly think this is a good idea! Greedy greedy greedy proposal and you all should be ashamed!		
9/8/2025 12:53 PM	33			Dear Commissioners, I am writing as a Kitsap County resident, horse owner, and small business operator to express my deep concern with the proposed code changes regarding horse facilities. These regulations would devastate our equestrian community and make it nearly impossible for small barns, trainers, and boarding operations to survive. Horses are not just a business — they are a way of life in our county. Families like mine have invested years of hard work and resources into creating safe, healthy environments for our animals, and these new requirements would strip away both our livelihoods and our heritage. Restricting boarding, training, and equestrian services under the guise of “regulation” will not protect the community — it will kill local business, drive horse owners away, and destroy the rural character of Kitsap County. Neighboring counties (Island, Skagit, Snohomish) do not enforce rules like these because they recognize that horses contribute to the economy, to open space preservation, and to the quality of life for families. I urge you to reconsider these changes and work with the equestrian community rather than against it. We are more than willing to collaborate on reasonable, balanced standards that ensure safety without erasing an entire industry. Please don't pass regulations that would cause irreparable harm to small farms, 4-H families, trainers, farriers, and boarding barns that are the heart of Kitsap's equestrian culture. Thank you for your time and for considering the real human and economic cost of these proposals.		
9/8/2025 1:05 PM	34	Mary	Jones	I love the childcare proposed plan. Our community needs more quality care available	Poulsbo	Washington
9/8/2025 1:55 PM	35			Stop the greed!! What you are proposing will ruin the horse community here!!!! Do not make these changes!!!		
9/8/2025 2:24 PM	36	Nicole	Carter	I urgently oppose the proposed amendment to the Kitsap County Code that would make it virtually impossible to operate equestrian facilities. This change is unacceptable. Equestrian and agricultural operations are essential to Kitsap's economy, culture, and rural character. They provide recreation, jobs, youth programs like 4-H, and even therapeutic riding services for veterans and individuals with disabilities. Eliminating their ability to exist would devastate families, small businesses, and our community's heritage. I strongly urge you to reject this harmful revision and work instead with stakeholders to create fair, balanced regulations that support—not destroy—our equestrian and agricultural community. Please do not let these amendments pass. I don't reside in Kitsap County, but I work and keep horses in Kitsap County and it would be detrimental to me and many other horse owners if we have no where to board them. It would lead to a similar houseless animal crisis that dogs and cats are going through. We already don't have enough Equestrian Facilities for our riders as it is	Tahuya	Washington
9/8/2025 2:58 PM	37	Christopher	Pursley	Absolute horseshit. Overly restrictive to our current and future equestrian boarding community that I am a part of and attack on what makes Kitsap a rural paradise. We are not the extension of Seattle that you want us to be, and my vote will say it in the next round.	Port Orchard	
9/8/2025 4:40 PM	38	Luke	Chermak	Please remove any additional restrictions on our freedoms for our properties.	PORT ORCHARD	Washington
9/8/2025 6:58 PM	39	THOMAS	LUNDGREN	Who wrote this piece of trash? If I have 20 acres, I am going to use every square inch if it. Some dork in the county government telling me I can only use a small portion of is a violation of my property rights. How would you like it if someone were to tell you that you can only use the kitchen if of your house?	Olalla	Washington
9/8/2025 7:05 PM	40	Lisa	Sater Gately	I have read how the code update will cause several to have to get rid of their horses. All existing horse owners should be grandfathered in and allowed to keep their live stock and barns.	belfair	Washington

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Date Submitted	Id	Name First	Name Last	Comments	City	State
				Opposition to Proposed Restrictions on Equestrian and Agricultural Facilities Dear Commissioners and Planning Staff, I am writing to strongly oppose the proposed restrictions in the Kitsap County Code revisions related to livestock management and equestrian facilities. While I appreciate the County's stated goal of minimizing negative impacts to neighboring properties, these restrictions are overly burdensome, inequitable, and risk eliminating equestrian activity in Kitsap County. Instead of supporting small-scale agriculture and rural heritage, they create barriers that are impractical, costly, and inconsistent with the County's comprehensive plan. Opposition to Proposed Restrictions 1. Excessive Setback Requirements The proposed 200-foot setback for paddocks and manure storage is unworkable for small and mid-sized properties. Many rural parcels in Kitsap are under 5 acres; this requirement effectively bans equestrian facilities on them, contradicting the County's intent to allow small-parcel agriculture. 2. Disproportionate Permitting Burden Requiring a Type III Conditional Use Permit for training, lessons, or clinics treats small-scale facilities the same as large commercial event venues. This process is prohibitively costly and will drive out local equestrian services that families and youth programs rely on. 3. Contradictions with County Goals The Comprehensive Plan emphasizes preserving rural character, agriculture, and recreation. These restrictions undermine those goals by making equestrian operations nearly impossible to maintain.	Port Orchard	Washington
9/8/2025 7:15 PM	41	Kristine	Goss	4. Economic & Community Impact Equestrian facilities provide jobs, support local businesses, offer therapeutic riding, 4-H, and youth opportunities, and draw tourism. These rules risk eliminating a sector that contributes significantly to Kitsap's rural economy and culture. 5. Additional Restrictions (Horse Limits, Hours, Screening, Expansions) A flat "one horse per half-acre" density limit ignores site-specific management practices and unfairly penalizes small landowners. Restricting hours of operation to 7:00 a.m.–8:00 p.m. disregards the reality of horse care, which requires flexibility around feeding, vet care, and training schedules. Mandatory screening for parking, manure, and equipment is costly and unnecessary in many cases where impacts are minimal. Requiring new permits for every small expansion or minor ancillary activity (e.g., tack sales, clinics) creates red tape and discourages equestrian entrepreneurship. Alternative Solutions Rather than rigid prohibitions, the County should adopt performance-based, flexible standards that protect neighbors and the environment while allowing equestrian facilities to operate responsibly: 1. Scaled Setbacks by Parcel Size Tier setbacks according to acreage (e.g., 50–75 feet for <5 acres, 100 feet for 5–10 acres, 200 feet for >10 acres). 2. Horse Density Based on Farm Plan, Not Acreage Alone Let horse numbers be determined through an approved Kitsap Conservation District farm plan, which considers pasture quality, rotational grazing, and manure systems. 3. Operational Flexibility with Impact Mitigation Instead of rigid hours, require facilities to mitigate noise, lighting, and traffic if activities extend beyond daytime hours. Routine care and small lessons should remain unrestricted. 4. Contextual Screening Requirements Require screening only where visual impacts exist, using cost-effective vegetation buffers or fencing rather than blanket mandates. 5. Streamlined Permitting for Ancillary Uses Allow lessons, clinics, tack sales, and small-scale community activities under the same permit, reserving separate review only for large-scale commercial events. 6. Farm Plan as the Compliance Cornerstone Keep Kitsap Conservation District farm plan approval as the key requirement, with periodic review to ensure best management practices for manure, runoff, and dust control. 7. Proportional Review for Expansions Minor facility expansions should require only administrative review, not a new CUP. Only major expansions or event-level operations should trigger new permitting. Conclusion Kitsap County has a proud tradition of rural living, farming, and equestrian culture. These proposed restrictions threaten that legacy by overregulating small-scale operators and making equestrian activities nearly impossible. A more balanced approach—centered on farm plan–based management, performance standards, and proportional permitting—can protect public health and the environment without destroying equestrian viability. I urge you to reject the proposed restrictions as currently written and instead adopt a flexible, farm plan–driven regulatory framework that truly supports Kitsap's agricultural community and rural character. Respectfully, Kristine Marie		
9/9/2025 4:46 AM	42	Samantha	Reed	The changes to equestrian facilities would decimate the equine community in kitsap county. As an up and coming theraputic riding center this would make it nearly impossible for me to build a riding arena, host events, and help the community.	Bremerton	Washington

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Date Submitted	Id	Name First	Name Last	Comments	City	State
9/9/2025 7:33 AM	43	Janet	O'Connell	This is a horrible plan! That will negatively affect the community and home owners and those who own and board horses, trainers, farriers, vets, show and clinic facilities. We live here for the rural amenities and the opportunity to own horses. It will be devastating to suppliers of rural, livestock, property owners, and all those businesses connected to our community. I am vehemently opposed to these changes. Horse ownership in the Kitsap community is huge. It's a healthy sport enjoyed by 4H kids and FFA. Boarding facilities that have been around for years and private property owners will be negatively affected. The livelihood of those whose business is supported by us will be devastated. We chose Kitsap county because of its rural setting and the opportunities here to own and board our horses. For the opportunity for one day owning a little piece of property to enjoy our beloved horses, chickens and goats. If we had wanted to live in the city we would have moved to Pierce County with all its crime. We enjoy the trail systems here and the friendship of the huge horse community. I ask you to consider the negative impact on the thousands of people this will affect including forcing us to move to a more horse friendly county.	Port Orchard	Washington
9/9/2025 8:37 AM	44	Patricia	Tougas	These revisions and updates would destroy the equestrian facility I have worked so hard to create. I have worked closely with the Kitsap Conservation District to develop a farm plan that is environmentally friendly and considers the rights of my neighboring properties. We have over 40 people who use our Stables for lessons and other educational opportunities. Many are young people who rely on these activities to keep them out of trouble. This farm has been in existence for over 40 years and it makes no sense that these new regulations could destroy what we have worked so hard to create. Please remember the positive impact that the equestrian community has in this county when making these decisions.	Poulsbo	
9/9/2025 8:49 AM	45	Misty	Ashbrook	This proposal will destroy the equestrian community in Kitsap county. Few boarding and training barns have the room or the money to comply with these guidelines. What will happen is that barns will be forced to close. The county conservation district is already overwhelmed. I bought my property in 2019 and tried for 6 months to contact someone from the conservation district before I finally gave up. And suddenly they are going to have enough staffing to make a plan for every equestrian facility in the county? Maybe we should talk about the specific problem these new zoning rules are supposed to address. Tell us what you're trying to accomplish, and perhaps we as a community can come up with some mutually beneficial solutions.	Olalla	
9/9/2025 9:38 AM	46			I'm not sure this is a necessary element in the rural area. This seems more important in the urban areas, specifically about encouraging gathering spaces. It seems that rural becomes synonymous with quiet, nature and independent. Perhaps the activities that lend themselves to connection should be limited to urban areas. "Provide opportunities for community gathering spaces, encourage social connection, and sustain a shared sense of rural lifestyle, while respecting individual independence." It becomes much more difficult to sustain meaningful transportation, and other services when having to focus on both urban and rural areas. Independent is a great description for rural lifestyle. Both the ag and childcare code proposed in draft seem reasonable. The horse facilities code seems to need more work. It seems that work should be done and not drowned out by the few voices in the community. Kitsap only became more equestrian oriented in the 1850s with the arrival of European settlers. This caused a change that one could argue is similar to the changes we are undergoing today. Since then lands have been "developed" to allow for horse facility needs, including the removal of trees for riding and pasture. The code should consider professional knowledge such as horse welfare groups for proper density and should work with the community on reasonable means to meet the BMPs. Parcels are of different sizes and a 200' setback on a long parcel shouldn't eliminate their ability to retain a horse operation. As mentioned above, these facilities should operate under the rules that most businesses need to be including permits for events, etc. Even more so since these operations are occurring in rural lands. It is even more important for all who live in rural lands that these businesses are set up properly. I encourage you to work with the horse facility communities to determine the best ways to meet BMPs and reasonable density.		Washington

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Date Submitted	Id	Name First	Name Last	Comments	City	State
9/9/2025 9:49 AM	47	Jessica	Light	I urge you not to adopt the proposed code change that would cripple area equestrian facilities and impact private horse owner properties. This change is not only unnecessary, it is harmful—economically, socially, and culturally. It is a step toward over-regulating, curtailing, and ultimately shutting down rural farm operations, one sector at a time. I want to speak to you not just as a taxpayer and resident, but as a woman who was once that horse-crazy little girl. Like so many others, I grew up dreaming of horses before I could even read chapter books. My first exposure to horses came not through ownership, but through small, family-run farms that offered lessons, camps, and little local shows. Those stables gave me the chance to be around horses, to ride, and to learn. Without them, my passion would have remained a daydream. The barn has always been more than a place to ride. It is where young people learn discipline, responsibility, confidence, and compassion. Horses teach lessons no classroom can replicate: how to show up, how to care for another living being, how to work hard, and how to fall—and then get back up again. For many children, particularly girls, stables are safe havens during a critical stage of development. They are places where resilience is built, independence is fostered, and lifelong friendships are formed. At a time when self-esteem and belonging can be especially fragile, the barn provides a sense of stability and community that is both grounding and transformative for young girls. The value of these facilities extends far beyond the individuals who ride. Local barns function as community anchors. They foster youth development, preserve open space, and support local economies—contributing directly to feed suppliers, veterinarians, farriers, and small farms. Unlike public sports fields or taxpayer-funded recreational facilities, riding stables operate independently, sustained by private investment from families who choose to participate. The return, however, benefits the entire community. That is why these spaces matter. Riding stables are not only places of recreation; they are places of growth, healing, and connection. They raise strong individuals, support local economies, and enrich our communities—all without imposing a burden on taxpayers. Restricting or over-regulating these facilities would rob future generations of those same opportunities. The little girls of today deserve the same chance I had—to walk into a dusty barn aisle, braid a horse's mane, and step into the saddle with butterflies in their stomachs and stars in their eyes. But the importance of equestrian facilities is not just emotional—it is economic. The 2022 American Horse Council study found that the equine industry contributes over \$72 billion annually to the U.S. economy. More than 90% of horse enthusiasts are female, meaning this industry directly supports women in sports, recreation, and business. Horses are not a niche hobby—they are a powerhouse economic driver. Sonoma State University once studied the agricultural impact of Sonoma County, and they found that the equine industry ranked second only to wine grapes in its economic contribution. That is extraordinary. And it shows that the impact of horses goes far beyond the barn. The horse industry sustains: Hay farmers, who diversify their crops and incomes by producing feed. Truck and trailer dealerships. Barn and fence builders. Feed and tack stores. Veterinarians and farriers. Local show facilities, venues, and suppliers. Unlike a bicycle, whether or not a horse is ridden on any given day, it still requires ongoing care, feed, vet and farrier services, and equipment—all purchased locally. That means constant and reliable revenue streams for small businesses and steady tax income for the county. Now let's talk about fairness. Little League baseball, soccer, and other youth sports are rightly celebrated for the role they play in children's lives. But they also rely on taxpayer-funded facilities—fields, parking, maintenance, utilities. In contrast, equestrian "little leagues" take place at privately-owned stables, maintained at private expense. They cost the taxpayer nothing. To penalize stables for the parking or noise that comes with children's sports is hypocritical. Would you consider banning Little League games because parents park on the street or kids make noise during practice? Of course not. Then why is the same activity, when it's girls riding horses, treated differently? This disparity raises uncomfortable questions. Is gender bias and indifference alive and well in Kitsap County government? Why is an activity where the vast majority of participants are female, under attack? I urge you not to adopt a code change that would endanger or restrict these facilities. To do so would not only limit opportunities for children and families, but also diminish resources that strengthen our entire community. Don't make equestrian communities extinct in Kitsap County, because that is exactly what these changes will do. Please stand with the families, small businesses, and young people who rely on these spaces, and preserve the future of our local equestrian community.	Port Orchard	Washington
9/9/2025 1:30 PM	48	LESLIE	YUENGER	Child Care Facilities Code Update: KCC 17.415.106 C. allowed from 9am-7pm. Most Child Care Facilities operate between 6am - 6pm. Expecting young children to be kept quiet until 9am is unfathomable. Request code revision = Outdoor noise from 7am - 7pm. KCC 17.415.145 A 4. Family Day Care Provider Outdoor noise allowed from 9am - 7pm to be revised to 7am-7pm. Horse Facilities 17.455.075 F 2.0 Horse focused activities take place through out the day, and the year. Horse activities occur under lights a greater portion of the year. With working families, these activities usually begin at 6pm and conclude between 9 and 10pm. County quiet hours begin at 10pm. Recommend revision of this to permit horse facility activities to take place between 7am - 10pm.// Reclassification Request Recommendation. A. RW to RC/RI SW Lake Flora Road. Approve change use from RW to RC. Nearest retail is located on Sedgewick & Sidney = 3.6 miles/7 minutes. Heading the other direction, the nearest retail is 8 miles/12 minutes at the intersection of Hwy 302 and Wright Bliss Rd NW. B. Proposed RR to RI at 25893 State Hwy 3. I support this revision with the following condition that a maximum offset from the property line is achieved and maintained with full screening by trees/shrubs on all sides. C. Proposal to develop land on the West side of Hwy 16 at Mullenix Road. From RP to RC. I do not support this. This area has multiple environmental challenges as noted, and in order to preserve the environment from manmade harm it would require an enormous amount of requirements which would never fully protect this area. Recommend to Denial.	PORT ORCHARD	Washington
9/9/2025 2:26 PM	49	Tatiana	Tuberville	The equestrian facility code change extremely limits the abilities of someone to have an equine due to the outrageous setback requirements, fencing requirements, etc being proposed in this code update. It will ruin facilities abilities to care for equines and will lead to the death of many horses who will no longer be able to be rescued from the various industries.	Seabeck	

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9/9/2025 2:27 PM	50	Court	Krumvieda	Has anyone critically examined the proposed changes to the Equestrian facility regulations? In a 5-acre square parcel, only a 66-foot square section in the center would be usable for its intended purpose. This translates to less than 2% of the area available for pasture, which seems impractical. Considering that not all lots are perfectly square, a lot that is only 400 feet wide would be entirely unsuitable for equine facilities, leaving no room for manure management areas or pastures. Is the true intention to eliminate equine facilities altogether? Small facilities rely on the ability to train and host equestrian shows to remain viable. These facilities are crucial for new and beginner riders, much like little league baseball, but predominantly for young women and girls. The economics of the equestrian world support small farms and businesses. These proposed changes could drive them out of business whenever they need to expand or adapt.	Port Orchard	Washington
9/9/2025 3:05 PM	51	Steve	Brown	Reading these comments: Your proposed language is underlined. My comments are in italics. Regarding the Horse Facilities Draft Code: 17.455.070 Livestock and Dairy management. Operators shall implement Best Management Practices for runoff, dust control, and manure handling in a farm plan as reviewed and approved by the Kitsap Conservation District. Best Management Practices according to who? If the Kitsap Conservation District (KCD) authors or maintains BMP's for runoff, dust control & manure handling they do not keep them publicly available on their website. Are you referring to the Stormwater Management Manual for Western Washington as published by the WA State Dept of Ecology? That contains BMP's on those subjects. You just need to be clear about who's BMP's the operators must adhere to. Just for continuity's sake, what you refer to as a "farm plan" the KCD calls a "farm conservation plan" on their website. KCD doesn't just review and approve farm conservation plans, they actually author them. They produce the plan for the farmer. Part of that authoring process might involve review and approval, but it's a little deceptive to suggest that they are critically reviewing and approving something that another individual or organization authored. They write those farm conservation plans. I'd be very careful about relying on the Kitsap Conservation District if your goal is environmental health, animal welfare, or neighboring property owners rights. The KCD is a farming advocacy organization. They are first and foremost about advocating for farmers rights. Not animal welfare, not environmental health, and not neighbor's rights. 1. A limit on the number of horses kept at the facility based on acreage and site conditions (e.g., one horse per one-half acre); I'm happy to see that you are setting a specific animal density of 1 horse per half acre of land. That seems reasonable. But is that 1 horse per half acre of the total area of the tax parcel? Or is it the total area available to the horse to roam (corrals and paddocks)? I assume it's the former, but it's something to think about. 17.455.075 Equestrian facilities. E. Applicants shall demonstrate that odor, dust, noise (including amplified sound) and drainage shall not constitute a nuisance, hazard, or health problem to adjoining property or uses. Best Management Practices for runoff and dust control shall be implemented. Same comment as above, who's BMP's are we talking about here? G. Farm plan approval shall be obtained from the Kitsap Conservation District. Same comment as above. KCD doesn't approve farm plans, they write them for the farmer. Better language might be....."The operator shall obtain a Farm Conservation Plan from KCD and follow the plan where it makes specific recommendations regarding management practices at the farm that if not followed, could adversely impact animal welfare, environmental health or cause a nuisance to neighboring property owners or occupants."	Bainbridge Island	Washington
9/9/2025 5:50 PM	52	Kimberly	McClure	The equestrian facilities code updates would unreasonably limit the use of land and impact a large amount of owners who have a positive impact on the lives of youth and animals. It would put numerous trainers out of business and therefore negatively impact the economy and leave both riders and horses without proper training and care. The setbacks and requirements are absolutely unreasonable and a gross overreach on use of land. Any new codes related to equestrian properties/facilities need to be made with consultation from owners, trainers, and riders in the field.	Belfair	Washington
9/9/2025 6:24 PM	53	Debra	Rogers	Hello, My name is Debra Rogers. We have been residents of Kitsap county for the last 11 years. During our time, we have enjoyed the sense of community, rural lifestyle, and the diversity of activities that our county has to offer. With the passing of the code update, I worry that the above will be acutely impacted. While I am not a horse owner, my family and I will be impacted by the passing of this change in code since we will be losing an important piece of our community and moving further away from the rural feeling that Kitsap is able to offer. Because of the accessibility to horses, my daughter has been able to develop a deep passion for them. Since age 5, she has been able to ride horses at several locations around Kitsap County. When she was young, she would write stories and act out her horse dreams with her toys. In middle school, life was turbulent, as it is for many young girls, but horses kept her grounded and gave her a sense of confidence when little else did. Now we are in high school. She is working with her trainer to move into a career in which she wants to use horses to help people who struggle with physical or mental challenges. We are still working to develop this path. Without the access to horses, none of this would be possible. ALL of the facilities she has attended would cease to exist under this bill (she has attended at least 5). She would not have been able to find this passion. She would not have had an escape when life was hard. She would no longer be able to continue lessons with her current trainers and we will be forced to pay outrageous prices as the market would be flooded with clients hoping to keep their passions alive. Recently, you asked the community to complete a Kitsap Community Survey, asking the residents what they value most about living in Kitsap. During that survey, there were a few recurring themes. One theme was a sense of community. If you have spent any time around "horse people", you'd understand the community they bring: whether it be a horse show, helping a neighbor, teaching lessons, or letting neighbors watch their horses in their pastures. Another recurring theme was housing vs open spaces. Myself and many around me value seeing livestock in our community and the rural feeling is a large part of why we moved here, and why we are working to keep it to its roots. While I understand the need for development's roots. While I understand the need for development and regulations, I urge you to consider the full impact this code will have on our sense of community, accessibility to horses, diversity of activities, and youth in our community (not all youth are sports people— some are horse people). Thank you for your consideration.	Bainbridge Island	Washington
9/9/2025 11:09 PM	54	Natalie	Fincher	I am against this proposal as it will not "enhance the rural character of Kitsap County", but it will harm local businesses and make it much more difficult for people to keep horses in Kitsap County. A lack of training/boarding facilities already exists in the area and this will exacerbate the issue: Parts of the proposal I am specifically concerned with are as follows: - Paddocks being at least 200ft feet from property line will greatly hinder people's abilities to properly care for their horses and give them adequate space to roam which is vital for their well being - Having to acquire a permit for something as simple as hosting a clinic is an undue burden and financial strain on small businesses - Requirement to prove that dust, noise, and odor should not constitute a nuisance to adjoining properties. This greatly concerns me as it appears to be a tool to discourage rural ways of living for a more urban lifestyle. I see this a tool to push out rural residents to make room for more urban neighborhoods to increase housing density in the area. - The requirement to visually screen what some might consider unsightly, ie tractors and parked cars, from adjoining properties is absolutely absurd. What is the rationale behind this amendment? This is a rural area, of course there will be agricultural and equestrian related things on their own property. If some neighbor on an adjoining property doesn't like rural living, then they shouldn't have moved to a rural area. This will affect not only new properties but also expansions of already existing facilities, threatening the livelihood of small businesses. Please speak with barn owners and equestrians that love to live and ride in Kitsap County to make amendments before passing.	Poulsbo	Washington

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Date Submitted	Id	Name First	Name Last	Comments	City	State
9/9/2025 11:25 PM	55	Pedro	Lopez	My wife, Jennifer, and I have poured our hearts and souls into maintaining an equestrian community in Port Orchard for the past 5 years. When people ask me why we own a staggering 3 stables, the answer comes straight from the depths of my being. Jennifer and I were both raised right here in Port Orchard, and she was surrounded by horses from a young age. Jennifer worked for local stables throughout her youth. As for me, my mother first introduced me to horses, by taking me to the old Triple T to help clean the stalls. Those early experiences instilled in me a deep, lifelong love and respect for these magnificent creatures. Now, as a father, I long to pass that same wonder and connection down to our children. When I embarked on this incredible journey into the equine world, I quickly realized that Kitsap County was changing and trying to move in a different direction than what I was raised in. This meant that beloved existing stables were at risk of being bought out and transformed, whether that meant bulldozing and building housing or converting them into non-equine establishments. Upon realizing this, my determination crystallized - I knew I had to act, to preserve the equestrian havens of our childhood for generations to come. My greatest hope is that our kids will have the same opportunity to learn discipline, responsibility, and forge an unbreakable bond with horses, just as we did. And so, with unwavering passion, we set out to acquire and safeguard as many of these precious facilities as possible, before they could be lost forever. For you see, the greatest charm of our beloved Kitsap County lies in its rural, lightly regulated country nature. To strip away the ability for our community to board their beloved horses would be a grave injustice, a wasteful overreach of government that cuts to the very heart of our way of life.	Port Orchard	Washington
9/10/2025 7:14 AM	56	Heidi	Ayres	Please do not agree to the changes proposed for equine facilities. Making things harder for businesses, especially ones that bring in so much revenue, is a poor strategy for economic growth. It would be wise to consult actual equine owners for any changes that should be made.		
9/10/2025 7:45 AM	57	Jim Rogers		Testing from my phone.		
9/10/2025 9:28 AM	58	Nancy	Berg	Regarding the horse facilities draft code, the setback for paddocks is very poorly thought out. A setback of 200 feet from the property line will not allow ANY horses on anything less than a five acre parcel. This whole draft code seems to be geared to getting rid of the horse owners in Kitsap County. Between the requirements in the draft code and the additional permits that will be required, you are pricing the rural residents out of enjoying our land.	Seabeck	Washington
9/10/2025 11:37 AM	59	Teresa	Case	Dear Commissioner Rolfe, Horses and barns have been a part of rural Kitsap for generations. Please consider the importance of having equine facilities in Kitsap County. Many youth and adults have enriched lives because of a horse barn or equine therapy program that supports the emotional and physical healing through partnerships with horses. In the proposed 2025 Horse Facilities "draft code" listed standards and regulations are not reasonable for horse property owners. They may not even be obtainable. Section 17.455.75: B. Barns, stables located at least 50 feet from property line. Paddocks.....200 feet from any property line. These severely limit the use of land, may make compliance difficult. F.3. Visual screening of parking areas to include tractors, trailersfrom adjoining properties. What's the harm in seeing a John Deere tractor or a Thuro-Built horse trailer? Are these codes "best practices" for equine property use or is this a response to a complaint? What are the current presenting problems these codes are trying to solve? My humble opinion, as a landowner having set up property for horses, offering resources such as the Kitsap County Conservation District on how to be the best stewards of the land is what should be supported and encouraged. Instead what I perceive as an attempt to push out Equine facilities. These codes threaten equine services. Pushing out the equine community will change the rural landscape and harm our distinctive rural character. Supporting Kitsap County equine barns, stables, rescue and therapy programs should be what guides decisions. Reach out to them, visit their places, see the wonder in the eyes of a kid or adult who has had the opportunity to be in a "better" emotional and physical state because of a horse. A concerned horse gal, Teresa Case teacase@embarqmail.com W111 UID FETCH 85557 (UID BODY.PEEK[]<0.393216>) .	Poulsbo	Washington

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Date Submitted	Id	Name First	Name Last	Comments	City	State
9/10/2025 11:55 AM	60			This is an insane attempt at controlling farmers and their livestock your proposed bill with have huge implications on livelihood and it seems you just want the money fromthe permits		
9/10/2025 11:57 AM	61	Robert	Case	For the purpose of understanding the drive behind the changes being proposed, Please advise the impetus behind the revision, specifically what has dcd discovered that currently is occurring or exists in a majority of their research that needs controlling, limiting or money charged for funding (equestrian based enforcement vs general fund deposit) Is this proposal complaint based (by what number of complaints against countywide population numbers), safety problems (specifics), demonstrated health problems (specifics), injuries (specifics) something else? Please allay the concerns that a small minority of complaints by "concerned" citizens is not driving this effort. .	Poulsbo	Washington
9/11/2025 5:32 AM	62	Lynn	Strezeski	Please don't adopt the overly restrictive proposals that target equine facilities. This is heavy handed and unfairly targets horses without addressing other farm animals and operations. This will set a precedent that will eventually be leveraged for private horse properties. I have owned horses in Kitsap County and paid taxes for 17 years. This code change would damage the rural nature of much of our county and give more room for the developers to take over. Please don't support this terrible code.	Port Orchard	Washington
9/11/2025 8:20 AM	63	Anastasia	Bidne	I am an equestrian in the community. These changes proposed set a dangerous precedent for developing land that is currently used for equestrian facilities. These changes will put people out of jobs, reduce community, and hinder the economy. I moved here recently. A major reason I moved here was because I had better access to equestrian facikitiws and communities. You would be taking that away from thousands of people.	Poulsbo	Washington
9/11/2025 12:35 PM	64	Patrick	Heye	All of the reclassification requests that the County declined to consider were residential rezones, and every residential rezone request was denied. This raises a critical policy question: why is the County refusing to evaluate any proposals that would expand the residential housing supply? The median home price in Kitsap County reached \$615,000, in July 2025, a 7% increase from the previous year alone. Average apartment rents have also risen sharply, up more than 12% year-over-year. These trends are making it increasingly difficult for residents to find affordable housing and contribute to the cost-of-live and homelessness crises. As the County revises its rezone request process, how will it ensure alignment with the Growth Management Act and the Comprehensive Plan by prioritizing single-family and multi-family housing production?	Kingston	Washington
9/11/2025 3:22 PM	65					
9/11/2025 3:34 PM	66	Denise	Drevdahl	this is with respect to the changes for horse facilities...the recommendations being made seem to have the goal of eliminating all horse facilities in the county. Given that many properties are long and narrow, 200 feet from a property line is not achievable. What problem exactly are you attempting to solve? (these suggestions made it sound like someone moved to the rural part of the county and are unhappy with the conditions that come from rural living (smells, sounds, insects, etc.). No horse facility will be able to meet these requirements unless they are located on huge pieces of property...Were horse people actually involved in any of your discussions? This is very disappointing.	Olalla	Washington
9/11/2025 5:22 PM	67	Heather	Lewis	The Horse Facility Draft Code was obviously paid for with development dollars. I ask myself, who benefits when farms have to shut down because the regulations are so unbelievably out of touch with our rural equine community? Land Developers. Well I call bullshit. We pay your salaries, too. These new rules would undermine our American Dream and whoever drafted this should be ashamed of themselves. I worked twenty years to afford my farm, specifically so I could see my beloved horse out of my kitchen window. How dare you threaten that???? I pay my taxes, I work hard for my living, and I purposely moved here to get be able to enjoy my horse(s) on my own land. Many others have inundated you with their heartfelt reasons and a lot of facts/data about how much we equine enthusiasts put into this community in terms of jobs, services, and money generated in this county, so I would encourage you to plan any future code drafts to take into consideration our community. We will fight you. You are NOT on the side of the angels, here. Please reconsider these changes and come back with something that reflects the constituents in this rural area. None of us are against clean water or reasonable modernization, but this draft is obviously written by someone who either hates horses, or someone who blithely has no clue what these new codes would mean for the small equine acreage owner in Kitsap. Please educate yourself before you try to shove this hooey down our throats. Again, we are angry. There is no wiggle room in this draft. You make us feel cornered, threatening the very reason some of us live here. Please consider doing some better outreach on how this would affect our community. Visit a farm! These properties are labors of love. Please don't threaten our dreams that we've worked so hard for; we deserve better representation than that.	Poulsbo	Washington
9/11/2025 6:24 PM	68	Anna	Van Brookhoven	I'm not going to mince words. The horse provisions are ridiculous. A 200ft setback is in the middle of a 5 acre property is so tiny that it's not even usable if you have more than a pony. This revision looks like it'll finally kill off the horse farms and riding schools for good. You say this is pro-ag? Horseshit. Go walk anyone's property and see how ridiculous this rule is. Most of the lots out here are long rectangles, not squares. Under this law, there's no way I could have my animals since the width of my nearly 5ac property barely at 200ft. Each year this county makes it harder and harder to have agriculture and is leaning more towards city planning which is going to ruin the few farms we have all for a bunch of city folks who moved out here to be closer to "the rural life"! Well guess what- taking care of animals means you deal with the horse shit. If you don't like it, don't move next to a farm. These rules are incredibly draconian towards animal welfare- horses need space to roam and with the odd shapes of many lots here and wetlands you really gotta work with what you got. 50ft setbacks means my horses would be in cubicle-like pens which is not cool. Leave the laws the way they are and let me know who thought this was a good idea so I can have y'all out to get actual eyes on the situation see what a burden this will be.	Port Orchard	Washington
9/11/2025 6:26 PM	69	Julie	Toulon	This is asinine! For example, we have 15ish acres, if we wanted to board a horse or two we would not be able to as the width of our parcel is only 300ish feet. With setbacks our barn and pastures would be in violation. We have 4 horses currently as well as a couple cows. We have a farm plan w the conservation district, have a manure storage/composting structure and do a good job not overgrazing our pastures or spreading raw manure to runoff into Olalla creek. We would need to hide our tractor, and horse trailer as to not offend our neighbors as well... make it make sense! We are only ONE example hundreds with similar property limitations.	Olalla	
9/11/2025 6:59 PM	70	Laurie	Kallsen George	Please define how you dictate an existing or established equine facility. Is this based on what data? Looking to the concept of change in use ; if a barn has existed for 20 years and has historically had boarders and occasionally has lessons, who determines that it is a boarding or lesson facility	South Colby	Washington
9/11/2025 7:54 PM	71	Kaleena	Pluff	I don't think any barns or riding facilities should be shut down. A lot of these have a good impact on kids and achieving goals out of this world. Especially the riding pony club centers	Bremerton	Washington

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Date Submitted	Id	Name First	Name Last	Comments	City	State
9/11/2025 10:38 PM	72	Carrie	Guthrie-Whitlow	As 32-year residents of South Kitsap county, we are deeply troubled by the proposed changes to the agricultural code would significantly alter the landscape and negatively impact the deeply rooted equine culture that exists within our community. The earliest recorded written history related to horsemanship is from 400B C by General Xenophon, some 2400 years ago. General Xenophon references books even older than this by Simon and Plinius. Alois Podhajsky, former director of the Spanish Riding School in Vienna , Austria, speaks the culture in his book, The Complete Training of Horse and Rider In the Principles of Classical Horsemanship: 'The historical development of riding reveals that the art is not confined to any special country. It flourishes whenever human beings dedicate themselves to horsemanship and know how to cultivate and develop its practice, wherever there are experts, and wherever such skill brings pleasure to those who love beauty. The art of riding is indeed international; it belongs to the civilized world, and it is the duty of every nation to preserve and foster it in the interest of culture'. The proposed changes are certainly not fostering the equine culture, and in fact are seen by most within the community as an attack on the culture. Some have suggested that the proposed changes is a money grab on the part of the county due to the funds that would be generated from permits required for boarding and training facilities along with one time permits for shows and other events. However, we believe that this goes much deeper, as it seems the cost of oversight required to oversee these regulations could well exceed any revenues brought in. If the Equine Center Standards and Regulations are adopted, many if not most of the existing facilities (large and small) will be lost. Proposed changes such as the requirement that 'paddocks and manure storage or disposal area shall be located at least two hundred feet from any property line' is not physically possible for many, if not most facilities, within the County. For example, a 200' set back is impossible on a rectangular shaped 5-acre parcel, measuring 330' wide by 660' wide, and would therefore prevent a facility from being permitted. The 'requirement for visual screening of parking areas, manure storage or disposal areas, and storage area for mechanical and transportation equipment (e.g. tractors, trailers, storage pods) from adjoining properties' – What does this even mean? Are you suggesting we build privacy fences around our properties, so people don't have to see us? We are concerned that there is a vision of South Kitsap County that is not being shared with it's citizens. It is clear from the recent development of apartment complexes along Sedgwick, Bethel and Mile Hill, and housing developments west of 16 that the untold vision does not align with what many if not most of your long-term residents had imagined for the future of our county. While allowing this building to occur, the county has failed to upgrade the infrastructure (ie. Roads) that are needed to withstand the increased population. Are you simply trying to drive out the equestrian community so that you can have more land to develop in the future? Who and what are driving this narrative and to what end? This is clearly an attack on the equine community and the culture that exists within it. We propose that before considering changes to the agriculture code, you seek counsel from experts within the community who will have a better understanding of the implications of such changes and can help guide the county regarding any future changes to this code.	South Colby	Washington
9/12/2025 6:06 AM	73	Catherine	Schwartz	I attended the 9/11/25 Year of the Rural Project Presentation and Open House. I agree with others that it was offensive and in poor taste to schedule a public meeting on 9/11. My other observations. That the entire horse facilities code changes were concocted without input from anyone with any fundamental understanding of equestrian operations or its economic, health and social impacts. The 200 ft setback requirement for paddocks is a complete fabrication. Horses are livestock and are a vital and vibrant part of a healthy rural economy. The economic impact of the horse industry has been proven to be substantial nationally with its greatest impact in local rural areas. The draconian code changes affecting horse facilities were driven by one situation involving one horse facility. And that problem has less to do with the horse facility than it does private road issues for which the horse facility is being blamed. The code changes would forever and dramatically change Kitsap's rural landscape and economy while not even fix the precipitating problem. The planning and permitting process in this county is broken and dysfunctional. This isn't the USSR. It should not take years to get building permits or Conditional Use Permits approved. County employees have no business capriciously demanding studies and other obstacles not based on a real need. They're running roughshod over taxpayers treating rural residents like the enemy. Staff should be held accountable for timely permit processing or fired. An immediate audit of all pending permits should be conducted and those over a year old should be approved without further delay. My husband and I have lived in rural areas in 3 different states besides WA. Few permits were required at all, and a 2 week turn around was the norm. Something is very wrong in Kitsap County. All the proposed code changes affecting equestrian operations need to be discarded. A working group of experienced knowledgeable horse facility owners, trainers and horse owners needs to be involved to draft only those code changes proven necessary. Code changes protecting equestrian operations need to be adopted. It's impossible at this time for anyone to know how long that will take. But it needs to be done right and not rushed. A working group of rural & farm businesses needs to begin work on guidelines for the county to follow to support agri business and agri tourism, of which equestrian facilities are a part. Guidelines protecting rural residents and their hobby farms and animals from frivolous complaints by urban neighbors are needed. Urban residents moving to rural areas need to sign disclosures when they purchase property in rural areas that in doing so they accept that smells, noises and farm equipment are a part of rural living. The county should push back on frivolous complaints.	Bremerton	
9/12/2025 10:24 AM	74		Coreys	ACUP or CUPs should be applied to horse boarding facilities on Private shared roads. Facilities directly off public access roads would have minimal to no impact on surrounding properties.	Silverdale	Washington

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Date Submitted	Id	Name First	Name Last	Comments		City	State
9/12/2025 10:31 AM	75	Stefanie	Olson	I attended the meeting last night regarding equine proposals and was amazed that there has been no input from the equine community and that a member from the conservation district were not invited into this discussion before it exploded to the community. Dianne Fish is a great resource and is very informatinve as well as several in our equine community. I feel as though the speaker learned a lot last night and at times was a deer in the headlights. There is so much more to this then sitting around a table. Have you considered visitng some equine facilities, do you know how big horses are and have you researched the space a horse needs and how much space is needed to store supplies for an animal farm?? I believe there is a lot more work to be done and that your timeframe will need to be expanded. In no way has anybody I talked to heard of Year of the Rural. Do you know that horse people are not spending time in front of their computer they are outside and to assume everyone checks the county website is absurd and I believe if it is only 10k to notify the residents that you should consider that instead of taking peoples rights away and making more money for the county. You cannot tell me that you are not raking in the money, look at all the building going on and it is NOT affordable housing, it is thousands apartmentts going up off farms on Clear Creek that have been there from the time began until the last couple years and then the projects in wetlands off Hwy 303 and all the building of Apex and Dickey road and more. this also shows the lack of knowledge in the horse community. They are not video gamers and glued to electronics all the time. These are hardworking people who can be known to put in 16 hour days and are on call all day every day. My son was a well respected horse trainer in the area who ran an equine facility in Kingston and has recently relocated to Texas as Washington state is not affordable and these proposals are only going to drive residents away. I am convinced you have not looked a the cost of a performance horse or the cost of upkeep of a horse and now the county wants a bite of the apple too. All of this being driven because o ONE facility and ONE foul mouthed neighbor who stands up and flips someone off and says f***k you to another participant and then is humble and says she doesnt act this way and her emotions get the best of her. the emotions get the best of her quite often as she drives down the private road screaming at people you boarders fu**ing suck! This is out of control and this is why our world is out of control because nobody can step up and deal with the problem people. The farm in question has been an equine facility for more YEARS than most of you have been alive until sold and the family moving to TEXAS. The new farm owner has commercial buisnesses running out of her farm and I dont believe it is zoned commercial. We need protection in this community not a government that cannot stand up and take charge. I am sure ther eare violations that can be dealt with but the county is so soft that when they talk to the property owner she thinks you are on her side. Kitsap County needs to step up and give violations to violators! And it is obvious the neighbor is also out of control and has anger issues and is harrassing people who arent even owners of the property! I am worried about this little neighborhood with these neighbors as one neighbor is clearly unstable and it worries me what might happen to anyone on that road. I am not on either side of this situation but I am worried about all of it.		Silverdale	Washington
9/12/2025 1:40 PM	76	Deborah	Anne	UNplan the equestrian land use changes for Year of the Rural 2025;		Suquamish	Washington
9/12/2025 2:06 PM	77	Darby	Evans	My name is Darby Evans. I have lived in Kitsap county since I was 3, which is 44 years. Kitsap County has always been beautiful country ano rural. I use to ride my horse down the side of the road back in the day and still continue to ride my horse at Banner Heritage Park. I have seen how much this county has changed, and it makes me sad to see. There have been so many old farmhouses, pastures and forested areas that are now paved over shopping centers or apartments. There are housing developments on Sedgewick, Mile Hill, Bethel Rd, and in front of where I live. It use to be forest and pastureland. There is also the proposed logging of Banner forest at the same time. It seems there is a deeper agenda here, trying to drive out equestrian properties and farms so there can be more housing developments instead? I worry that the county is more concerned about money than preserving the history, rural areas, and equestrian communities here. I have read the new proposed agriculture code changes and they are absolutely ridiculous. I don't understand why we need 200 foot setbacks for paddocks and manure piles? 50 foot setbacks for barns? 1 horse per 1/2 acre (when California has 8 horse per 1/2 acre.) I attended the meeting on Sept 11 and she stated 75% of the properties are 5 acres or under. Implying it would be impossible to meet the standards of new and future horse boarding and training facilities. They would have hardly any property that is usable for horses or possibly none at all. It was also stated that this stemmed from one complaint. They stated horse barns are noisy, create traffic and smells. Well what about apartments and housing complexes? Aren't they noisy and creating more traffic when there has been no updates to the road infrastructure? I have apartments built right behind my backyard and the light pollution is awful. I had to get blackout curtains. There is constant noise and traffic driving through at all hours, but the county is more concerned with noise at horse barns? What noise do horses make? When asked how many complaints there were in the past 10 years, they didn't know and couldn't answer the question. It seems to me this one civil matter has blown up to affect all of the equestrian community, even those who are not doing anything wrong. This all could have been handled much differently. There are also permits required for training, clinics and events. Why? Permits take a long time to acquire, are costly and will discourage people from having any kind of horse events because of the added time to acquire them and costs. Do you know that horses are proven therapeutic to troubled teens and veterans with PTSD? That horse therapy helps with mental health and gives kids and adults a healthy sport and activity to do? It teaches empathy, patience, confidence and responsibility. I can't think of more healthy activity for kids and people young and old. Why would you want to make these activities harder to have and attend? I can't only think if the equestrian community is driven away how many kids will turn to other unhealthy activities and drugs instead. Please consider the impact this will have on mental health. Most people that live in Kitsap county live here for the rural land and beauty, we need to preserve that and the equine community and farms. Take that away by adding these insane proposals and people will not want to live here. I am currently looking to buy horse property here in Kitsap, but if these code changes go into effect I will not buy property here and will move elsewhere. Please do what you can to stop this from happening and do what is right for this community. Thank you for your time, Darby Evans		Port Orchard	Washington
9/12/2025 3:39 PM	78	Trish	Tougas	I faced a similar situation as the dispute that led to these revisions and was told that the county could do nothing about it as it was on a private road. The county told me it was a civil matter. Why is this different. In my opinion this is a civil matter that the court should decide and not something the county should be involved with by revising regulations that will make it even more difficult for farmers in the future.		Poulsbo	
9/13/2025 1:22 AM	79	Lauren	Rogers	Washington law recognizes equestrian centers as part of agriculture. RCW 7.48.310 protects routine farm activities—including livestock husbandry, animal movement, and construction/maintenance of barns and fences. Under RCW 7.48.305, compliant agricultural activities are presumed reasonable and “shall not be found to constitute a nuisance,” and they may not be restricted to certain hours simply for being farm activities. The Growth Management Act requires counties to conserve agricultural lands and discourage incompatible uses (RCW 36.70A.060, .170) while using innovative zoning to maintain farm viability, including allowing accessory uses and agriculturally-related experiences (RCW 36.70A.177). The Open Space Taxation Act treats land devoted to livestock production as farm and agricultural land (RCW 84.34.020), and state guidance allows compatible incidental uses that help farms survive. Finally, state policy assigns conflict management to buyer disclosure near farms (RCW 64.06.022), not new limits on ordinary agricultural operations. For these reasons, the proposed restrictions on boarding numbers, training/lesson frequency, equestrian events, arena hours, and routine farm infrastructure risk conflicting with state law and undermining agricultural viability. Please revise the amendments to treat equestrian centers as agricultural or agricultural-accessory uses and to adopt viability-supporting standards that are consistent with RCW 7.48 and RCW 36.70A.		Port Orchard	Washington

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Date Submitted	Id	Name First	Name Last	Comments	City	State
9/13/2025 5:16 AM	80	Heidi	Scott	I wanted to follow-up with you regarding the draft changes to the child care section of the document you shared. I'm hoping that there will be consideration to change the language of "Family Day Care". We in the early education field are trying to move away from "daycare" as it historically (incorrectly) connotes a perceived lower level of provider education and quality care. Also, in the interest of maintaining continuity with DCYF licensing and Child Care Aware of WA, it might be best to use existing terminology, which currently is: From DCYF WACs: "Family home early learning program" means an early learning program licensed by the department where a family home licensee provides child care or education services for 12 or fewer children in the family living quarters where the licensee resides as provided in RCW 43.216.010 (1)(c). Our program, Early Achievers, uses "Family Child Care" or "FCC", which is a term also used by DCYF Licensors in conversation. I think either one would be acceptable Please let me know if you have any questions about this. Thanks! Heidi Scott She/her pronouns Early Achievers Consultation Manager/Lead Child Care Action Council 3513 NW Anderson Hill Rd. Silverdale, WA 98383 (360) 731-3656	Silverdale	Washington
9/13/2025 7:29 AM	81	J	Goss	Subject: Strong Opposition to Proposed Equine Property Code Revisions Dear Commissioner, I am writing to strongly oppose the proposed code revisions affecting equine properties. This is not about a driveway dispute — it is about setting the stage for urban expansion into rural areas. The county's own presentation made that clear, pointing to targeted development zones and long-term housing projections. With a \$20 billion shipyard expansion already underway and our power grid at capacity, it is obvious that farmland is being eyed for future development. The stated concerns about dust, noise, and environmental impacts on equine properties are inconsistent. Baseball fields, sports facilities, and new housing developments create far greater impacts, yet they are not being scrutinized. The proposed permit structure is unworkable: \$8,500 for boarding, \$8,500 for training/lessons, and \$8,500 for shows/events — on top of mandatory Conservation District site plans that many, including myself, have been unable to obtain for years. These excessive costs and delays will shut down small equine facilities like mine, where I keep seven horses and teach lessons to children. This proposal is a direct threat to rural life, agricultural tradition, and property rights. I urge you to reject it. Respectfully, J. Goss	Port Orchard	Washington
9/13/2025 7:38 AM	82	Margaret	Mittuch	The proposed code updates for Equestrian Facilities do not represent a clear or fair understanding of the equestrian industry or facilities as they currently exist. I urge the council to slow this process down, follow through with engaging subject matter experts that are involved in and understand the many aspects of boarding and training and equine care facilities, and work to update the code in a way that fairly serves the interest of all of our constituents. There were any voices at the September 11th meeting, all with comments that were "noted". I hope "noted" means that they will actually be considered. The balance of feedback was against the code as proposed. That proposed language was dated from 2016, when it was not passed. Prior efforts to pass similar code in the early 2000's also failed. No economic impact study has been completed that we have been made aware of, which is a critical piece of information that needs to be included in any deliberations. Shutting out and causing the close of equestrian operations in this county would be devastating. The community does not trust the motivations of the County, and that fact needs to be recognized.	PORT ORCHARD	Washington

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Date Submitted	Id	Name First	Name Last	Comments	City	State
9/13/2025 8:01 AM	83	Lisa	Pagano	This is a code change that will ruin your county and force equine stables out. If this passes no one will want to move there due to the restrictions. Dozens of stables will be forced to close. An unfair decision from an unfair person who goes not understand what rural means.	Eatonville	Washington
9/13/2025 8:39 AM	84	Amirah	Rogers	I am writing to express my strong opposition to the proposed zoning code revisions for equestrian facilities in Kitsap County. While I understand the County's intent to update and clarify regulations, these changes pose serious risks to our agricultural community, our equestrian traditions, and the broader public who depend on them. Washington State law is clear: farming is a protected activity that includes the commercial production of livestock and equestrian uses. Under the Washington Right-to-Farm Act (RCW 7.48.300-.320), farms are shielded from restrictive regulations that interfere with normal and accepted farming practices. Additionally, RCW 84.34 establishes that farms do not need to meet arbitrary acreage thresholds to be recognized as legitimate agricultural operations. By imposing zoning requirements that exceed what state law defines as farming, Kitsap County risks undermining the intent of these statutes. The suggestion that current equestrian facilities will be "grandfathered in" does not resolve this issue. Grandfathering only protects the present; it blocks the future. If new farms cannot be established, our community loses the ability to grow, evolve, and pass on land-based traditions to the next generation. This means fewer opportunities for young farmers and equestrians, diminished local food and horse-related economies, and weakened resilience of our rural heritage. Equestrian facilities are not just farms. They are gathering places, youth education centers, therapy providers, and safe spaces for community connection. They contribute to mental health, recreation, and local identity. Restrictive zoning policies will make them financially unsustainable, discourage investment, and ultimately drive families out of farming and equestrian life. As a community member, I urge Kitsap County to withdraw or significantly revise these proposed changes. Instead, I encourage the County to align its zoning code with the spirit of Washington State's farming protections—supporting small farms, equestrian facilities, and rural livelihoods, not restricting them. Our equestrian and farming communities are part of the cultural and economic fabric of Kitsap County. Please do not adopt policies that unravel them.	Port Orchard	Washington
9/13/2025 10:04 AM	85	Tracey	Dimof	NOTE - MORE TIME IS NEEDED FOR THE EQUESTRIAN AND FARM COMMUNITY TO GATHER, COLLECT OPINIONS, PROVIDE DATA ON THE POTENTIAL IMPACT IF THESE AMMENDMENTS ARE APPROVED! IT TAKES TIME TO RESEARCH AND CLEARLY THE COUNTY HAS QUIETLY BEEN WORKING ON THIS FOR MONTHS OR YEARS!!!! IT IS NOT ACCEOTABLE FOR THE COMMUNITY TO FIND OUT 10 DAYS AGO ON FACEBOOK! I am writing in reference to the proposal for an amendment to the county code and zoning regarding Equestrian Center Standards and Regulations. The proposal and the impact of the changes if approved would effectively force the closure of many wonderful equestrian facilities that are part of the fabric of our rural community in Kitsap County. The proposed changes would make it almost impossible for equestrian facilities to comply as they are so restrictive and not practical, and for many the cost of even attempting to make changes so that they comply would be too great. My husband and I moved to Port Orchard over 9 years ago from Southern California where we had horse property in Norco (1 acre), to our beautiful home on 2.5 acres in Port Orchard. I volunteer and sponsor a horse at The Whole Horse Place in Port Orchard and I cannot say enough about the value of their programs to children who want to learn about horse care, horse management, and riding, to kids with special needs, to at-risk youth, and to veterans and recovering addicts as part of their therapy. My experience at The Whole Horse Place as an adult whose horses passed in 2021 and 2022 has been in many ways life-saving due to the therapeutic value of supporting and volunteering and riding at The Whole Horse Place. As a young girl growing up in England I was fortunate to have parents who somehow were able to pay for riding lessons for me at age 5. Riding and horses have been a constant in my life and as a teenager it helped me build confidence and self worth and kept me on a good path as my love of horses was so strong, all I wanted to do was ride which you can imagine keeps young people out of trouble! Horse barns and facilities are very often safe havens for young people, and I implore you to please don't underestimate the value in that. Kitsap is a wonderful community and we are so fortunate to have so many amazing equestrian facilities. It would be such a travesty to see them go if they were unable to survive. They also bring in revenue to the county not just in lesson and boarding fees from taxes but supporting local feed and tack stores, veterinarians, farriers, and trainers. The rural lifestyle we experience in Kitsap County should be highly valued and protected. There are few places left where horses and equestrians are as much a part of the community as private homes and farms. If the proposed changes were approved and implemented it would be devastating to this special community. Please consider the proposal very carefully and think about the legacy you want to leave for Kitsap County. Do you want to pass this potentially devastating proposal for change and in 10 years for Kitsap to look and feel like King County, or do you want to be known for protecting this wonderful rural county so that it continues to thrive as it is today, as a rural, equestrian loving community with protections to preserve that way of life for the next generation? Thank you for reading and taking my comments into consideration. With best regards, Tracey Dimof 4891 SW Daisy Street, Port Orchard, WA 98367 traceydimof@gmail.com	Port Orchard	Washington
9/13/2025 1:12 PM	86	Tiffany	Santinelli	Horses are a huge part of our community... They help with depression, stress, our vets, special needs and so much more...	Kingston	
9/13/2025 2:01 PM	87	Matthew	Scott	As a customer that has been going to Yoked Brewery since they oped there business and an avid supporter of small business business I would like the code updated. This include there business to serve 16 ounce pours of there product and serve food to there customers. I feel this would benefit not small businesses like Yoked Brewery, but the community as a whole.	Port orchard	Washington
9/13/2025 2:14 PM	88	Terra	Scott	I would like the code updated. This would benefit small business like Yoked Brewery by letting them serve 16 ounce pours. I like to support and seek out small business like Yoked Brewing and I feel I am not the only one that does in Kitsap County. With that said it would also benefit the community as well.	Bremerton	Washington
9/13/2025 5:13 PM	89	Stephanie	Secrest	We need to preserve and protect our farms. Please be thorough in addressing these complaints and aware of when they were made. We need farmers, we need places that offer equestrian type things. Don't punish all the facilities and farms for one facilities mistake or negligence	Poulsbo	Washington
9/13/2025 7:07 PM	90	Rosemary	Collins	There has not been a vote of the people. Why is the county managing land that is not owned by them? Why is the county involved in my ownership of horses and equestrian activities? I pay the taxes on my property and I pay the mortgage...the county needs to stay out of managing my property.	Olalla	Washington
9/13/2025 9:21 PM	91	Erin	Woodell	My daughter has benefited greatly from having the opportunity to train with horses at our neighbors property. This might be at risk if this measure passes for future children. Being able to learn lessons that can not be spoken is something that can only be taught by horses.	Olalla	Washington
9/14/2025 9:30 AM	92	Tracey	Hamilton	Tracey Hamilton check out my recent comment at the bottom. Also: HOW CAN YOU HELP??? The equine Community is trying to unite on one front to get the Horse Facilities Draft Code pulled from the Rural Zoning Code Amendment Package. The best place to start is by flooding their inbox. We are in the middle of creating a petition, which will hopefully be out by Monday. BY Commenting (and asking EVERYONE you know to comment the SAME THING) on the county website with the following: Ask: What problem is the county trying to solve? Urge: More time Horse Facilities Draft Code is pulled from zoning code amendments package	Kingston	Washington

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Date Submitted	Id	Name First	Name Last	Comments	City	State
9/14/2025 10:58 AM	93	Steven	Arntson	I'm not a professional in this arena, and I thank you for giving the public the opportunity to comment. My thoughts are general, because I'm not a development professional, but it does seem that such professionals sometimes have an outsized voice in developing policy. Nothing against them; everyone's got to make a living. But my stake in my own environment is that I want Kitsap County to be environmentally resilient, and a healthy place for its residents. There are lots of components to this, of course, but my comment today has to do with preserving big trees and growing more of them, especially in town and city centers. Seattle's own tree ordinance is not on track to meet its own goals. How do we in Kitsap maintain and increase the presence of large trees and the shade and other environmental benefits they confer? Some people have the erroneous impression that large trees are primarily dangerous and inconvenient. This is incorrect. Large trees are primarily beneficial, even essential to healthy living in Kitsap County. It takes 100 years to grow a big legacy Douglas fir; let's work to preserve the few we have left in our population centers, and start planting. Thank you.	Kingston	Washington
9/14/2025 2:05 PM	94	Eric	Parish	Equestrian setback and County permits - NO! Hard NO! The proposed benefits for these measures are greatly outweighed by the hardship that will be imposed on the horse farms. The setbacks and licensing requirements proposals should be voided.	Port Orchard	Washington
9/14/2025 3:31 PM	95	Sean	Lane	Please reconsider changing the code regarding equestrian stables. This is unrealistically restrictive as it would require stables to be built in the center of the property. Not a good place for stables on any property.	Port Orchard	Washington
9/14/2025 5:23 PM	96			The proposed zoning amendments threaten accessibility to equestrian activities for children and adults who otherwise could not experience horses. Many facilities provide affordable lessons, leasing programs, and opportunities to care for and ride horses without the burden of full ownership. These services are crucial for fostering empathy, responsibility, and engagement with rural culture. Washington State statutes (RCW 36.70A.040 and RCW 7.48.300-.310) support agricultural uses and encourage counties to conserve farmland and agricultural operations. Equestrian facilities qualify under this definition, and restricting them would violate both the letter and spirit of these laws. The Rural and Resource Lands Element further emphasizes promoting rural lifestyles and ensuring that agricultural opportunities remain accessible. Removing or restricting these facilities would disproportionately impact low-income families, children, and individuals who benefit most from affordable agricultural and equestrian experiences. These barns provide a sense of community, education, and belonging that cannot be replaced by other recreational activities. I urge the Board to oppose these amendments to ensure equitable access to agricultural and equestrian opportunities in Kitsap County.		

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9/14/2025 6:46 PM	97	dianne	faletti	Please leave equestrian facilities to stay put	Silverdale	
9/14/2025 7:34 PM	98	Adrienne	Denges	As someone who grew up around & worked with horses for a majority of my life, I can tell you that equestrian activity has a massive impact on local families and youth. What problem is the city trying to solve with the code updates? Kindly requesting that the Horse Facilities Draft Code is pulled from zoning code amendments year of the rural package and looked at separately.	Poulsbo	
9/15/2025 10:30 AM	99	Maureen	Halligan	The draft document includes both equestrian facilities and accessory facilities. The setback requirement for barns, paddocks and manure managment would make it impossible to function with anything less than 10 acres that are perfectly square. With that you would be restricted to the middle 2.5 acres or 25% of your property. If you are also needing setbacks from wells, septic fields and streams it would make most of our small farms impossible to farm. Also with this, what about donkeys. Mules, llamas and alpacas? Are they next? Finally the state RCWs are pretty clear about agricultural use, accessory use and the obligations of both owners and counties. This draft is not in alignment with the RCWs. The contribution to the Kitsap County economy from various equestrian facilities must be significant. In Clarke county the estimate is \$90M annually. We have probably 5-10 times the numbers they do. Please redraft this update or leave it as it was before. Most of us work with the Conservation district on an ongoing basis for land management.	Bainbridge Is	
9/15/2025 10:59 AM	100	GEORGE	CAMPBELL	These updates are not good for anyone, so many of our kids and grandkids rely on these small farms for their horses and arena's. these changes will make it so no one can afford horses. Please leave keep this county horse friendly.	Bremerton	Washington
9/15/2025 6:59 PM	101	Lee and Stacy	Linton	We support Kitsap county restoring the regulations and oversight over Equestrian Centers (formerly termed Commercial Stables) that was removed by the adoption of an Agricultural Code back in 2016. Equestrian Centers are a high impact business on the surrounding neighborhood, and as such they require oversight and review to ensure the proposed location has adequate infrastructure to support it's operations in a safe and equitable manner. We have experienced first hand what the lack of oversight can mean to a Rural Residential neighborhood after the Condition Use Permit (CUP) process was removed by the Agricultural Code, and a Equestrian Center was established on our private single lane easement without our consent. Among other issues, it has created a safety issue with inadequate ingress and egress to our properties, which is extremely concerning regarding the access for ambulances, fire trucks or if we need to evacuate in the event of a forest fire. We firmly believe that protecting the rights of the many over those of the few is the role of government as so elegantly stated in the Kitsap County Mission Statement, which reads as follows: "Kitsap County government exists to protect and promote the health, safety and welfare of all County residents in an accessible, efficient, effective and responsible manner." In closing, we urge you to hold firm and do what is right by all citizen of the county, thus preventing a reoccurrence of this issue in another neighborhood. Thank you.	Silverdale	Washington
9/15/2025 7:03 PM	102	Paula	Scott	I urge the Commissioners to take into consideration that all property owners have rights. The impact on homeowners living on private roads serving more than one property need to be taken into consideration. Horse boarding facilites on private roads serving more than 1 property should be subject to conditional use permits.	Silverdale	Washington
9/15/2025 7:04 PM	103	PaulaScott		This process is confusing and not friendly. One cannot see all their comments, edit or add on until submitted.	Silverdale	Washington
9/15/2025 9:47 PM	104	Colrain	Fragoso	This is a horrifying overreach and will cripple all equine facilities in the county, as well as destroying home ownership by private horse owners on small acreage! Leave our homes and facilities alone!!! This looks like a broad overreach of officiala to force out rural families in order to make room for housing developments!	Port Orchard	
9/15/2025 9:52 PM	105	Christina		I disagree with the new horse facilities draft code. The 200 foot setbacks and regulations will make it impossible to have hobby farms and horse facilities. These setbacks will prevent anyone that has property from using it how they want. Farms help keep kids out of trouble. There's not enough options for youth especially in South Kitsap. Why are you trying to ruin peoples' lives? It will cause people to lose their identities, their hobbies and their future. Not everyone wants to live in suburbia. Please reconsider these outrageous rules. King county doesn't even have this strict of rules nor do any of the surrounding counties. You're going to drive people out of Kitsap county. People want to be left alone and live their lives in this beautiful county that it is now. Please reconsider loosening these rules. All Kitsap seems to care about is money and big conglomerates that allow them to fund their ideas. They don't care about the smaller taxpayers that live here and want a brighter future for their kids and families. Thank you!		
9/15/2025 10:08 PM	106	Richard	Polston	As a local small business owner and retired Navy veteran, I know how much our barns and horse programs mean to the community and the local economy. We have had military veterans, federal government workers, state government workers, veterinarians, veterinary techs, and Kitsap County Sherrifs wives as boarders. Limiting business times to these individuals would be detrimental to these individuals and their horses due to the volatility of their professional employment schedules. In turn this would be detrimental to their mental health, due to their inability to interact with their horses, and to the health of their horses because a horse needs a "job" to stay in physical shape and aid it's mental health. Please consider the broader impact of these changes. Just one of the proposed changes —the 200-foot setbacks— would single-handedly eradicate equine businesses in Kitsap County. Under these restrictions, a five-acre farm could not keep a single horse, and even a ten-acre property would be limited. This single proposed change would make it impossible for an equestrian business to operate in Kitsap. The additional proposed language also poses immense threats to the survival of our rural economy. Realistically, no equestrian facility could survive under the setback and acreage restrictions. If these zoning changes move forward, Kitsap County will not just lose equestrian facilities, which serve the community in so many ways—it will also devastate an entire economic sector. Boarding barns will close, the few that remain will be forced to slash capacity, increase boarding rates, and displaced horses will take with them the revenue that sustains local farmers, hay and grain suppliers, local veterinarians, and farriers. Veterinarians, trainers, tack shops, bodywork professionals, and farm stores will watch their business evaporate as horse owners are pushed into neighboring counties. Meanwhile, those counties will collect the gas sales, restaurant traffic, and housing revenue that Kitsap willingly gave away. The message to equestrian families is clear: you are not welcome here. And when they move, they take not only their animals but also their tax dollars, their home purchases, and their community investments with them. Kitsap leadership will be responsible for driving out a vital rural industry and handing its economic future to surrounding counties.	Port Orchard	Washington

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9/16/2025 5:15 PM	107	Valerie	Wittwer	By trying to remove equestrian facilities, lessons, boarding and training from Kitsap code 17.415 and creating into its own definition 17.455.75 you are purposely trying to go around state growth management act. RCW 36.70A.011 rural land, it expressed intent is to retain, enhance, create, and permit rural businesses. The horse industry is rural! It expressly states to permit the operation of rural based agriculture. The state defines agriculture activities as a "farmland" devoted for commercial purposes of livestock. Livestock is defined as horses, mules cattle, sheep, and "farm product" lists recreational equine use. The Growth Management Act states counties should foster land use patterns and develop a local vision of rural character. How much more rural do you get with horse ownership? Perhaps move horses to the commercial zones? You should title your Kitsap County Zoning Code Equestrian Center Standards and Regulations to Kitsap Zoning Code How To End All Equestrian Operations. Your revision of code is so blatantly obvious that your intent is to end horse ownership in the county. Why is the county going after horse businesses? Per your draft proposal 2. barns and stables shall be located at least fifty feet from any property line. Paddocks and manure storage shall be located at least two hundred feet from any property line. 1. A limit of on the number of "horses" kept at the facility. 2. Hours of operation 3. A requirement of visual screening of storage for mechanical and transportation equipment e.g. tractors, trailers. And of course, your clavate 4. Other restriction, mitigations and regulatory compliance measure a necessary to protect the public health, safety and welfare. Where in ANY of the draft even remotely complies with the state directive to, retain, enhance, create and truly permit equestrian facilities the state's intent of what is considered agriculture? My direct neighbor owns a cattle business, apparently, he does not have to meet any of these codes because he has cows. He can place his tractor in clear view of my property; he can keep as many cows on his property as long as he figures it's in his best management practice. No setbacks, no restrictions on hours of operation. No CUP, no ACUP for him because again he has cows. He keeps his cows in a paddock that is directly ON the property, he parks his trailer feet from a property line in clear view. This point clearly demonstrates this is an attack on horse ownership and equine businesses. Yes, your fall back on these requirements is it only apply to new facilities right up until the county activates: 4. Other restriction, mitigations and regulatory compliance measure a necessary to protect the public health, safety and welfare. Imagine a future person who would like to operate an equestrian facility in Kitsap, these draft code changes are directly created to discourage and make it too expense to operate an equine business. This will open larger sections of land as properties sell and allow for more development. This has a feeling of a type of for-profit construction companies influence and or a well-connected resident. No portion of your draft code proposal is acceptable, delete all of it! RCW 36.70A.011 Findings—Rural lands. The legislature finds that this chapter is intended to recognize the importance of rural lands and rural character to Washington's economy, its people, and its environment, while respecting regional differences. Rural lands and rural-based economies enhance the economic desirability of the state, help to preserve traditional economic activities, and contribute to the state's overall quality of life. The legislature finds that to retain and enhance the job base in rural areas, rural counties must have flexibility to create opportunities for business development. Further, the legislature finds that rural counties must have the flexibility to retain existing businesses and allow them to expand. The legislature recognizes that not all business developments in rural counties require an urban level of services; and that many businesses in rural areas fit within the definition of rural character identified by the local planning unit. Finally, the legislature finds that in defining its rural element under RCW 36.70A.070(5), a county should foster land use patterns and develop a local vision of rural character that will: Help preserve rural-based economies and traditional rural lifestyles; encourage the economic prosperity of rural residents; foster opportunities for small-scale, rural-based employment and self-employment; permit the operation of rural-based agricultural, commercial, recreational, and tourist businesses that are consistent with existing and planned land use patterns; be compatible with the use of the land by wildlife and for fish and wildlife habitat; foster the private stewardship of the land and preservation of open space; and enhance the rural sense of community and quality of life. RCW 7.48.310 Agricultural activities and forest practices—Definitions. For the purposes of RCW 7.48.305 only: (1) "Agricultural activity" means a employment and use of labor; roadway movement of equipment and livestock; protection from damage by wildlife; prevention of trespass; construction and maintenance of buildings, fences, roads, bridges, (2) "Farm" means the land, buildings, freshwater ponds, freshwater culturing and growing facilities, and machinery used in the commercial production of farm products. (3) "Farmland" means land or freshwater ponds devoted primarily to the production, for commercial purposes, of livestock, freshwater aquacultural, or other farm products. (4) "Farm product" means those plants and animals useful to humans and includes, but is not limited to, forages and sod crops, dairy and dairy products, poultry and poultry products, livestock, including breeding, grazing, and recreational equine use, RCW 84.34.020 Definitions. (2) "Farm and agricultural land" means: (i) Devoted primarily to the production of livestock or agricultural commodities for commercial purposes; RCW 16.57.010 Definitions. (9) "Livestock" includes, but is not limited to, horses, mules, cattle, sheep, swine, and goats.	Olalla	
9/16/2025 5:36 PM	108	Justin	Toulon	Kitsap County Code Section 17.455 Hello: I am contacting you about the proposed amendment that would impact horse facilities in Kitsap county. My 7 year old daughter has had riding lessons at several local riding facilities and is an active 4H member. The people and horses at these facilities have taught her many valuable lessons about responsibility, caring for another living being, kindness, and courage. The experiences at these facilities have been extremely positive and impactful. If you take away these facilities, you aren't just taking away horses, odors, dust, and horse poop, you are taking away life lessons, personal development, youth organizations, and a positive outlet for people of all ages. Also, this is another example of government overreach. More permits, more rules, more restrictions, more red tape. Give it a break. Telling people what they can and cannot do on land they own, property they pay taxes on, and a business that they already also legally operate and pay taxes on. Please do the right thing and allow the rural residential to remain RURAL. Sincerely, Justin Toulon	Olalla	Washington
9/16/2025 6:34 PM	109	Melissa	McCourt	We need to support local agricultural and stables. This community is sought as a place to reside due to its country atmosphere. Open space and farms are a part of the economy and supports wild life. Changing the laws against these local land owners and farmers in order to line the pockets of developers is a travesty to our community.	Bremerton	
9/16/2025 9:33 PM	110	Carissa	Walker	OPPOSE	Poulsbo	Washington

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9/17/2025 3:10 PM	111	Clif	Peterson	Geocentric Ideology vs. Constitutional Foundations What we are witnessing in Kitsap County, and across Washington State, is more than a zoning debate. It is a clash of worldviews. Modern urban planning is being driven by a geocentric ideology—the belief that the Earth itself is supreme, that nature has primacy, and that human freedom and enterprise must be subordinated to environmental preservation at any cost. Under this ideology, humans are often cast as parasites on the Earth—a problem to be minimized, regulated, or contained. Private landowners are not viewed as stewards with God-given rights, but as potential threats to the Earth’s supremacy. Regulations are written not to empower families or communities, but to restrict, contain, and control human activity—treating people as intruders on the land rather than its rightful caretakers. This stands in stark contrast to the intent of our nation’s founders. When the Constitution and the Washington State Constitution were drafted, the guiding principle was not the supremacy of the Earth, but the supremacy of individual rights under God. Property rights, in particular, were recognized as foundational to liberty. The Fifth and Fourteenth Amendments guarantee that no person shall be deprived of property without due process or just compensation. Article I, Section 16 of the Washington Constitution makes the same promise. Our founders understood that if government can dictate how land is used without limit, it can dictate how life itself is lived. That is why they placed the Constitution as the supreme law of the land, above state or county regulation, to protect individuals from precisely this kind of overreach. Today’s planning codes turn that hierarchy upside down. By making the Earth “supreme,” planners feel justified in stripping individuals of rights, opportunities, and traditions—whether it’s youth mentorship through horses, family farming, or home-based enterprises. But when the Earth is enthroned as supreme, God and human dignity are diminished. The truth is this: we are called to steward the Earth, not worship it. The land is entrusted to us, but it is the people—our families, our children, our communities—who hold ultimate value. Laws that reverse this order violate not only our constitutions but also the natural law of human freedom and responsibility. If Kitsap County wishes to preserve “rural character,” it should start by preserving the rights of rural people, not reducing them. To honor both creation and Creator, we must return to the constitutional foundation that protects the individual above the system, property rights above ideology, and God-given liberty above bureaucratic control.	Port Orchard	Washington
9/17/2025 3:29 PM	112	Clif	Peterson	My name is Clif Peterson, and I am the Founder and Chief Joy Officer of JOYInc. and JOY Equine. Our mission is simple yet profound: to “Inspire the world with Joy.” At JOY Equine, that mission takes form through mentorship, horsemanship, and character-building with young people. Horses are not only our passion but also a living classroom for teaching responsibility, discipline, empathy, and hope. I am writing to express serious concern regarding the proposed revisions to the Kitsap County horse facilities code. While I recognize the County’s intent to manage growth and safeguard rural character, the revisions as written would impose severe restrictions and financial burdens on facilities like ours, burdens that could unintentionally stifle the very community service we provide. JOY Equine operates on 21 acres as a place where youth are mentored and guided through hands-on equestrian experiences. We are not a profit-driven venture. In fact, our equine operations run at a financial loss each year. We accept that cost because the return is not measured in dollars, but in the lives of young people who gain confidence, resilience, and direction through their time with us. The proposed requirements, Conditional Use Permits, significant setbacks, operational restrictions, and associated fees, would dramatically increase costs on a business model already struggling to break even. For us, and for many small equine facilities across the county, this would make continuing our work nearly impossible. The outcome would not be preservation of rural character but the slow disappearance of equestrian centers that serve as vital gathering places and youth development programs. Beyond the practical challenges, these revisions raise serious constitutional concerns. Property ownership is a fundamental right protected under both the U.S. and Washington State Constitutions. Regulations that deny landowners economically viable use of their property without compensation amount to a regulatory “taking.” Imposing restrictive conditions on traditional agricultural and equestrian uses risks violating those constitutional protections, as well as Washington’s “Right to Farm” laws. I respectfully urge the County to consider the unintended consequences of these revisions. Regulations designed to protect rural life should not end up undermining it. JOY Equine, and others like us, embody rural culture, stewardship, and service. We carry forward traditions that honor the land while investing in the next generation. I invite you and your colleagues to visit JOY Equine, to see firsthand the mentorship, joy, and community impact that happens here daily. My hope is that we can work together to craft policies that both protect rural values and preserve the equine facilities that keep those values alive. Thank you for your time, your service, and your willingness to hear from those most affected. I look forward to further dialogue. With Respect and Resolve, CLIF & KERI PETERSON – EQUINE LIFE COACHES 253-514-5588 ⁴ 253-313-6866	Port Orchard	Washington
				Here’s a detailed report synthesizing the six draft Kitsap County documents, focused on how they amount to blatant violations of constitutional property rights. I’ll break it down into major themes, legal conflicts, and constitutional grounds for opposition. _____ 1. Expansion of Government Power Over Rural Lands Across all six drafts, the county asserts sweeping control over private rural property. For example: •Reclassification Report: Landowners with longstanding uses (pre-GMA industrial or agricultural operations) are being forced into restrictive categories like Rural Commercial or Rural Industrial that prohibit single-family dwellings, even though rural residential living is the bedrock of property rights. •Rural and Resource Lands Element: Explicitly designed to “contain or otherwise control rural development” and prevent landowners from using their property for anything that resembles growth or residential flexibility. •LAMIRD Restrictions: “Limited Areas of More Intensive Rural Development” narrowly define where rural property owners may exercise expanded use rights, leaving everyone outside of those arbitrary lines shackled. This transforms property ownership into conditional tenancy, where government dictates use, instead of constitutional private ownership. _____ 2. Direct Violations of the Right to Use & Enjoy Property The draft Horse Facilities Code is especially egregious: •Requires Conditional Use Permits just to board, train, or teach riding lessons on your own land. •Forces barns/stables to be 50 feet from property lines, and manure storage/paddocks 200 feet away, regardless of parcel size. This effectively renders smaller rural parcels unusable. •Imposes “hours of operation” (7 AM – 8 PM) for private equestrian activities. This is unheard of for agricultural use and equates to government telling a farmer what time he may feed his animals. By contrast, Washington’s Right to Farm law (RCW 7.48.300-.320) explicitly protects these activities from being deemed a nuisance. The county is attempting to override state law with local restrictions, which is unconstitutional under Article XI, Sec. 11 of the WA Constitution (counties cannot enact laws that conflict with general state laws). _____ 3. Takings Without Compensation Several provisions amount to a regulatory “taking” in violation of the 5th and 14th Amendments (U.S. Constitution) and Article I, Section 16 of the WA Constitution: •		

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9/17/2025 3:29 PM	113	Clif	Peterson	Agriculture Code: Redefines what counts as “primary” or “accessory” agricultural uses, stripping away traditional farm rights unless landowners comply with onerous permitting and “farm plans” reviewed by the Kitsap Conservation District. •Development Rights: The documents promote Purchase of Development Rights (PDR) and Transfer of Development Rights (TDR) schemes. These are disguised takings—landowners must sell or transfer their rights to escape restrictions. If you must pay or beg to use your land, ownership is meaningless. •Open Space & Legacy Lots: The county openly admits it wants to reduce development potential by targeting “legacy lots” created in the 1960s, while letting developers bypass limits via loopholes. Selective enforcement like this destroys equal protection. This is the textbook definition of unconstitutional regulatory taking: depriving owners of economically viable use without just compensation. _____ 4. Violation of Due Process and Equal Protection •Arbitrary Definitions: The County redefines “farm,” “garden,” “equine facility,” and “agritourism” in ways that exclude common-sense activities like gardening, boarding your own horses, or teaching riding lessons without special permits. •Special Favoritism: Developers exploiting “legacy lots” get grandfathered exemptions, while small farmers and homeowners face suffocating regulation. •Selective Burdening: Horse owners and small agriculturalists are singled out for heightened scrutiny, even though timber clearcutting (a far greater environmental impact) is permitted with minimal interference. This violates equal protection guarantees (14th Amendment, U.S. Constitution; Article I, Section 12, WA Constitution). _____ 5. Interference With Fundamental Rights The Washington Supreme Court has repeatedly upheld that property rights are fundamental. For example: •Presbytery of Seattle v. King County (114 Wn.2d 320, 1990) – regulatory takings that deny use are unconstitutional. •Guimont v. Clarke (121 Wn.2d 586, 1993) – state cannot impose burdens that strip property of viable use. •Yim v. City of Seattle (194 Wn.2d 682, 2019) – reaffirmed strict scrutiny when government infringes on fundamental property rights. By outlawing residential uses in certain zones, restricting traditional farming, and mandating expensive permitting schemes, Kitsap County is acting in open defiance of these precedents. _____ Conclusion & Constitutional Argument The combined impact of these draft codes is nothing less than: 1.A systematic erosion of private property rights—transforming ownership into revocable privilege. 2.An unconstitutional taking without compensation, violating both state and federal constitutions. 3.A direct conflict with state law (Right to Farm statutes), which local governments lack authority to override. 4.A discriminatory and unequal system that favors corporate developers while burdening small landowners and rural families. Bluntly stated: These codes treat rural citizens not as landowners, but as trespassers on their own property. That is a blatant violation of constitutional property rights and cannot withstand legal or public scrutiny.	Port Orchard	Washington
9/17/2025 3:53 PM	114	Tina	Meekins	Feedback on Proposed Kitsap County Equestrian Code Revisions Public events such as shows, clinics, or competitions are not included in a facility’s routine equestrian activities and require separate review and permitting. This requirement would effectively shut down most, if not all, equestrian events. Shows, clinics, and competitions are central to the equestrian community. Making them subject to separate and potentially burdensome permitting will discourage participation, limit opportunities for youth and adults, and could result in the end of community events that many rely on for education, competition, and connection. Barns and stables shall be located at least fifty (50) feet from any property line. Paddocks and manure storage or disposal areas shall be located at least two hundred (200) feet from any property line. This proposal is not practical for any equestrian facility or privately owned barn. Nearly every farm you see in Kitsap County has fences along the property lines and barns located centrally, not two hundred feet from every boundary. This design is backwards and unworkable for both existing properties and any future facilities. It would prevent the establishment of new barns and, over time, force the closure of existing facilities, even those that are currently grandfathered in as codes evolve. As an example, our manure storage system was designed and located by the Kitsap Conservation District, and it is only thirty feet from the road. This placement was chosen specifically for public safety and accessibility. Applicants shall demonstrate that odor, dust, noise (including amplified sound) and drainage shall not constitute a nuisance. The term “nuisance” is too subjective and open to interpretation. What is considered a nuisance by one neighbor may be completely acceptable to another. Activities such as Little League baseball games or backyard barbecues could easily meet this definition depending on who is making the complaint. The defense of being a nuisance is not a fair or reliable standard for enforcement. Hours of operation limited to 7:00 a.m. to 8:00 p.m., unless otherwise conditioned. These hours are not practical or reasonable for an equestrian facility. Care for horses often begins before 7:00 a.m. and can extend well past 8:00 p.m., especially in the summer when daylight hours are longer and activities or chores are scheduled around heat and weather. Other community activities, such as Little League games, regularly extend past these proposed hours. A requirement for visual screening of parking areas, manure storage or disposal areas, and storage area for mechanical and transportation equipment (e.g., tractors, trailers, storage pods) from adjoining properties. This requirement is excessive and impractical for most equestrian facilities. Screening parking and storage areas from every adjoining property is a burden that goes far beyond reasonable property maintenance. On our own street, there is a residence with junked vehicles, numerous ongoing projects, and several cars and trucks kept in plain view. If these screening requirements are enforced on equestrian properties, will the same standards apply to residential properties with visible vehicles and equipment? It raises concerns about fairness and consistency, especially when other types of properties are not held to these same standards. Other restrictions, mitigations and regulatory compliance measures as necessary to protect the public health, safety and welfare. Any additional restrictions should come with significant advance notice and transparent public input. This entire revision process has felt rushed, with only two weeks of notice given to the community despite the proposal being in development for two years. Future regulatory changes should be handled with much greater transparency and communication.	Port Orchard	Washington
9/18/2025 12:38 PM	115	Rhianna	Wiser	I don't believe that the proposed codes have the horse facilities and agritourism groups in mind. A hold needs to be in place while they actively talk with and work with these groups and others who will be affected should the changes come about. It was noted at the last meeting that was held that not enough people had been informed and a majority of owners were in the dark until it was shared on facebook.	Seabeck	Washington
9/18/2025 12:39 PM	116	Michele	Robinson	I would like to plea that the county reveiw their proposals using input from those affected, i.e. horse owners. The changes as written would destroy facilites, rescues and private horse owners. Certainly there must be another way. I only have private stock but new codes such as suggested would destroy me. I would hope that if there are problems with "neighbors" regarding any facilites that they could be addressed in a meaningful way. Thank you	Port Orchard	Washington
9/18/2025 6:56 PM	117	Colrain	Fragoso	The proposed changes will CRIPPLE the horseowners and stables in this county. They would also trigger bankruptcy and cause mass sellouts of properties at low prices, driving families out of the county, dropping property values, and destroying countless families ilivelihoods. You would be depriving therapeutic services for those in need, and opportunities for youth and adults, STOP this insane government overreach!!!!	Port Orchard	Washington

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Date Submitted	Id	Name First	Name Last	Comments	City	State
9/18/2025 7:13 PM	118	Kerina	Powell Mancuso	First, thank you for your work to maintain a sense of ruralness in our community. However, I am concerned with the wording found in ch 17.415 Equestrian Center Standards and Regulations. Your commitment to provide ‘direction to preserve and enhance the rural character’ of our community is not supported by the language in the new code. The rules provided in the revised ch. 17.415 are excessive and impractical to meet. What is the purpose of these changes? To reduce equestrian centers, which to me is reducing ruralness of our community. This I believe is opposite of your goal. I recommend you determine what the goal is and write the code to support that goal. Is the goal to ensure manure does not enter waterways, write the document to support the goal. Determine methods to use the manure to support the community. Is the goal about dust exposure, then allow easier methods of outside dust reduction such as roof construction over arenas. In addition, what detection method or exposure limit will be required to validate the regulation? These changes risk the decrease to equestrian activities and the decrease of land that supports those activities. The code supports the smaller community of neighbors, rather than the community that provides and utilizes these activities. Do the authors of the code comprehend the positive impact these facilities have to the tens of thousands of families that utilize these centers. In addition, when writing code you must provide an alternate method of ability to comply. I do not see any words supporting mitigation possibilities. It seems as if the changes are the view to protect one person’s concerns. That is not how community stewards should make decisions or changes. Come and visit an equestrian facility and see the positive impact these facilities have on our children and community they support.	Bremerton	Washington
9/19/2025 5:41 AM	119	Joanne	Corey	There has been a lot of misconceptions on previous land owners having Agriculture use permits, having a boarding facility in attempts to gain grandfathering statues. I have a written document state no use nor commercial warehousing distribution retail sales of feed/forage ever occurred on the property historical land use was a private single family rural residence. There has also been comparisons to a cottage industry of Monogramming to Horse Boarding. If so then horse boarding facilities should have Permits, Cups, fire inspections, hours of operation, parking , road impact and road requirements	Silverdale	Washington
9/19/2025 12:41 PM	120	Gregory	Salo	Please seat the Kitsap Ag Advisory Council. Allow all Kitsap voices to be heard.	Silverdale	Washington
9/19/2025 5:40 PM	121	Ted	Lindstrom	We are strongly opposed to the proposed changes to the Kitsap County zoning code, specifically, Chapter 17.415 Allowed Use Standards for Equestrian facilities. The below section of the proposed code, will have significant negative impact on small businesses: 17.455.075 Equestrian facilities. B. Barns and stables shall be located at least fifty (50) feet from any property line. Paddocks and manure storage or disposal areas shall be located at least two hundred (200) feet from any property line. I judge over 90% of 5 acre parcels in the county would not be able to comply with these setback requirements. This will force small businesses to depart the county and deter new businesses from locating here resulting in lost revenue for the county. As an example, we operate a small breeding farm on 3+ acres using 2 brood mares. During an IRS audit, the examiner suggested we do horse boarding to supplement our business income. If these changes were implemented we could not meet the setbacks and would not be allowed to board horses. A government “Catch 22”, to make IRS happy and add boarding to the business we’d have to relocate outside Kitsap County. Right now, the economy makes that a non-starter. If this really is the Year of the Rural, stop building high density housing ie apartments, and support small business that need rural locations.	Port Orchard	Washington

Date Submitted	ID	Name First	Name Last	Comments	City	State
9/19/2025 8:58 PM	122	tanya	book	We retired here and bought a small rundown equestrian facility to keep my husband and me active in our older years. We have improved our property from a rundown, falling fence, abandoned barn, bank repossessed property to a vibrant horse boarding facility that brings many people happiness and a safe, clean environment for the horses. Flamingo Farms is an asset to Kitsap County since my boarders moved to the area for the equestrian lifestyle and I am able to provide a pleasant environment to fulfill their plans. These boarders have bought houses, work, and shop in Kitsap County. This is a win-win for both the equestrian community and the County.	Poulsbo	Washington
9/20/2025 1:11 PM	123	David	Tougas	Regarding the new Horse Facilities Draft Code, I oppose any change to the existing codes regarding equine boarding, training or other facilities. For many years, Kitsap County has been a popular haven for equine enthusiasts. The proposed Code seems like bureaucratic over-reach to control and/or eliminate activities that have long been a positive feature of living in, and visiting, Kitsap County. The effect of the proposed Code will be to restrict future equine activities in Kitsap County to the super-rich. Many horse farms would end up going out of business due to the cost and hassle of having to comply with the proposed Code any time they embarked on an idea or an efficiency that was considered novel. The conditional use permit, set-back requirements, and limitations on allowed activities, are among the most problematic features of the proposed Code. The current Code, and civil law, provide for the health, safety and welfare of "the public," and I don't see a need to change the status quo. Most Kitsap County residents like the current diverse mix of urban and rural land uses, including the many horse farms around the County, and the new Horse Facilities Draft Code seems focused on making one particular land use much more highly-regulated and expensive.	Poulsbo	Washington
9/20/2025 1:23 PM	124	Robyn	Thompson	You should not be rezoning we need the equestrian facilities for our children and adults alike	Port orchard	Washington
9/20/2025 1:28 PM	125	Megan	Elliot	Please abandon all zoning changes concerning equestrian facilities. This will put immense undue burden on stables and the equestrian community as a whole.	Port Orchard	Washington
9/20/2025 1:37 PM	126	Shay	Kneupper	all equestrian zoning restrictions should be abandoned. these new proposed zoning laws are ridiculous	Keyport	Washington
9/20/2025 1:41 PM	127	Lisa	Palmer	Leave the horse facilities alone! There are much bigger problems in Kitsap County to concern yourselves with, like crime and homeless humans living in filth. Resident like having these facilities with options for use, and most of us enjoy the animals and rural aspects of our community. Please don't ruin it for us!	Bremerton	Washington
9/20/2025 2:30 PM	128	Ashley	Callaway	It is inconceivable to me that the county would want to impose restrictive zoning regulations on the county's active equestrian community. Horses are part of the rural charm of Kitsap county, it would be a true loss to our community if the properties equestrians rely on to house their animals were regulated out of existence.	Bainbridge Island	Washington
9/20/2025 2:34 PM	129	Emily		Please abandon all zoning changes related to equestrian facilities. You know this is wrong, please don't do this to our community. Please don't do this to my neighbors. Please don't hurt the Port Orchard I love.		
9/20/2025 2:39 PM	130	Anna	Jones	This new code for equestrian facilities and anyone with horses on their property is ridiculous. It doesn't protect horses from being abused, and it doesn't improve safety for anyone. It's simply a way for people to complain and make trouble for their neighbors. I don't even have horses and i think this is ridiculous. If this passes, let the existing conditions be grandfathered in and only new stables and land intended for horses to apply. Since this set of new laws does not benefit anyone, animals included, but lends itself to another expense, i am against it. I understand how it protects surrounding land owners from some minor troubles, but i'm wondering how those people didn't take that into consideration upon buying the adjacent property? It's not as if new barns are popping up everywhere. Next time, include the equine community in writing new code. They're the experts anyway. My mom has a horse on her property and will have to move her manure pile and her barn if this passes, even though it offends none of the neighbors. Look- this is a pretty terribly worded argument, i get it. I'm in the middle of making lasagna. But this new code is dumb enough for someone like me who has no skin in the game to at least voice my opinion. Try something actually useful next time.	Kingston	Washington
9/20/2025 2:58 PM	131			In regards to changes to chapter 17.415 Allowed Use Standards and 17.415.17 Equestrian facility: The rezoning code update for equestrian facilities seems nonsensical and like it will only make life much harder for the local equestrian community. As a resident of Kitsap county I have never taken issue with the original equestrian zoning codes and see no need to change them. The only benefit seems to be punishing the equestrian community. Why do this if it would be hostile to a group of Kitsap county residents, with no real benefit to anyone not involved in equestrian activities?		
9/20/2025 3:20 PM	132	Arlene	Spencer	Leave all equestrian facility zoning codes alone. 'No!' to zoning discouraging horse facilities.	Bainbridge Island	Washington
9/20/2025 3:23 PM	133	Katheryn	Goldean	Changes to the Equestrian Center Standards and Regulations are unnecessary and unacceptable. They are an overstep and do nothing to improve the wellbeing of livestock or people. As someone who lives in a single family home in a suburban development adjacent to equestrian properties, we have no desire to change or limit our neighbors' facilities. If anything, we welcome their presence in our community. Our family eventually plans on purchasing land with the intent of having horses, and restrictions like this are enough to make us consider looking outside of Kitsap county.	Poulsbo	Washington
9/20/2025 3:30 PM	134	D'Jeane	Peters	The proposed restrictions on equestrian facilities would have a negative impact on the rural character of our country, limit economic opportunities for small parcel owners. Updating our zoning requirements should, at minimum, consult those affected most,	Poulsbo	Washington
9/20/2025 3:56 PM	135	Phoenix	di Corvo	Regarding 17.415.17* - This is a massive burden on small farms and small equestrian businesses. I see no benefit for the community at large in forcing this ordinance. This is a waste of resources and time and should be abandoned as a proposed change.	Bremerton	Washington
9/20/2025 4:18 PM	136	Micaela	Petty	The county should abandon all zoning changes related to equestrian facilities. This is a rural county that appreciates its equestrian facilities.	Kingston	Washington
9/20/2025 4:20 PM	137	Dennis	Parker	The changes that are in the bills forthcoming about horses on properties are ridiculous. The language used leaves way to many loopholes for greedy politicians and county officials to charge people for the simple pleasures of owning a horse. To keep manure on your own land youd have to own well over 5 acres which in my experience is the typical land size in the area. These changes are overreach at best and ridiculous. This area is richbwith natural beauty and horse riders deserve to be left alone like anyone else.	Port orchard	Washington
9/20/2025 5:37 PM	138	Sara	Moriarty	I enjoy seeing horses around and I would be deeply disappointed to see Kitsap passing any sort of law that restricts the keeping and use of them. We are moving farther and farther away from our roots in the west and it would be a terrible mistake to forget them.	Poulsbo	Washington
9/20/2025 5:38 PM	139	Mary	Kay	I am appalled at the county initiative to destabilize the horse boarding an rescue environmeent. It is very expehive to board a horse in my area, Central Kitsap, at present let alone with the county crucifying pet owners with permit fees so high that small boarders will need to close. What is the point of this terrile initiative? Have the developers decided they must have all the land, and horses should have none?This initiative is just aful and will result in much loss of euine life as owners are driven to put down their family pets. Please rethink this permit initiative.	Poulsbo	Washington
9/20/2025 5:51 PM	140	Andeara	Purdy-Hohn	I moved to the Kitsap area last year when my husband got stationed out here. To cope with his being gone more often, I found my way into the horse world. Over a year later and I am preparing to purchase my first horse as well as taking regular lessons. These lessons along with the time I get to spend in the horse community has improved my quality of life so much. I am a healthcare worker who sees a lot of traumatizing things on a day to day basis. Horses have given me an outlet to help deal with everything I see. These code changes to equestrian facilities should be rejected. The damage it will cause to this community is too much. There is so much history and value to horses that needs to continue and be passed on to the new generations. Please consider the lives this change will impact.	SILVERDALE	Washington
9/20/2025 6:29 PM	141	Rosanna	Diggs	Please abandon all zoning changes related to equestrian facilities. These proposed changes were clearly not well thought out- what on earth is wrong with a paddock being near a property line? Enforcing new rules like this will close so many stables. You'll end jobs, livelihoods, and lifestyles. We have two kids who have greatly benefited from access to horses and regular lessons at a small local stable.	Port Orchard	Washington

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9/20/2025 6:48 PM	142	Nicholas	Snyder	Do not make any changes to county code regarding equestrian facilities. Kitsap is a rural county with rural sensibilities, dont allow well connected rich folks to force us to change the way weve always lived.	Bainbridge Island	Washington
9/20/2025 6:57 PM	143	Nathan	Diggs	To the Honorable Members of the Kitsap County Board, I am writing as a concerned resident of our county to express my opposition to the proposed increases in permits and additional restrictions on local equestrian centers. Equestrian centers play a vital role in Kitsap County, which has a long and proud history of agricultural roots. They not only provide valuable recreational and educational opportunities for people of all ages, but also serve as a cornerstone for local agriculture, tourism, and small business. Many families, youth programs, and equine therapy initiatives rely on these centers for their livelihoods and well-being. Raising permit costs on equestrian centers would put an unnecessary financial burden on these already hard-working businesses, especially as they continue to recover from the economic challenges of recent years. These additional costs could force some centers to close their doors, resulting in the loss of jobs and important community programs. This proposal seems extremely shortsighted and reads like a personal attack. The vagueness in the wording leaves too much up for interpretation and the distances seem like they were arbitrarily added out of spite. The ramifications will no doubt affect the foot traffic of the Kitsap County Fair. I have no doubt many local residents will opt out of attending when knowledge of these changes spread. There is no positive way to spin closing many centers, and it will be many. I believe if this was to be ratified it would make us a pariah with tourism and agricultural community in surrounding areas during the largest tourism event of the year. That of course will affect the vendors who depend on the attendance. Furthermore, implementing more restrictions could limit access to equestrian activities and stifle the positive impact these facilities have on our region's culture and economy. Equestrian centers are often stewards of open space, helping to preserve the rural character of our county and maintain green areas for both people and wildlife. I respectfully urge you to reconsider any proposals that would increase permits or impose further restrictions on equestrian centers. Instead, I encourage you to support policies that will help these essential community institutions thrive and continue to contribute to our county's unique identity and prosperity. Thank you for your attention to this important matter.	Port Orchard	Washington
9/20/2025 7:56 PM	144	Melissa	Balok	This proposal would be an unnecessary burden on small farms and small equestrian businesses. I see no benefit in these changes for the community at large. This is a waste of resources and time. The proposal should be abandoned.	Bremerton	Washington
9/20/2025 8:05 PM	145	Linda		Please drop the idea. People want to enjoy their horses. There is no reason people and horses cannot get along and live in the same space. They're way more important things going on in Kitsap County that deserve our attention.	Bremerton	Washington
9/20/2025 8:26 PM	146	Kim	Aiello	Please cancel and abandon all updates to the rural equestrian facilities.. We need to keep what makes Kitsap unique with their farms and and equestrian facilities.	Bremerton	Washington
9/20/2025 8:36 PM	147	Lea	Trujillo	Please don't apply zoning restrictions to equestrian facilities. It represents a hardship for current owners to meet the new restrictions and might even force some to owners to close or scale down their facility. Apply zoning restrictions to new equestrian facilities if you must, but allow the existing facilities to remain as is.	Bremerton	Washington
9/20/2025 8:54 PM	148	Deandria	Simons	The updates in the draft presented are particularly biased against horses. The ability to own or ride horses is one of the reasons people live in and move to Kitsap County, but with housing becoming more dense these people are reliant on boarding facilities. In addition, the language protects a landowner who keeps their own horses at home, but creates significant burdens for that landowner if they rent or lease their single family horse property to a tenant who wants to keep their horses, and only their horses, on the property they live on even if it's leased. Also, the requirements for fencing and manure piles should not be applied only to equestrian facilities; if pasturing animals too close to a well or allowing manure to pile up too close to a neighbor poses a health risk it would seem that the same requirement to install fencing and keep manure away from property lines should apply to all agricultural facilities, not just equine. The restrictions on competitions are not clear - do they cover only equestrian competitions, or would they also apply to competitions for dogs or people? There is also no specification as to number of entrants or spectators. Finally, if noise and dust are a concern, the same requirements to mitigate them should apply to other animals as well; cattle and chickens are much noisier and dustier than horses - if these changes are meant to protect the community, they need to apply to all causes of the related issues. Singling out a single animal when so many create the same issues simply comes across as an attack on the county residents who own, ride, and love horses.	Burley	Washington
9/20/2025 9:16 PM	149	Carrie	Silvernale	I'm not going to recite all of the RCW's that protect our rights to farm, have equestrian centers and agriculture. The new code being recommended are extreme and this is brought on due to one complaint on one facility? Wanting to impose 50 foot setbacks in 200 foot setbacks, not allow a facility to run an event past a certain time. The county has allowed many new apartment complexes and far too many new homes. We live on Glenwood Rd., Southwest. Where at the far end there's been over 300 new homes across the street at the other end a huge apartment complex. This is caused so much traffic, pollution, excessive lighting, and excessive noise. Why is this OK? Equestrian facilities have dust isn't that better than pollution from vehicles if there's a need for the codes, it needs to be reconsidered and not as restrictive as what is being presented. It seems to me the county is acting greedily, pushing out the rural Farms in in order to allow more homes and apartments to be built, thus increasing the overall revenue by more taxpayers on the same amount of property. One homeowner paying taxes on 20 acres is nothing compared to 300 houses paying property taxes on 20 acres. We all need to live and work together. The answer is not pushing the rule community out and turning our community into another Renton or Bellevue.	Port Orchard	
9/20/2025 9:20 PM	150	Dona	Shaw	Hands off horses, trails, property used by	Bremerton	Washington
9/20/2025 9:53 PM	151	Judy	Willott	Urge remove sections with restrictions on horse stable facilities	BAINBRIDGE ISLAND	Washington
9/20/2025 10:08 PM	152	soren	diehl	lose the equestrian regulation pronto. it's a bad look for y'all	Bainbridge island	Washington
9/20/2025 11:02 PM	153	Scott	Dauner	I don't own horses, but I do not support restrictive zoning changes related to equestrian facilities in Kitsap.	Silverdale	Washington
9/21/2025 6:41 AM	154	Sarah	Herr	Abandon zoning changes in regards to equestrian facilities	Silverdale	Washington
9/21/2025 8:11 AM	155	Kimberly	Wolfe	Washington state is already one of the most expensive states in the country to live. While part your Year of The Rural proposal aims at affordable housing through manufactured home parks, if the uneducated equestrian coding goes through, people like myself, a single person with 3 jobs, would no longer be able to afford board in Kitsap county. That would be if any facilities could even afford to stay open. This would force me to choose between my best friend, Warrior, and my mother. I also fear for so many of my friends' businesses that revolve around having a thriving equine community. Let's not add to the unemployment rate.	Bremerton	Washington

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				In 2008, a group of local citizens came together to oppose a “legacy lot” development on Woods Road in South Kitsap. None of us knew what a legacy lot was. It was horrifying to learn how these work. We tried every angle to try to stop it, and we failed. The biggest disappointment was that our County Commissioners could have voted to put an end to the travesty inherent in these high, urban-level developments scattered across our county largely in the rural areas. They failed to do that. The Woods View development would see 78 homes on 12 acres. In 1971, a similar kind of grass roots effort saved the Seattle Pike Place Public Market. The voters in that case were allowed to decide whether to keep Seattle’s heritage alive or let it succumb to development. What these two have in common is character and legacy. Anyone familiar with the legacy lot issue will know that developing homes was not the original intent. It’s a gross interpretation by developers and our complicit commissioners to allow that to be. Legacy Lots and the coding considerations for our horse farms go hand in hand. They speak about vision for Kitsap County. Where developers and compliant county leaders see fast money, the rural nature of our county is a long-term vision. It’s one that safeguards this county’s rural areas for future generations, for tourism, and for businesses. No one could have foreseen the character that the Pike Place Market added for Seattle. It’s now a historic landmark that the tourism industry boasts. This could be a vision that rural Kitsap shares, where boasting about our farms, especially the horse farms, is something we embrace in the future when fewer and fewer of these are found so near to Seattle. My farm is one such place. It’s a former homestead built at the turn of the 20th century. Our barn is registered with the state as a historic building. Our house, which started as a two-room log cabin, still has some of the original logs. I raised my children here and have acted as a steward of the land and the buildings. My daughter wants to use the farm to earn an income, including boarding horses. Under the new code, she would be unable to do that. It’s essentially killing her dream, which included pumpkin patches and more. I implore our elected officials in charge of our county to have the courage to close the legacy lot loophole, to drop all code changes concerning horse farms, and to embrace a vision for rural Kitsap that allows it to flourish. This would be your legacy for future generations. The ad campaign currently underway does not mask what’s behind it. The devil is in the proverbial details. Do the right thing for our citizens and protect rather than destroy our rural areas.		
9/21/2025 8:22 AM	156	Pamela	Bilodeau		Port Orchard	Washington
9/21/2025 8:33 AM	157	Eve	Lussier	Abandon targeted equestrian zoning restrictions	Port Orchard	Washington

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9/21/2025 8:34 AM	158	Samuel	Buskirk	I am concerned with the Horse Facilities Draft Code, particularly the lack of a grandfather clause and the setback requirements for stables and manure storage. If the owner can demonstrate proper control of odors and hazards there shouldn't need to be a distance requirement. We have many equestrian enthusiasts within our community and it sounds like this will be quite disruptive to their activities. Seems to go against the idea this is "The Year of the Rural." Under the guise of public health it seems more like an attempt to clear up problems for housing developers.	Bremerton	Washington
9/21/2025 8:52 AM	159	Grace	Breeden	This is an outrageous attempt to stomp down on those who are living peacefully with their livestock and trying to maintain businesses (such as riding schools). I do not agree with the zoning changes and limitations, please do better.	Poulsbo	Washington
9/21/2025 9:07 AM	160	Katherine	Stang	Horse property is great to have locally and they're great neighbors, there's no reason to add restrictions - especially ones that are out of their control without removing the horses.	Bremerton	Washington
9/21/2025 9:14 AM	161	Shaughn	Stang	The new restrictions and rules being proposed for equestrian properties are ridiculous and would be expensive to the citizens of Kitsap county who have operated their properties for years. The county should maybe look to other more pressing problems rather than creating more hardship on its citizens in a already stressful time.	Bremerton	Washington
9/21/2025 9:15 AM	162	Alexa	Mercurio	Please abandon rezoning.		
9/21/2025 9:20 AM	163	Danielle	Maitra	Please reconsider imposing new strict codes that negatively affect the equestrian centers and stables in Kitsap County	Port Orchard	Washington
9/21/2025 9:33 AM	164	Brittney	Bergeron	I urge the county to abandon all zoning changes regarding equestrian facilities. My children are the sixth generation growing up in this area and we have always all been horse people. The idea that people are going to start putting these ridiculous restrictions on horse owners is counterproductive to the agricultural wealth that are County stands for. Agritourism and quiet living in the countryside are huge draws for this area. Putting such severe limitations on equestrian facilities would hurt our children our families and the fabric of our community. Please stop.	Poulsbo	Washington
9/21/2025 10:05 AM	165	Victoria	Gingrey	This is a land grab for developers disguised as something meant to benefit the community. Not only will it hurt the equestrian and farming community, but the fabric of our community at large. This proposal would be an unnecessary burden on small farms and small equestrian businesses. I see no benefit in these changes for the community at large. This is a waste of resources and time. The proposal should be abandoned.	Port Orchard	Washington
9/21/2025 10:06 AM	166	Cheryl	Holliday	The county needs to abandon all zoning changes related to equestrian facilities. As an avid horseman of many years, I can tell you these changes are unrealistic and dystopian especially when applied to a preexisting facility. It would seem that people are choosing to move "into the country," and then become unhappy with the current residents; farms and farm animals, training facilities that represent the rural economy. Regardless, the suggested changes are unnecessarily restrictive and unrealistic when applied to any large animal facility, especially where horses are concerned.	Bainbridge Island	Washington
9/21/2025 10:09 AM	167	Linda	Fischer	"Increased Costs while Limiting Business These proposed changes will make it more difficult for horse owners and equestrian businesses to operate, leading to increased costs requiring significant investment in infrastructure. The proposed changes also limit the types of activities allowed on equestrian properties. Kitsap County's Community Identify: What we would ask of the county is an understanding of the contribution of the equestrian community and how central it is to the identity of Kitsap County known for its horse culture. The proposed changes will threaten this identity. It should not be overlooked that the equestrian community has a vital economic impact on Kitsap County. Equestrian business contributes monthly to the local economy in increased tourism." Sadly, I believe Kitsap County will continue to look for "new" revenue via NEW TAXES because of the downturn in the expected sales tax revenue in 2026 and beyond. BUT THIS IS NOT THE PLACE TO START YOUR RECOVERY	Port Orchard	Washington
9/21/2025 10:31 AM	168	Charles	DeCosta	Way too many regulations on use of property as the homeowner desires without any compensation to the homeowner. The costs of land purchases is way to high and out of control. Too many permit requirements and costs of permits. too many water requirements. Please focus on cutting regulations not increasing the regulations. Too many child care regulations. Let the parents determine if the facility is acceptable.	Seabeck	Washington
9/21/2025 10:35 AM	169	Lita	Hiraldo	As an equine enthusiast who currently lives in town and owns no equines I see this bill as a dangerous threat to all equine lovers. The requirements that a stable be a minimum of 50 feet from a property line, with a manure pile a minimum of 200 feet could cause undue burden on equine owners. Every property layout is different. Especially to those who own miniature horses-- who have vastly different space requirements -- this legislation is incredibly restrictive without reason. I believe this update should address only the use of manure piles next to water sources or run off. The rest seems to be a gross overstep of personal land ownership rights and will have a negative impact on all horse owners, including rescues.	Silverdale	
9/21/2025 12:37 PM	170	Rhoda	Gage	Please abandon all changes to regulations regarding equestrian facilities	Bremerton	Washington
9/21/2025 12:39 PM	171	Aimee	C	This proposal would be an unnecessary burden on small farms and small equestrian businesses. I see no benefit in these changes for the community at large. This is a waste of resources and time. The proposal should be abandoned. If a resident in a rural area does not care for dust, they should move to a paved city.	Bremerton	Washington
9/21/2025 12:45 PM	172	Debora	Saylor	No equestrian zoning changes!!!	Silverdale	Washington
				I'm writing to express my deep concerns with the proposed changes to the county codes regarding equestrian facilities. At the informational meeting on 9/11, we were told that one of the goals of "Year of the Rural" is to foster rural businesses while protecting the rural character of the county. These proposed changes will do exactly the opposite—the proposed changes are so extreme and unreasonable that they will stifle any further growth of the Equestrian community in Kitsap County. The Equestrian community is a thriving part of Kitsap County, and contributes significantly to the local economy. These proposed changes were not well thought-out, the Equestrian Community was not involved in any of the discussions, no studies were done. They will have far-reaching ramifications that will hurt the Equestrian Community, and should be stricken. I am a horse owner in Kitsap County and, like many in this county, I don't own my own farm. I rely on boarding facilities to keep my horses healthy and safe. We have wonderful Equestrian Facilities in this county, but the community needs to continue to grow into the future, to continue to thrive. The currently available facilities will not be sufficient to accommodate the continually increasing interest, so we need to be able to support both those rural businesses in the future, as well as future horse owners in the county. Boarding facilities and individual horse owners are not the only ones who would be hurt by these proposed code changes; I sit on the board of The Whole Horse Place, a nonprofit in Port Orchard. Our mission statement is the following: "The Whole Horse Place rescues senior horses with no other options and partners them with people of all ages; especially youth and veterans; for hands-on education, emotional growth, and lifelong lessons. We focus on care, not riding, creating a safe space where horses and humans support one another in healing, learning, and connection."		

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Date Submitted	Id	Name First	Name Last	Comments	City	State
9/21/2025 1:46 PM	173	Ewann	Berntson	I also have a daughter who is on the autism spectrum, who benefitted greatly from the opportunities to work with the horses at the Whole Horse Place over the years. I have therefore witnessed first-hand the amazing connections that can form between horses and people of all ages. Facilities such as this one should be made more widely available to youth and veterans, not stifled by baseless code policy. I want to point out a couple of the proposed changes specifically, namely the 200' setback for paddocks and manure bins (as well as the proposed requirement for visual screening of trailers and tractors), and limits on hours of operation. Bottom line, there is no scientific or environmental evidence to support this arbitrary designation of 200', and it will effectively eliminate many future potential Equestrian Facilities. The onus should be on those proposing the changes to bring the evidence that such changes are necessary, not on the community to defend current practices that are not generating complaints. Similarly, the proposed requirement for visual screening of tractors and trailers—rural communities have tractors and trailers! And the county's own stated goal of protecting the rural nature of the county should take that fact into account. Tractors and trailers are not eyesores, they are the necessary tools for maintaining rural spaces and resident' livelihoods. These are not HOAs, and these areas should not be treated as such. I understand these changes would not affect current Equestrian Facilities, but that effectively restricts the county to a snapshot of the Equestrian businesses that we have currently, and will equally effectively prohibit any future growth. The second aspect I wanted to bring up is the limitation on Hours of Operation (proposed to be 0700-2000). As a horse owner myself, I know from years of experience that caring for horses can be a 24-hour/day effort when emergencies arise. To be told we cannot have access to our horses during certain hours of the day is idiotic. Medical emergencies don't happen during business hours only. Horse owners also have lives outside of the barn, and sometimes we need to ride in the evenings or early mornings. These activities do not create disturbances, and do not affect neighbors. Again, Business Hours are irrelevant to horses and their needs. It's imperative to understand the Equestrian Community and how it functions, and it is fully apparent that those who have devised these proposed code changes are grossly uninformed. We were told at the 9/11 meeting that these proposed changes were motivated by complaints regarding one individual facility, and that it stems from having a road that is too narrow to provide safe access to emergency vehicles. The clear solution is to resolve this individual case by widening the road, NOT to completely alter the county codes. It would have been simple to reach out to the Equestrian Community in Kitsap—we are not hard to find! The fact that there was no input to these proposed changes from members of the Equestrian Community leads us to believe that none of these changes are intended to actually help the community. Also, the lack of lead-time for discussion was unacceptable; we were told this information was announced in January, going out on the County website and in newsletters, which was clearly insufficient. Again, it would have been simple to reach the community directly. Expecting that community members routinely check the County website for proposed code changes is unreasonable. The timeline for the official vote should be lengthened, to allow the affected communities sufficient time to counter the grave injustices that are being proposed.	Port Orchard	Washington
9/21/2025 1:47 PM	174	Ewann	Berntson	Bottom line, there is no scientific or environmental evidence to support this arbitrary designation of 200', and it will effectively eliminate many future potential Equestrian Facilities. The onus should be on those proposing the changes to bring the evidence that such changes are necessary, not on the community to defend current practices that are not generating complaints. Similarly, the proposed requirement for visual screening of tractors and trailers—rural communities have tractors and trailers! And the county's own stated goal of protecting the rural nature of the county should take that fact into account. Tractors and trailers are not eyesores, they are the necessary tools for maintaining rural spaces and resident' livelihoods. These are not HOAs, and these areas should not be treated as such. I understand these changes would not affect current Equestrian Facilities, but that effectively restricts the county to a snapshot of the Equestrian businesses that we have currently, and will equally effectively prohibit any future growth. The second aspect I wanted to bring up is the limitation on Hours of Operation (proposed to be 0700-2000). As a horse owner myself, I know from years of experience that caring for horses can be a 24-hour/day effort when emergencies arise. To be told we cannot have access to our horses during certain hours of the day is idiotic. Medical emergencies don't happen during business hours only. Horse owners also have lives outside of the barn, and sometimes we need to ride in the evenings or early mornings. These activities do not create disturbances, and do not affect neighbors. Again, Business Hours are irrelevant to horses and their needs. It's imperative to understand the Equestrian Community and how it functions, and it is fully apparent that those who have devised these proposed code changes are grossly uninformed. We were told at the 9/11 meeting that these proposed changes were motivated by complaints regarding one individual facility, and that it stems from having a road that is too narrow to provide safe access to emergency vehicles. The clear solution is to resolve this individual case by widening the road, NOT to completely alter the county codes. It would have been simple to reach out to the Equestrian Community in Kitsap—we are not hard to find! The fact that there was no input to these proposed changes from members of the Equestrian Community leads us to believe that none of these changes are intended to actually help the community. Also, the lack of lead-time for discussion was unacceptable; we were told this information was announced in January, going out on the County website and in newsletters, which was clearly insufficient. Again, it would have been simple to reach the community directly. Expecting that community members routinely check the County website for proposed code changes is unreasonable. The timeline for the official vote should be lengthened, to allow the affected communities sufficient time to counter the grave injustices that are being proposed.	Port Orchard	Washington
9/21/2025 2:02 PM	175	Rebecca	Nowlin	Abandon all zoning changes related to equestrian facilities	Port Orchard	Washington
9/21/2025 2:27 PM	176	Brittany	Sulc	To whomever it may concern, as a resident of Kitsap county, I'm horrified by the proposed changes. My 11 year old daughter is passionate about horseback riding. It is among the most expensive sports, but it is also one of the most special. Learning to care for a horse and developing riding skills is beneficial to kids of all ability levels, sometimes even serving therapeutic purposes. If small, family-owned stables are no longer sustainable, no child in the county will be able to learn to ride unless their parents are in the highest tax bracket and can manage to travel 2+ hours multiple times a week to other counties. The welfare of the animals owned by small stables is also in question. Many people who offer lessons do so to fund care of vulnerable animals who were abandoned, neglected, or abused. Without being able to teach, many of the horses in their care will end up losing their lives. I'm not sure if whoever proposed this considered these factors. I pray that's the case. The alternative is that profit is simply more important to them than animal welfare, local culture, and accessible learning opportunities for the kids in our area. I urge you to reconsider.	Bainbridge Island	Washington
9/21/2025 4:05 PM	177	Amber	Longworth	To whomever it may concern, as a resident of Kitsap county, I'm horrified by the proposed changes. My 10 year old daughter is passionate about horseback riding. It is among the most expensive sports, but it is also one of the most special. Learning to care for a horse and developing riding skills is beneficial to kids of all ability levels, sometimes even serving therapeutic purposes. If small, family-owned stables are no longer sustainable, no child in the county will be able to learn to ride unless their parents are in the highest tax bracket and can manage to travel 2+ hours multiple times a week to other counties. The welfare of the animals owned by small stables is also in question. Many people who offer lessons do so to fund care of vulnerable animals who were abandoned, neglected, or abused. Without being able to teach, many of the horses in their care will end up losing their lives. I'm not sure if whoever proposed this considered these factors. I pray that's the case. The alternative is that profit is simply more important to them than animal welfare, local culture, and accessible learning opportunities for the kids in our area. I urge you to reconsider.	Poulsbo	Washington
9/21/2025 4:23 PM	178	Brent	Sloman	Do not change any zoning in regards to equestrian and farm animals. We want less government laws not more	Poulsbo	
9/21/2025 4:50 PM	179	Sara	Estrada	Please abandon all zoning changes related to equestrian facilities	Port Orchard	

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Date Submitted	Id	Name First	Name Last	Comments	City	State
9/21/2025 5:03 PM	180	Tami	Berry	I don't have the proper words to tell you how incredibly disappointed I am that the county is proposing this code restriction. I am an avid horse lover, but beyond that, my daughter and her best friend run a small equine business. Lessons, love, compassion, care, and kindness are just a few of the things students learn through the amazing bond of a horse and partner. I myself have bonded with these horses and they are my family. I see first-hand what horses can do for every age and every ability. They are truly care-takers and healers. The thought of the county taking that away is beyond disbelief. Do not implement these codes. From a mother, daughter, wife, meemaw and friend to all those that also love their animals and equine facilities.	Poulsbo	Washington
9/21/2025 5:14 PM	181	Kris	Angermeier	Please do not change any zoning for equestrian communities in Kitsap. The ones that already here belong here. Horses are beauty and healing animals. If people are complaining, they should not have bought property next to any of them. Leave the zones alone. Leave the animals alone. So tired of this type of stuff. Please let them be.	Bremerton	Washington

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Date Submitted	Id	Name First	Name Last	Comments	City	State
9/21/2025 5:48 PM	182	Joanne	Corey	I think with all the controversy with Horse Boarding the attention has been reverted away from the Agriculture zoning codes. 1. 17.360c.030 without direct access... the missing piece to this is not just easement holders, but the rights of ingress/egress use of the ability to object or approve. 2. Right to farm notifications, again notified by the green page in my property taxes with no way of objecting if I live in a well established rural single family residence. Also, State and Federal Laws can be made more strict with local laws, but Local laws cannot be so strict. Right to Farm Act states they must be established prior to surrounding non agriculture and non forestry. Let's not have the same issues perpetuated and continue to cause more unsettling in Agriculture Uses. We've got to work together to maintain longevity and sustainability along with good practices heading forward for all.		
9/21/2025 6:10 PM	183	Darcy	Howell	Hello, I'm writing regarding equestrian facilities code updates. I don't have a business, but I am a horse owner in Kitsap County and at times I use commercial equestrian facilities. I feel you are unfairly targeting them. You say the code will only apply to new equine businesses, but even so, the new codes would be stifling. I think the code changes should be completely dropped from your Year of the Rural package, that is if you truly want to keep Kitsap rural. I have a darker suspicion that you just want to open up more properties for development, and I have to say the new trend is very disturbing. I have lived in Kitsap County since 1976 and it has gone from being very rural to city like and crime has become rampant. We need rural areas to keep what is left of the beauty of our county. Owning horses in Kitsap should always be easy and encouraged. The permits for equestrian businesses should be inexpensive and easy to get. Hours of operation need to be generous as most horse owners have full time jobs and need access to boarding facilities and arenas before and after work. The restrictions you place on where paddocks and barns can be built according to how far they are from property lines is rigid and doesn't take into account the geographical layout of the land. Regarding smells, I've never been on a horse property that smells as bad as all the sewer vents that line urban streets. I really think the smell is a non-issue. People have been in close contact with horse manure for thousands of years with little to no negative impact on our health. As a whole horse properties are a way of holding on to our heritage. Remember, just over a hundred years ago horses were our main source of transportation. They have helped us explore, settle and fight for our land. Now it is time we fight for them. I implore you to drop the proposed code changes entirely.	Burley	Washington
9/21/2025 7:09 PM	184	Amber	Longworth	To whomever it may concern, as a resident of Kitsap county, I'm horrified by the proposed changes. My 10 year old daughter is passionate about horseback riding. It is among the most expensive sports, but it is also one of the most special. Learning to care for a horse and developing riding skills is beneficial to kids of all ability levels, sometimes even serving therapeutic purposes. If small, family-owned stables are no longer sustainable, no child in the county will be able to learn to ride unless their parents are in the highest tax bracket and can manage to travel 2+ hours multiple times a week to other counties. The welfare of the animals owned by small stables is also in question. Many people who offer lessons do so to fund care of vulnerable animals who were abandoned, neglected, or abused. Without being able to teach, many of the horses in their care will end up losing their lives. I'm not sure if whoever proposed this considered these factors. I pray that's the case. The alternative is that profit is simply more important to them than animal welfare, local culture, and accessible learning opportunities for the kids in our area. I urge you to reconsider.	POULSBO	Washington
9/21/2025 7:14 PM	185	Betti	Gieser	I'm writing to you, Kitsap County to plead the new code restrictions DO NOT be put in place. I grew up riding horses on my friends property in Maple Valley Washington and it really is a wonderful childhood experience that taught me confidence and trust of animals. My friend and great niece own a small equestrian business to help people, especially children learn how to ride and take responsibility for the caring of horses and other animals. You must understand that these small business owners are not doing it solely for the money but for the love and commitment they have for their community. This is not an easy business and every dollar is needed for the business to even survive. I beg of you do not implement these codes, as it will shut down many of these small businesses. Let them teach!	Ocean Shores	Washington
9/21/2025 8:20 PM	186	Kimberley	Anderson		Poulsbo	Washington
9/21/2025 9:13 PM	187	Kaya	Berry	don't have the proper words to tell you how incredibly disappointed I am that the county is proposing this code restriction. I am an avid horse lover, and a lesson instructor, horse trainer alongside my best friend. We run a small equine business. Lessons, love, compassion, care, and kindness are just a few of the things our students learn through the amazing bond of a horse and partner. I myself have bonded with these horses and they are my family. I see first-hand what horses can do for every age and every ability. They are truly caretakers and healers. The thought of the county taking that away is beyond disbelief. Do not implement these codes.	Poulsbo	Washington
9/21/2025 9:26 PM	188	Saleem	Shafi	I am disturbed by the proposed code changes for horse facilities. The proposed rules are entirely unnecessary and would devastate the kind of rural industries that make Kitsap such a wonderful place to live. Kitsap is a rural county and it should embrace and encourage a rural lifestyle. The rule changes feel like a solution looking for a problem and is just bad government.	Kingston	Washington
9/21/2025 9:41 PM	189	Madeleine	Linsday	As someone who worked with horses in her youth, reading about the proposed zoning changes within Kitsap county was disheartening. Working with horses has changed my life as well as the clients of the stables I volunteered at. With these proposed changes not only will you be hurting local horse owners but it will be a major hit to boarding facilities. Given all the changes the people of Kitsap County have already gone through these past several years, this would be another major hit and hurdle. I believe all zoning changes related to equestrian facilities should be abandoned. Please, the people have Kitsap have gone through enough. Zoning changes would force us to make decisions and choices that no one should ever have to make.	Port Orchard	Washington
9/21/2025 10:38 PM	190	Margaret	Mahoney	Please do not reclassify equestrian site as commercial this is crazy we live here because we get to enjoy rural area and small towns. Do not end the ability which you will do by creating larger barriers for this great and beneficial sport/recreation that is pivotal to our community. We don't need to be like Seattle. Keep our areas the way they are.	Port Orchard	Washington
9/21/2025 11:00 PM	191	Dawn	Oien	The amendments to the Kitsap Co zoning and codes you are proposing will make it very difficult for myself and many others to operate our farms and facilities. We are not just private entities here, we are stewards for the development of our youth, families, and the community. We are a safe place to learn responsibility, engage with animals, and connect with a large equestrian and agricultural heritage that would otherwise be lost. Imposing restrictions will undoubtedly eliminate our viability and slam the door on the programs we have built. The economic impact of these new zoning and codes will be a slow death on agriculture and equestrian activity in this county. Will these zoning and code changes make properties less valuable when people go to sell because they won't be able to sell as a facility or equestrian property? The setback requirement for paddocks will eliminate most facilities that are five acres and under. Facilities on ten acres would be reduced to about an acre of usable paddock space and that's if there are no critical areas. Also, per the 2016 Ag code there was no animal density, and this is on board to be eliminated. This especially will kill the horse boarding and anyone who has more than two or three horses. As far as complaints go, we all have that one neighbor that will complain but per your code you are giving the neighbor the power to shut someone down as soon as they don't like something. We are not just hobby farmers and backyard equestrians, for many this is our livelihood and every time we turn around, we must defend it. What you propose affects a lot of people right down the line. Sustaining the rural character in Kitsap County is vital and we hope you can see the balance we create in the community and the importance of preserving our agricultural and equestrian communities.	Port Orchard	Washington
9/21/2025 11:28 PM	192	Claudia Ower		Keep Kitsap Green. Once developed our wildlands are gone forever and our wildlife are homeless. We must fight for them, for their survival.	Kingston	Washington

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Date Submitted	Id	Name First	Name Last	Comments	City	State
9/21/2025 11:34 PM	193	Abigail	Welch	I am writing to respectfully oppose portions of the draft Kitsap County Zoning Code for Equestrian Facilities, dated September 2, 2025. While I appreciate the County's effort to ensure responsible land use and good stewardship of our rural resources, the proposed 200-foot buffer requirement for paddocks and manure storage areas will have serious unintended consequences for horse owners, small farms, and the broader equestrian community. Under the draft code, any paddock or manure area must be located at least 200 feet from a property line. As shown in the attached diagrams, this restriction leaves little to no usable space on parcels under 10 acres. On 5 and 7-acre parcels, nearly all land becomes unusable for horses once the buffer is applied. This essentially eliminates the ability of families and new landowners on smaller parcels to develop small commercial facilities to keep horses at all, despite the code's stated purpose of allowing smaller parcels to participate in animal-based agriculture. This blanket restriction also conflicts with the intent of RCW 36.70A.011, which recognizes that rural lands are to be preserved for their rural character and that rural-based economies, agriculture, forestry, and traditional lifestyles must be supported. By making equestrian activities practically impossible on smaller rural parcels, the County would be undermining the very rural uses and traditions the Growth Management Act seeks to protect. In addition, the draft code's language on facility expansion (17.455.075.H) will discourage current equestrian facilities from seeking even modest growth or improvements. Because expansions trigger a new site plan review—and could force compliance with the new 200-foot buffer—existing stables and training centers may find themselves unable to upgrade, add stalls, or improve pastures without losing functional land. This creates an unsettling effect that will stagnate our local equestrian infrastructure, forcing facilities to either remain static or shut down over time. The result is a significant barrier to entry for horse ownership. Only buyers of 10-acre or larger parcels will have enough usable space to meet minimum requirements for horse wellness, exercise, and turnout when operating a boarding and or training facility. This reduces opportunities for families, 4-H youth, and recreational riders to have access to these commercial facilities that provide boarding, training, and instruction in our community. Furthermore, Beyond the direct impact to horse owners, the economic consequences for our local rural economy will be substantial. Kitsap County supports a wide network of businesses that depend on a thriving equestrian community, including: •Local farmers supplying hay and bedding. •Farriers and veterinarians serving horse owners. •Feed, tack, and supply stores. •Retailers of trucks, trailers, tractors, and related equipment. Restricting equestrian activity to only the largest parcels will diminish this economic ecosystem, resulting in a loss of income and opportunity across multiple local industries. I urge the County to consider more balanced alternatives. A reduced buffer of 50–75 feet, consistent with existing barn setbacks, would still provide environmental and neighbor protections while allowing small and mid-sized parcels to continue serving equestrian purposes. Additionally, requiring property-specific farm plans and Best Management Practices—already a feature of the code—would better achieve the County's goals than a blanket 200-foot rule. Kitsap County has a proud equestrian heritage, and many families move here specifically to live a rural lifestyle that includes horses. I respectfully ask that you revise the draft code to ensure equestrian access remains viable on smaller parcels, protecting both our community traditions and the local rural economy in a manner consistent with RCW 36.70A.011. Thank you for your consideration.	Port Orchard	Washington
9/22/2025 12:38 AM	194			I checked all due to the sheer stupidity that someone would pitch this this town and country have enough government crap as it is we don't need more they'll hike our taxes and just give our money to more that will misuse it		
9/22/2025 2:24 AM	195	Marissa	Bernhofer	Abandon all zoning laws related to equine activities!	Port Orchard	Washington
9/22/2025 6:56 AM	196	Alyssa	Richards	I urge the county to rethink this change. I own a small hobby farm with horses and because of the shape of my property, something like this would make it extremely difficult to legally keep horses. I have the appropriate space for my animals, but because of the long rectangle shape it is makes the position of the barn, paddocks and manure compost hard to place. My property was actually issued a grant before I owned it and the previous owners had amazing and thoughtful drainage installed to control run off and water management. Perhaps resources like that could help current farms as a compromise to let farms do business and protect the environment from run off? Also, farm hours are difficult. We unfortunately don't get the luxury of staying within a daytime business hours as farmers.	Port Orchard	Washington
9/22/2025 7:20 AM	197	Hope	McPherson	With property abutting the APP-ID 66 Stokes/Campbell application, I strongly object to this zoning change. Burley Creek has created a fragile wildlife corridor that over the past 10 years on my game cams have included bear (with and w/o cubs), deer, lynx(l), river otters, racoons, opossums, coyotes (regulars), and more. This RP area is doing exactly what is should be doing in an area that's already lost vast amounts of forested land in Port Orchard to development. Please, please, please again deny this zoning change that harms the wildlife in the important Burley Watershed.	Port Orchard	Washington
9/22/2025 8:23 AM	198	Marcia	Brixey	Please abandon all zoning changes related to equestrian facilities	Silverdale	Washington
9/22/2025 8:31 AM	199	Jennifer	Horton	Do not impose more restrictions on the equestrian community		
9/22/2025 9:21 AM	200	Taylor	Reynolds	Please reconsider reclassifying horse facilities as commercial. These are vital properties for sport and therapy. I was lucky enough to be a part of a horse facility growing up and while many of my friends turned to less savory forms of entertainment I was content with my horses and the community in that barn. Thank you for your consideration.	Bremerton	Washington
9/22/2025 10:01 AM	201	jazmine	jeweline	abandon all zoning changes related to equestrian facilities	Bremerton	Washington
9/22/2025 11:16 AM	202	Esmi	Perez	I urge the county to abandon all zoning changes regarding equestrian facilities. As someone who moved to Kitsap County five years ago, I've come to deeply appreciate the agricultural heritage and values that define this area. The proposed restrictions on horse owners are counterproductive to preserving this essential character. What drew me to this community was the opportunity for quiet countryside living and the wonderful way that riders, hikers, and bikers can all share our trails harmoniously. This inclusive approach to outdoor recreation is one of Kitsap's greatest assets. Agritourism and rural living are major draws for our area. Putting severe limitations on equestrian facilities would damage the fabric of our community and undermine the very qualities that make Kitsap County special. I've witnessed firsthand how equestrian activities contribute to the local economy and preserve our agricultural traditions. Please reconsider these zoning changes and protect the equestrian community that is so vital to our county's identity.	Bremerton	Washington
9/22/2025 11:20 AM	203	Christina	Renz	This proposal will cause unnecessary financial, emotional, and physical harm to the land, families, and businesses that own/rent small farms and small equestrian businesses. Horses are by nature quiet and low odor animals, and do not serve a role as an aggressive guardian to a farm. They are arguably the least offensive livestock option because of this. This is a waste of the county's resources and time, and gives the appearance of a personal vendetta rather than in the betterment of the communities. The proposal should be abandoned.	Port Orchard	Washington
9/22/2025 11:26 AM	204	Gail	Engebretson	Part of the charm of Kitsap Co. is the rural feeling it has. In these times we need to encourage and support farms, a disappearing endeavor. I feel that your restrictions are solely for the benefit of new housing sites that are encroaching on the rural farmland around us. These new codes and restrictions will have an impact that I think you will regret as the rural charm of our area is destroyed. I do not own or operate any of these rural farms and don't have a personal stake other than that I live here and appreciate the rural aspects of our county and want very much to see that supported. Don't push out the little guy to make room for the big guy - too much of that happening all around us.	POULSBO	Washington
9/22/2025 12:04 PM	205	Shelly	Regan	I support equestrian farms and do not support the upcoming changes to policies	Bremerton	Washington

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Date Submitted	Id	Name First	Name Last	Comments	City	State
9/22/2025 12:29 PM	206	Janet	Schiersch	I heard Ms. Cleveland say, at the 9/10/25 KCAC meeting, that wildlife corridors had been previously mentioned. My family moved to Kitsap County in 1983 and were appreciative of the rural beauty, the forests and the chance to share these with natural wildlife. Over the years, the changes in the county - increase in population, construction, and traffic - have made "rural" living much more complicated. I would urge investigation into the possibilities of wildlife corridors in whatever definition best fits our county. Other areas have successfully learned to cohabitate with their wildlife neighbors. It would be detrimental to all if the natural environment be decimated. Wildlife corridors cut down on expensive wildlife/vehicle collisions. Corridors in other states reduce these by up to 97 percent. Corridors also connect fragmented habitats, allowing wildlife to access food, shelter and others of their own species. Thirty thousand species become extinct each year. Much of this decline is caused by habitat destruction. I believe that the majority of residents in Kitsap County agree that wildlife populations can and should be protected by forward thinking and intelligent planning.	Kingston	Washington
				In the proposed change they are moving any reference to equestrian facilities to its own chapter. In addition, changing code to stabling, riding and pasture is solely use by the property owners own horses. The proposed changes have added numerous restriction that are new to equine facilities and horse owners. They have deleted equine boarding or training under the definition of "Agriculture use, primary". GMA (1) "Open space land" means (g) Any land that is used primarily for equestrian related activities for which a charge is made, including, but not limited to, stabling, training, riding, clinics, schooling, shows, or grazing for feed and that otherwise meet the requirements of (a), (b), or (c) of this subsection; Under the new chapter 17.455.075 Equestrian facilities they have added two Conditional use permits at \$8,500 per permit, a site plan which are additional costs. Also, added is competitions, feed, tack or accessories retail or hosting public earns will require more permits and reviews. Setback of 200 feet from any property line which means 400' total around the entire property then the new facility has to operate within the new area. That area has to fit, barns, paddocks, indoor and or outdoor arenas hay storage, equipment storage, parking to think of just a few needs. The entire perimeter would potentially have to be fenced as to comply with the requirement for visual screening of equine activities in rural Kitsap. A potential new owner would have to find and purchase land to fit all of the new requirements as well as 10 of thousands of dollars in fees to the county. They are requiring odor, dust, noise controlled so as not to be a nuisance or health problem to adjoining property or uses. Horses by nature create dust when they move. Any equine riding in an arena will create dust, horses in a paddock will create dust, the practicality of watering an arena often enough is not realistic or good use of viable drinking water. Limiting the number of horses, one horse per one-half acre, the new property owner can only make so much income off of one boarder, so again this forces the purchase of extreme size of land. Hours of operation is another hard restriction 7:00 am to 8:00 pm. Equine facilities require a lot of labor and they generally start work at 6:00 a.m. If you board your horse and it has an injury during the night and it needs a veterinarian to come and then it needs to be trailered to the hospital that business is not allowed during those hours. If a boarder plans to travel to an away event such as Rebecca in Montana, the departure time is around 4:00 a.m. to make the trip in one day and not add stress to horse and owner. They state it is only for new facilities but they put a caveat of "Other restrictions, mitigations, and regulatory compliance measures as necessary to protect public health, safety, and welfare". That pretty much lets them decide whatever else they want to add when they want to and just title it "welfare". They place many hardships for a new potential owner; to comply with all of the new code and then calculate the financial costs, they would be upside down and realize it is not a viable business. All of these are code revisions and additional requirements go up against Washington Growth Management. RCW 36.70A.011 Findings—Rural lands. The legislature finds that this chapter is intended to recognize the importance of rural lands and rural character to Washington's economy, its people, and its environment, while respecting regional differences. Rural lands and rural-based economies enhance the economic desirability of the state, help to preserve traditional economic activities, and contribute to the state's overall quality of life. The legislature finds that to retain and enhance the job base in rural areas, rural counties must have flexibility to create opportunities for business development. Further, the legislature finds that rural counties must have the flexibility to retain existing businesses and allow them to expand. The legislature recognizes that not all business developments in rural counties require an urban level of services; and that many businesses in rural areas fit within the definition of rural character identified by the local planning unit. Finally, the legislature finds that in defining its rural element under RCW 36.70A.070(5), a county should foster land use patterns and develop a local vision of rural character that will: Help preserve rural-based economies and traditional rural lifestyles; encourage the economic prosperity of rural residents; foster opportunities for small-scale, rural-based employment and self-employment; permit the operation of rural-based agricultural, commercial, recreational, and tourist businesses that are consistent with existing and planned land use patterns; be compatible with the use of the land by wildlife and for fish and wildlife habitat; foster the private stewardship of the land and preservation of open space; and enhance the rural sense of community and quality of life. RCW 7.48.310 Agricultural activities and forest practices—Definitions. For the purposes of RCW 7.48.305 only: (1) "Agricultural activity" means a condition or activity which occurs on a farm in connection with the commercial production of farm products and includes, but is not limited to, marketed produce at roadside stands or farm markets; noise; odors; dust; fumes; operation of machinery and irrigation pumps; movement, including, but not limited to, use of current county road ditches, streams, rivers, canals, and drains, and use of water for agricultural activities; ground and aerial application of seed, fertilizers, conditioners, and plant protection products; keeping of bees for production of agricultural or apicultural products; employment and use of labor; roadway movement of equipment and livestock; protection from damage by wildlife; prevention of trespass; construction and maintenance of buildings, fences, roads, bridges, ponds, drains, waterways, and similar features and maintenance of stream banks and watercourses; and conversion from one agricultural activity to another, including a change in the type of plant-related farm product being produced. The term includes use of new practices and equipment consistent with technological development within the agricultural industry. (2) "Farm" means the land, buildings, freshwater ponds, freshwater culturing and growing facilities, and machinery used in the commercial production of farm products. (3) "Farmland" means land or freshwater ponds devoted primarily to the production, for commercial purposes, of livestock, freshwater aquacultural, or other farm products. (4) "Farm product" means those plants and animals useful to humans and includes, but is not limited to, forages and sod crops, dairy and dairy products, poultry and poultry products, livestock, including breeding, grazing, and recreational equine use, fruits, vegetables, flowers, seeds, grasses, trees, freshwater fish and fish products, apiaries and apiary products, equine and other similar products, or any other product which incorporates the use of food, feed, fiber, or fur.		

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				RCW 84.34.020 Definitions. The definitions in this section apply throughout this chapter unless the context clearly requires otherwise. (1)"Open space land" means (a) any land area so designated by an official comprehensive land use plan adopted by any city or county and zoned accordingly; or (b) any land area, the preservation of which in its present use would (i) conserve and enhance natural or scenic resources, or (ii) protect streams or water supply, or (iii) promote conservation of soils, wetlands, beaches or tidal marshes, or (iv) enhance the value to the public of abutting or neighboring parks, forests, wildlife preserves, nature reservations or sanctuaries or other open space, or (v) enhance recreation opportunities, or (vi) preserve historic sites, or (vii) preserve visual quality along highway, road, and street corridors or scenic vistas, or (viii) retain in its natural state tracts of land not less than one acre situated in an urban area and open to public use on such conditions as may be reasonably required by the legislative body granting the open space classification; or (c) any land meeting the definition of farm and agricultural conservation land under subsection (8) of this section. As a condition of granting open space classification, the legislative body may not require public access on land classified under (b)(iii) of this subsection for the purpose of promoting conservation of wetlands. AGAIN: (g) Any land that is used primarily for equestrian related activities for which a charge is made, including, but not limited to, stabling, training, riding, clinics, schooling, shows, or grazing for feed and that otherwise meet the requirements of (a), (b), or (c) of this subsection; (2) "Farm and agricultural land" means: (i) Devoted primarily to the production of livestock or agricultural commodities for commercial purposes; RCW 7.48.305 Agricultural activities and forest practices—Presumed reasonable and not a nuisance—Exception—Damages. (1) Notwithstanding any other provision of this chapter, agricultural activities conducted on farmland and forest practices, if consistent with good agricultural and forest practices and established prior to surrounding nonagricultural and nonforestry activities, are presumed to be reasonable and shall not be found to constitute a nuisance unless the activity or practice has a substantial adverse effect on public health and safety. (2) Agricultural activities and forest practices undertaken in conformity with all applicable laws and rules are presumed to be good agricultural and forest practices not adversely affecting the public health and safety for purposes of this section and RCW 7.48.300. An agricultural activity that is in conformity with such laws and rules shall not be restricted as to the hours of the day or day or days of the week during which it may be conducted. [2009 c 200 s 2; 2007 c 331 s 2. Prior: 1992 c 151 s 1; 1992 c 52 s 3; 1979 c 122 s 2.] NOTES: Findings—Intent—2007 c 331: "The legislature finds that agricultural activities are often subjected to nuisance lawsuits. The legislature also finds that such lawsuits hasten premature conversion of agricultural lands to other uses. The legislature further finds that agricultural activities must be able to adopt new technologies and diversify into new crops and products if the agricultural industry is to survive and agricultural lands are to be conserved. Therefore, the legislature intends to enhance the protection of agricultural activities from nuisance lawsuits, and to further the clear legislative directive of the state growth management act to maintain and enhance the agricultural industry and conserve productive agricultural lands." [2007 c 331 s 1.] But the importance of equestrian facilities is not just emotional—it is economic. The 2022 American Horse Council study found that the equine industry contributes over \$72 billion annually to the U.S. economy. More than 90% of horse enthusiasts are female, meaning this industry directly supports women in sports, recreation, and business. Horses are not a niche hobby—they are a powerhouse economic driver. Sonoma State University once studied the agricultural impact of Sonoma County, and they found that the equine industry ranked second only to wine grapes in its economic contribution. That is extraordinary. And it shows that the impact of horses goes far beyond the barn. The horse industry sustains: Hay farmers, who diversify their crops and incomes by producing feed. Truck and trailer dealerships. Barn and fence builders. Feed and tack stores. Veterinarians and farriers. Local show facilities, venues, and suppliers. Unlike a bicycle, whether or not a horse is ridden on any given day, it still requires ongoing care, feed, vet and farrier services, and equipment—all purchased locally. That means constant and reliable revenue streams for small businesses and steady tax income for the county. Now let's talk about fairness. Little League baseball, soccer, and other youth sports are rightly celebrated for the role they play in children's lives. But they also rely on taxpayer-funded facilities—fields, parking, maintenance, utilities. In contrast, equestrian "little leagues" take place at privately-owned stables, maintained at private expense. They cost the taxpayer nothing. To penalize stables for the parking or noise that comes with children's sports is hypocritical. Would you consider banning Little League games because parents park on the street or kids make noise during practice? Of course not. Then why is the same activity, when it's girls riding horses, treated differently? This disparity raises uncomfortable questions. Is gender bias and indifference alive and well in Kitsap County government? Why is an activity where the vast majority of participants are female, under attack? I urge you not to adopt a code change that would endanger or restrict these facilities. To do so would not only limit opportunities for children and families, but also diminish resources that strengthen our entire community. Don't make equestrian communities extinct in Kitsap County, because that is exactly what these changes will do. Please stand with the families, small businesses, and young people who rely on these spaces, and preserve the future of our local equestrian community.		
9/22/2025 12:47 PM	207	Thomas	Wittwer		Olalla	
				I am submitting these comments on behalf of the Kitsap Environmental Coalition working group focused on the Year of the Rural. Our focus is on the protection and health of our natural environment and all forms of life including but not limited to humans. The group is still gathering input from members and listening to the views of other organizations. Here are the suggestions we have ready at this time. We expect to comment further as the YOTR work proceeds. Before getting to specifics of the chapter, we want to emphasize that we support the guiding focus of the 2024 Comp Plan—concentrate housing density in UGA and protect rural areas from sprawl. We also want to express appreciation for the action by the BOCC in June 2025 to not proceed with the Rural Wooded and Rural Protected rezoning requests that asked for greater housing density (rezoning to Rural Residential). General Comments on the Chapter 1. We support continued retention of this chapter as a separate chapter in the Comp Plan. Our rural and resources lands are vitally important to the health of all of life in Kitsap. The separate chapter helps to emphasize that. 2. Give more attention to mapping, understanding and protecting wildlife corridors. 3. Give more attention to containing/controlling rural development. 4. Give more attention to protection of critical area ecosystems. Rural development (p.17-18) 1. We generally agree with policies in this section. For 5th policy in this category (about Buildable Lands Program): 2. We strongly agree with first strategy to prepare a Rural Lands Analysis. Especially emphasize the location of wildlife corridors and habitat connectivity.		

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9/22/2025 12:55 PM	208	Beverly	Parsons	3.The second strategy (about monitoring) needs more than monitoring. It needs enforcement of the policies and needs information on how the data will be used to take any necessary corrective action. Resource Lands and Working Lands (p. 18-20) 1.Second goal (about forest lands), 4th Policy bullet (on p.19): We are concerned about the language of “use of industry-standard Best Management Practices” within forest resource lands and rural wooded. We want to see clearcutting of forests stopped in Kitsap. This will not happen by supporting “industry-standard Best Management Practices”? Instead, change this to best available science and technology. 2.Second goal (about forest lands), 5th Policy bullet (on p.19): Add a strategy to this policy to this effect: “Encourage longer rotations in timber production, disallow clearcutting and encourage new forestry practices.” 3.Second goal (about forest lands), 6th Policy bullet (on p.19): Change the Forestry Advisory Council to include community members. We need an advisory council that can help to transparently negotiate industry interests with those of various community interests. 4.Fourth goal (about agricultural lands lands), 2nd Policy bullet (on p.19-20): While we strongly agree about having an Agriculture Advisory Council, that council also need to include community members to help to transparently negotiate ag interests with those of various community interests. 5.Fourth goal (about agricultural lands lands), 2nd Policy bullet (on p.19-20): In addition to an Agriculture Advisory Council, consider having an Equestrian Advisory Council that includes both horse owners and community members. Rural Business (p. 20-21) 1.Question: We Appreciate attention to rural business. How this will be monitored for its value and what needs to be done to support such businesses? How will innovation in rural businesses be encouraged by the county? Please be more specific. 2.Ensure that the Critical Areas Ordinance (CAO) is strictly followed when businesses are set up. Also ensure monitoring and consequences for violation of the CAO. Rural Services and Infrastructure (p. 21-22) 1.Regarding Goal 2 (LAMIRD), hold fast to the LAMIRD boundaries and requirements. Do not allow sprawl beyond these boundaries and ensure adherence to policies. 2. Give priority to Goal 3 in this category (rural walkability and bikeability). Add strategies to the policy under this goal to support more concrete action. Connections within rural areas are very important. 3.Give greater attention to creeks and other water bodies when building is permitted. Rural Environment (p.22) 1.This is a very important set of goals and needs to be given priority attention. State that environmental protection in rural areas has priority over other policy categories. Change to 2024 Climate Change Element (p. 24) Edit your suggested change to read: Policy 7.3 Encourage owners of private forests and designated Forest Resource Lands to keep these properties forested or in continuing timber production using best available science that includes climate change science. Strategy 7a. We agree with your change for the 2024 Climate Change chapter except, please drop “in production”. While we encourage a focus on keeping forestlands forested the county needs to encourage that it be untouched or appropriately thinned/harvested in sustainable ways without clearcutting.	Hansville	Washington
9/22/2025 1:01 PM	209	Sarah	Bay	Please abandon all zoning changes pertaining to equestrian areas.	Bremerton	Washington
9/22/2025 1:03 PM	210	Cynthia	Landis	Please ABANDON all codes related to equestrian farms/ facilities	Bremerton	Washington
9/22/2025 1:09 PM	211	Beverly	Parsons	I am submitting these comments on behalf of the Kitsap Environmental Coalition working group focused on the Year of the Rural. Our focus is on the protection and health of our natural environment and all forms of life including but not limited to humans. The group is still gathering input from members and listening to the views of other organizations. Here are the suggestions we have ready at this time. We expect to comment further as the YOTR work proceeds. 1.In our submission on the draft Rural and Resource Lands Chapter we called for a change to the Forestry Advisory Council and the Agriculture Advisory Council to include community members. This needs to be addressed in or before the code updates. 2.It is our understanding that the agriculture community has been actively developing and recommending policy and code changes. Are their recommendations included here? If not, these code updates are premature. Why not wait to update the codes until the Ag Advisory Council is established? This speaks to the importance of forming and supporting advisory councils as soon as possible and before codes are updated.	Hansville	Washington

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9/22/2025 1:23 PM	212	Anya	Tewari	Abandon all zoning changes related to equestrian facilities.	Bremerton	Washington
9/22/2025 1:26 PM	213	Jim	Perich-Anderson	I oppose changes to zoning related to equestrian facilities. These facilities currently provide needed employment that is low impact on the environment and reinforce the rural character of the county. They are of service in providing us with recreational and therapeutic service.	Kingston	
9/22/2025 1:38 PM	214	Elizabeth	Goodge	I respectfully urge Kitsap County to abandon all proposed zoning changes related to equestrian facilities. Horses and equestrian activities are an important part of Kitsap's rural character, economy, and community life. The draft code would add restrictions that create unnecessary barriers for property owners and equestrian facilities. These changes could discourage participation in horse-related activities, limit rural economic opportunities, and erode a way of life that has long been valued in our county. Rather than imposing new zoning changes, I encourage the County to support policies that preserve and strengthen rural and agricultural uses, including equestrian facilities, as part of a balanced approach to growth and development. I also encourage the County to work directly with equestrian facilities, property owners, and rural residents to find collaborative solutions that support both community needs and responsible land use. Thank you for your consideration.	Port Orchard	Washington
9/22/2025 1:39 PM	215	Diana	Everett	Please abandon all zoning proposals for equine facilities! Stop the nonsense and leave the rural Kitsap county as is.	Bremerton	Washington
9/22/2025 2:10 PM	216	Holly	Smelser	Please STOP rezoning and destruction of out land and leave people who own horses alone! You want city life, go to Seattle!!	Bremerton	Washington
9/22/2025 2:24 PM	217	Melody	Grange	an ACUP/ or CUP for horse and boarding; get your butts out of here. Seriously, harharhar. Kitsap. You guys. Find something else to wield your "power" and "micromange" over, like maybe stop letting people cut all our trees and build a million disgusting 3000 sf track houses of junk with no character or care. We want horses, we want farms, we want our land protected, we want our trees and fish, and we want our government to do its darn job - and do it kindly and correctly. Messing around with horse facilities, why don't you get a real heritage tree program going and do something useful with your time. THANKS		
9/22/2025 4:17 PM	218	Dianna	Orrrels	Please drop all proposed zoning changes that burden equestrian facilities and instead strengthen existing protections under Washington State's Right to Farm Act.	Poulsbo	Washington
9/22/2025 4:58 PM	219	Lucy	Wildblood	Re: Chapter 17.415 Allowed Use Standards 17.415.17* Equestrian facility. Must comply with Chapter 17.455, Agriculture Code. Chapter 17.455 Agriculture Code: These zoning restrictions are RIDICULOUS. This is a rural community. Absolutely not. 100% disagree with this on all counts.	Bainbridge island	Washington
9/22/2025 5:16 PM	220	Christine	Weckerly	Abandon all zoning changes related to equestrian facilities.	Seabeck	Washington
9/22/2025 5:25 PM	221	Geraldine	Wilson-Khalsa	My husband and I moved to Kitsap County in order to have a riding horse in retirement. I grew up riding and training horses. I personally experienced their value in my development during my growing years. My career as a school counselor was dedicated to facilitating student growth. Our children are living in a very stressful world. The daily news is filled with stories that create anxiety and insecurity. After all, that is how we sell news copy, touching on human emotions. Unfortunately, since Columbine, we also include school shootings in our news. It is a real threat and public schools include active shooter drills in addition to fire drills. Since the year 2000, Washington State has had 574 school shootings with 462 deaths. Obviously, there are other items in our news, both good and bad, but school shootings are among the most devastating. Students respond to these reports with fear and anxiety. It is critical that we adults provide opportunities for our children to be feel grounded, connected, and secure. We have organized sports, clubs, music lessons, etc. in all communities. However, it is our rural communities that provide equine experiences and the therapeutic benefits that stables and horses create. City kids might have a neighborhood sports field, but that is not the same. Kitsap County has 4H, riding lessons, therapeutic programs, private farms, boarding, visits to local farms, learning to care for animals, developing responsibility, muscle development, how to ride individually or as a team, etc.. This list goes on and on. It is not only Kitsap county that is served but surrounding cities such as Tacoma and Seattle. We have a treasured resource in our county farms and barns. In addition to our youth, I am advocating for seniors, such as myself. The barn where I board my horse provides community, exercise, and mental stimulation. All things encouraged for senior citizens to have a healthy life. Your new zoning codes are excessive, making it difficult to maintain our equine culture. In fact, your new codes seem to be designed to eliminate the future of the equine lifestyle Kitsap is noted for. It is not sufficient to say these new codes are not retroactive. We need to protect the future of our farms and facilities. Doing so keeps our county sound and emotionally healthy. The rural atmosphere elicits calm as opposed to the rush of our cities and freeways. Urban areas are known for their increased crime and violence. Simply brushing or stroking a horse releases oxytocin, serotonin, and endorphins. Stables and farms are healthy. As our County Commissioners, your responsibility is not only fiscal but for the well being of our citizens as a whole. This includes the use of rural environment for their livelihood, family heritage, enjoyment, community sense of belonging, and overall emotional health. Do not destroy the future of our rural community with new codes. The old zoning codes are effective.	Port Orchard	Washington
9/22/2025 5:41 PM	222	Carole	Centeno	Say no to the code proposal for equine properties	Seabeck	Washington
9/22/2025 6:30 PM	223	Nancy	Tarbell	Kitsap has a strong heritage of support for equine activities. Our youth learn responsibility and gain in lifelong skills and friendships. Keeping horses is already expensive and hard, daily work. No need to regulate further this responsible hard working community.	Port Orchard	Washington
				I am writing today both as a retired resource planner who worked for the Kitsap Conservation District for 18 years and as a private landowner who keeps horses and a miniature donkey on my property. During my career as a resource planner, I visited hundreds of farms all across Kitsap County. My work included writing farm plans, facilitating a variety of cost share projects to the tune of about one million dollars, helping people develop their properties for bringing in livestock while protecting natural resources, and much more. Nearly all of the farms I visited kept livestock, and most of that livestock included horses. Properties ranged from one-acre lots with a couple horses to large boarding and training facilities. With this background of experience, I find many of the proposed code changes highly concerning. I will discuss a few of them here. To start, I want to point out that the "Rural Character" definition states several intentions, including "Support traditional rural lifestyles and rural-based economies, including farming, horseback riding [emphasis the author], and...". Please consider how the following proposed code changes would impact not only the local horse community but also local watersheds and environmental health. Section 17.455.075 Equestrian facilities, Part B: "Barns and stables shall be located at least fifty (50) feet from any property line. Paddocks and manure storage or disposal areas shall be located at least two hundred (200) feet from any property line."		

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9/22/2025 6:42 PM	224	Helen	Jones	At nearly all equestrian facilities, paddocks are attached directly to barns so that horses can freely move from stalls to paddocks and back again without having to be led somewhere else for turnout. Therefore, logically, the paddock setback should be no further than the suggested barn setback, i.e. 50 feet. Regarding manure storage area setbacks, having to site them 200 feet from all property lines would prevent all facility owners with less than 5 acres, nearly all facility owners with 5 acres, and even most owners with 5 to 10 acres (depending on the property's geometry) from being able to store manure in a given area, and manure would have to be left scattered about the property. Manure management issues would remain problematic instead of being addressed and improved. This could cause continued leaching and runoff of bacteria and nutrients into Kitsap's waterways, ultimately reducing water quality and degrading habitat for freshwater and marine species including salmon & orcas. I have seen first-hand the positive changes that happen when a waste storage facility, whether it's one bin or multiple bins, is installed on a horse property. Manure is protected under one roof, it's easier to turn it and facilitate the composting process, and when it's well-aged it's a safe and valuable soil amendment that horse owners can use for themselves as well as make available to other people. But most outside sources will not fund projects that are not within local code requirements, and the cost of construction waste storage facilities is prohibitive for many landowners. So under the 200' setback, manure management issues would be far less treatable than they are now. Section 17.455.075 Equestrian facilities, Part F, number 1: "A limit on the number of horses kept at the facility based on acreage and site conditions (e.g., one horse per one-half acre)" Currently there are many well-managed facilities throughout Kitsap County with higher stocking rates than one horse per half-acre. Consider these examples: A private training facility that welcomes members of Washington High School Equestrian Team (WAHSET) for lessons and comradery as they train their horses for a variety of events and compete state-wide and even nation-wide. An equine rescue where animals are rescued, rehabilitated and retrained (if able) to become safe and gentle schooling horses to teach horsemanship, sportsmanship, responsibility, confidence and more to successive generations of riders. Uncountable boarding stables that host clinics and lessons for people of all ages who do not have the wherewithal to keep their horses at home. A non-profit that rescues senior horses and partners them with people, especially youth and veterans, for hands-on education, emotional growth, and lifelong lessons. These facilities could not survive if only allowed one horse per half-acre. Think of the great losses this would entail for our county. These are but a few examples of the egregious effects the proposed equestrian facility code changes would have not only on the people who own, manage, utilize and benefit from equestrian facilities, but also to the multitude of businesses that support the local horse community. There will always be problematic situations in any kind of business, but effectively halting the future development and/or improvement of all equestrian facilities is not the answer.	Port Orchard	Washington
9/22/2025 6:44 PM	225			The aggrieved party's comments on this pending code change show that this is a personal issue, not a county code issue. They are simply looking to make their neighbor's miserable.		
9/22/2025 6:46 PM	226	Blake	Baker	The proposed changes to the agricultural code regarding equestrian facilities are being driven by a single aggrieved party and are NOT reflective of any issue impacting Kitsap County as a whole. The changes are unnecessary administrative and financial burden that do nothing to address or solve any actual problem facing the county and will only exist to stifle small business. These changes will single-handedly prevent any new equestrian business in the county through unrealistic setback and screening requirements, artificially limiting small equine operations to out-sized parcels of land. A single party's complaints should NOT be enough justification to drive an economic powerhouse of a community out of existence. The aggrieved party has SEVERAL other avenues to address their concerns (all of which should be a CIVIL matter) and are not dealing in good faith. I urge the county to roundly reject these proposed changes and work directly with the equestrian community to identify any actual issues facing the county.	Poulsbo	Washington
9/22/2025 8:31 PM	227	Beverly	Parsons	I am submitting this comment on behalf of the Kitsap Environmental Coalition working group focused on the Year of the Rural. Our focus is on the protection and health of our natural environment and all forms of life including but not limited to humans. We oppose the three reclassification requests. We will submit our reasons at a later time.	Hansville	Washington
9/22/2025 8:44 PM	228	Trish	Strong	i am writing to you as a manager of a large boarding stable and a horse owner. we house and take care of many horses and give families a safe and welcoming place to ride and enjoy their horses. Kitsap county has always been such an amazing place with a well diverse population its a perfect blend of people who enjoy a little bit if city life and a little bit of the rural county life. If people are limited to creating new horse properties that would be detrimental to this county. Horses are a needed entity that make this county such a wonderful place to be. They teach kids work and responsibility and help others thru hard times. My daughter asked her boss what made her want to hire her for the job and she said you have horses so i know you will have a good work ethic! i know not everyone likes the farm life but for those of us the live it daily- its not easy, its not glamorous, it can be miserable hot and freezing cold but we do it daily without hesitation because it means everything to us and its our way of life. Please reconsider these code changes and let us keep our Heritage and our way of life. thank you	Poulsbo	Washington

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				I am writing in opposition of the Equestrian Proposal. I am not only a life long Equestrian but am also mom of 2 horse crazy kids who take lessons twice a week where I've boarded my gelding and taken lessons at for over 15 years, and where we part lease a pony. We sold the last home/property we developed last summer and took a massive chance to buy our current land zone RR outside of Poulsbo- a lifelong dream come true. We are currently building our forever home and working with KCD to plan our farm for the time when my senior horse and a few others need a safe place to retire close to their owners. This Proposal effects the, now 22 y/o, horse I've raised from an 18 mo old, my kids favorite activity, my passion, my friends' business', and the property my husband and I have poured everything we have into that we purchased in the correct zoning for the above uses. 17.455.075 Equestrian facilities comments: As a real life example: Horses are herd animals and thrive when they are with other horses. To retire my horse to my 15 acres I would need to take on 2 additional horses but cannot afford to purchase 2 horses nor should I have to when so many in this area need retirement boarding. It is a common and reasonable solution to find two friends to board their retired horses on my land. I would now need an ACUP (17.455.075 Part A 1) for this. ACUP's in Kitsap county are known for being a LONG and complicated process in addition to the expense. How will the county handle the additional burden of permits? These two extra horses will now establish my backyard hobby farm as an Equestrian Facility (17.455.075 part A) so I would be expected to comply with 200ft setbacks (17.455.075 part B) for a paddock but only 50ft setbacks for a barn? Kitsap county has allowed me to clear just over a square 5 acres. The space left for a "paddock" (defined currently under 17.455.030 "definitions" as "a small enclosure used to house livestock" (Livestock defined in kitsap 17.455.030 as horses, bovine, sheep, goats, reindeer, donkeys, mules, llamas, and any other hoofed animal large and small. (small being 150 lbs of less), B- poultry, c ratites.)is not conducive for any horse to live. It is also where my home is already permitted to be. Having 2 boarding horses on my property would require me to obtain a farm plan through KCD (17.455.070 Livestock and dairy management and 17.455.075 Part G) . How is this funded? What is the upstafing and funding plan for KCD for the increased amount of farm plans that will need to be created? What will the time burden be for this? If a trainer comes to my land to teach a lesson do they need a CUP? Do I need a CUP? 17.455.075 Part F: Notes "the county shall require the following conditions of approval unless otherwise increased or decreased by the director or hearing examiner as necessary to deduce project impacts" Who are the "hearing examiners" and "director" are they experts in equine health and care? That only seems fair. (17.455.075 Part F continued) 1. Limiting horses to 1 per 1/2 acre. This makes it impossible for a boarding/lesson facility to cover costs. 2. hours of operation 8am-7pm: this is against best feeding practice for horses living in fields or stabled and would not allow managers/owners to do night checks for sick or injured horses or tend to sick animals at regular intervals as prescribed by veterinarians. 3.it is very difficult to screen all farm equipment completely. This opens up the space for a lot of complaints from neighbors, is the county prepared for this burden of time and manpower. 4. "Other restrictions, mitigations, and regulatory compliance measures as necessary to protect the public health, safety, and welfare." This is incredibly vague and if someone wants to complain about their RR neighbor using their property as zoned, their lawyer can easily find a way to sue based on this clause. Again opening the property owner and the county open to timely and costly legal proceedings. Additionally these proposed changes will be even more difficult for the boarding and lesson facilities in our area. They are already financially struggling with inflation and rising costs of keeping horses. They are now going to have to contend with what is known to be a long wait for CUP permits and struggle with the cost which will likely have to be passed to clients. Lesson/boarding barns do a huge service for the equestrian community. Farm owners, managers, and trainers are quine experts who run these facilities, they understand the sensitive nature of keeping horses and how to keep them healthy and happy, they have connections with farriers, vets, equine dentists, and feed and hay providers. They have people who clean stalls daily, and turn out horses for exercise. The have experience in tailoring feed and schedules for horses who need it and recognizing a sick and lame horse and acting on it. In addition to the horse welfare aspect of it, lesson programs teach adults and kids how to handle horses safely on the ground and safe riding practice. They help when horses need extra training and an expert eye to solve issues that often arise with horses. Many equestrians work 9-5 jobs- they are in healthcare, business, services boarding barns allow them a safe place to keep their horses whole still providing their skills to our community. Barns are a place people go to put down their phones and connect with animals and nature. They help to relieve stress and anxiety. All of these new proposals discourage new business from coming to Kitsap county by overregulating horses but no other types of livestock. As defined in the current ag code 17.455.030 definitions as horses, bovine, sheep, goats, reindeer, donkeys, mules, llamas, and any other hoofed animal large and small. (small being 150 lbs of less), B- poultry, c ratites.) 17.455.080: livestock and dairy management has no paddock setbacks. Please see Paddock definition: "paddock" (defined currently under 17.455.030 "definitions" as "a small enclosure used to house livestock". Why are horses being specifically singled out when all livestock by kitsap county definition have the same manure, run off, and dust rules. They are all supposed to follow BMP they all have the same foul smelling manure but only horses are being subject to these rules. Cattle ranches and dairy farms are up earlier then 8am to tend to their animals, their animals "paddocks" are up to property lines, and no one is proposing changing their regulations to the point they can no longer have animals on their land. I would also encourage you to go over this code with a fine tooth comb. This is a disappointing result of a 60% document. There are definitions that do not match between it and the ag code proposal (ex: agricultural use, primary- see the definition under the agricultural proposal and the equestrian proposal) , there are sentences that completely contradict themselves one right after the other (example equestrian proposal: "equestrian facility: . May offer occasional assembly events but is intended primarily for routine daily equestrian activities. Public events such as shows, clinics, or competitions are not included in a facility's routine equestrian activities and require separate review and permitting. There are also a lack of definitions in general, and also a lack of clear definitions. Example; Paddock, Hours of operation, "may offer occasional assembly events" define "occasional", what are the qualifications of "director or hearing examiner" as related to horse care/management. I am quite experienced in reading code in this county and this code is not of the same quality I am used to seeing. All of this opens Kitsap county and equestrians to being sued. None of us can afford that right now. Lastly, I would like to voice my concern about not involving equestrian stakeholders to the table until we forced it at a meeting in September. The ag committee of stakeholders was formed in 2024 to work on their proposal. Yes the county has voiced they did "send out some emails and no one answered... this is not a good faith effort. Send some more, have an ag member call their friends in the equestrian community. These actions are not in line with the WA State Comprehensive Plans: ensure public participation: RCW 36.70A.140 nor in the "kitsap county comprehensive plan update 2024, Public Participation Plan" (this does not have code numbers to reference). I also have concern as to how all of these changes relate to the WA state Right to Farm Act. I would like to see equestrian activities continue to remain part of the code as it has since 2006 and not be pulled out with a separate and inequitable set of rules from other livestock. If this is turned down, I implore Kitsap County allow the equestrian community more time to work with Kitsap county planners to ensure a fair, equitable, and safe equestrian code.		
9/22/2025 8:48 PM	229	Anne	Braddock		Poulsbo	Washington
9/22/2025 9:09 PM	230	Judy	Hartness	Against equestrian rezoning regulations!	Poulsbo	Washington
9/22/2025 9:22 PM	231	Michelle	Heyser	Please abandon all zoning changes related to equestrian facilities.	Bremerton	Washington

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Date Submitted	Id	Name First	Name Last	Comments	City	State
9/22/2025 9:24 PM	232	William	Watson	I am submitting these comments as a long time horse owner (20 years) located in Kitsap on a farm residential property where I intend to retire our horse at home and potentially board one or two additional horses. I am directly impacted by the proposed code updates. First, the process used to draft these updates was flawed. The agricultural working group was convened more than a year ago, yet no equestrian working group was formed until after widespread public outcry. This lack of parallel process resulted in code language that is rushed, error-ridden, and unvetted by those most affected. Such a procedural imbalance alone should be grounds to pause or reject the equestrian code updates. The draft language is also internally inconsistent and poorly coordinated. For example, the definition of "Agricultural Use, Primary" is written differently in the agriculture draft and the equestrian draft, despite both being proposed simultaneously. This creates contradictory standards and gives the appearance of deceptive drafting. In addition, updates to KCC 17.455.070 (Livestock and Dairy Management) appear only in the equestrian draft, though logically they belong in the agriculture draft. These errors reflect a lack of even preliminary review for accuracy, quality, or completeness. Several proposed standards are unworkable. The term "paddock" is poorly defined; the code currently defines it only as "a small enclosure used to house livestock," with no guidance on when an area becomes a field, arena, or pasture. Yet only horse paddocks are singled out for restrictions, while paddocks for cattle, goats, or sheep face no such limitations. The proposed 200-foot buffer from paddocks is similarly unreasonable. On a 5-acre property measuring 266 feet by 266 feet, this would leave only a 66-foot square area for paddocks, effectively prohibiting equine use on such parcels. The introduction of "operating hours" is equally arbitrary and incompatible with the realities of animal care. Does this mean horses cannot be fed before 7 a.m., that emergency veterinary care cannot occur after 8 p.m., or that a sick horse cannot be checked during the night? What happens if a late ferry or traffic delay forces a horse being trailered home? These restrictions are unenforceable and disconnected from practical equine management. Furthermore, the code fails to address how multi-parcel facilities will be treated. A horse property spanning multiple tax parcels could be subjected to contradictory enforcement depending on parcel boundaries, with no clarity on whether the operation is considered one facility or several. The proposed nuisance and health standards deepen the confusion. The draft states that applicants must demonstrate that odor, dust, noise (including amplified sound), and drainage will not constitute a nuisance, hazard, or health problem to adjoining properties. However, "nuisance," "hazard," and "health problem" are not defined anywhere in the code. Without objective standards, enforcement will be subjective and arbitrary, leading to disputes between neighbors and inconsistent County rulings. More importantly, this requirement directly conflicts with existing protections in KCC 17.455.100 (Right to Farm and Notifications), which explicitly declares that agricultural operations in conformance with best management practices "are not a public or private nuisance under this code," and that no agricultural operation "will be considered by Kitsap County to be or become a nuisance by any changes in or on the surrounding land." These provisions implement the Washington State Right to Farm Act (RCW 7.48.300), which grants broad statewide protections. The proposed equestrian standards flatly contradict these protections, carving out horses for special treatment and exposing the County to equal-protection and takings challenges. These contradictions, vague terms, and arbitrary restrictions create serious legal and enforcement risks. County staff will be left unable to consistently interpret terms like "paddock," "operating hours," or "nuisance." Landowners will face uncertainty in how to comply. The result will be confusion, loss of trust, and wasted taxpayer resources defending poorly drafted provisions. In conclusion, the proposed equestrian code updates are procedurally flawed, internally inconsistent, and legally indefensible. They contradict both the Comprehensive Plan's recognition of equestrian uses as part of Kitsap's rural heritage and the County's and State's own Right to Farm protections. These provisions should be rejected outright. At a minimum, adoption must be paused until a proper equestrian working group—equal in scope and process to the agricultural group—develops clear, consistent, and enforceable recommendations. If adopted in their current form, these provisions will harm Kitsap's rural character, undermine long-standing agricultural protections, and waste taxpayer resources on avoidable disputes.	Poulsbo	Washington
9/22/2025 9:25 PM	233	Evan	Burnette	My wife and I just bought a clear 5 acres in Kitsap County in January and we're planning on turning it into our forever home and a horse facility. It's just a dream right now, but these proposed code changes threaten that dream. The lack of community outreach from the county government is completely unacceptable. This proposal was based on a single dispute and rushed through without input from the community it affects the most. I am extremely disappointed. You work for the people of this county, not just a few loud individuals.	BREMERTON	Washington
				To meet the county's stated goal of "Retaining rural character of the county outside of designated UGAs", I urge the county to drop all of the proposed zoning changes that burden equestrian facilities and strengthen the provisions against nuisance claims, which already have protections in the State's Right to Farm Act RCW 7.48.305 and Kitsap County code 17.455.100. The increase in cost of living has already priced out many county residents from purchasing private farms. The average person relies on equestrian facilities to be able to keep horses. Equestrian facilities serve as unique community hubs that preserve and share rural culture with our youth, veterans, people with disabilities, and the broader community. The number of horses in Washington state has already declined 15% from 2017 to 2022 (source nass.usda.gov). Most equestrian facilities already operate on paper thin margins, and are kept running by a labor of love. Any increase in cost or regulatory burden would threaten the economic viability of the industry. If the county wants horses to be grazing in kitsap county 50 years from now, they need to act immediately to remove these zoning changes. The proposed zoning changes in 17.455.075 are in conflict with the State's Right to Farm Act RCW 7.48.305 and Kitsap County's own protections against nuisance claims in 17.455.100. 17.455.030 This distinction protects property owners who can afford their own land while forcing lower-income horse enthusiasts to rely on increasingly regulated and expensive boarding facilities, further perpetuating a class-based barrier to equestrian participation. Small clinics and informal shows are the most accessible and affordable way for beginners and families to learn horsemanship—requiring separate permits for these grassroots activities prices out the very people rural equestrian facilities are meant to serve. 17.455.075.A This is overly burdensome, especially to small family-run operations that board small numbers of horses		

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9/22/2025 9:35 PM	234	Anna	Dukes	The distinction between "boarding-only" and other services can be fluid, and changes based on stall availability. It's not uncommon for a barn to rent 5-10 stalls out to a trainer. Sometimes the trainer will move their program, and the barn owner may go back to boarding directly to clients. It is a common practice for trainers to travel to where their students keep their horses. Would this be allowed at "boarding-only" facilities? Not all horse owners have their own truck and horse trailer, so if a facility owner had to ban outside trainers this would limit the boarders access to instruction. Horses can be very dangerous, and limiting instruction will get people hurt. I do not support requiring permits of any type to operate equestrian facilities within rural zoned areas. 17.455.075.B The proposed 200-foot setback for paddocks and manure storage is unworkable for small and mid-sized properties. Many rural parcels in Kitsap are under 5 acres; this requirement effectively bans equestrian facilities on them, contradicting the County's intent to allow small-parcel agriculture. There should be no setbacks for paddocks as long as the farm is following best management practices, which includes regularly removing manure from the paddocks (~daily). I support a 50 foot setback for manure storage that is allowed to be reduced as specified by a farm plan signed off by the Conservation District 17.455.075.C I do not support limiting access to facilities with direct access to a county road. Private roads are very common in the rural areas of our county. It should be removed. 17.455.075.E This requirement is in conflict with Right to Farm Act (RCW 7.48.305), which specifically protects agricultural operations from nuisance claims when following accepted practices. It should be removed. 17.455.075.F.1 A flat "one horse per half-acre" density limit ignores site-specific management practices and unfairly penalizes small landowners. It should be removed. 17.455.075.F.2 Restricting hours of operation to 7:00 a.m.–8:00 p.m. disregards the reality of horse care, which requires flexibility around feeding, vet care, and training schedules. It should be removed. 17.455.075.F.3 This requirement forces expensive landscaping and screening installations on functional agricultural operations, prioritizing suburban aesthetics over practical farm management and adding significant costs that many small horse operations cannot afford. It should be removed. 17.455.075.F.4 This open-ended provision gives officials unchecked authority to impose any future restrictions they deem necessary, creating unpredictable compliance costs and regulatory uncertainty that makes it impossible for facility owners to plan or budget for operations. It should be removed. 17.455.075.G The Conservation District has built decades of trust by working cooperatively with farmers through education and voluntary assistance—forcing them into a regulatory role undermines this collaborative relationship and turns a valued partner into another permitting obstacle that property owners must navigate. It should be removed. 17.455.075.H Requiring new permits for any expansion or operational changes prevents property owners from adapting to market demands, evolving their business models, or making improvements—effectively freezing operations in place and killing long-term economic sustainability as the equine industry changes. It should be removed. The degree to which these proposals demonstrate lack of understanding of the local equestrian community is hard to overstate. The community did not have a chance for our voice to be heard during the development of these regulations until it was already out the door. This has severely damaged trust between the equestrian community and the county. The only way to rebuild that trust is to cancel all of the proposed changes, give us some time to cool down, and start the process over with proper engagement from the start.	Bremerton	Washington

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9/22/2025 9:47 PM	235	sommer	rose	abandon all zoning changes related to equestrian facilities	port orchard	Washington
9/22/2025 10:17 PM	236	Sean	Reichle	As a 4-H volunteer leader, I am strongly opposed to the proposed changes to the Kitsap Zoning Code Equestrian Center Standards and Regulations. These revisions would make it extremely difficult—if not impossible—for me to host youth 4-H equine events on my property. The financial and logistical burdens imposed by these changes would effectively end my ability, and that of many other volunteer leaders, to support the growth and development of Kitsap County's youth through equine programs. The draft definition of "rural character" emphasizes support for traditional rural lifestyles and rural-based economies, including farming, horseback riding, and forestry, while preserving community identity and shared traditions. These proposed changes directly conflict with that definition. Specifically, the changes would negatively impact me in the following ways: •Requiring a Type III Conditional Use Permit for all 4-H meetings and events, as they would no longer be considered an accessory use. •Mandating that paddocks and manure storage be located at least 200 feet from any property line—an impossible standard on my 4-acre property. •Imposing the burden of proving that odor, dust, noise, and drainage do not constitute a nuisance, without providing a clear framework for demonstrating compliance. •Requiring the development of adequate parking and loading spaces, which would be costly and unnecessary for small-scale youth events. •Mandating visual screening of parking areas, manure storage or disposal areas, and equipment storage from adjoining properties—essentially requiring me to screen off my entire property. This contradicts the open views and natural aesthetics that define rural living. For these reasons, my family does not support any of the proposed changes. These regulations appear to be a solution in search of a problem—one that does not exist. I urge decision-makers to reconsider these proposals and preserve the ability of community volunteers to continue enriching the lives of Kitsap County youth.	Port Orchard	Washington
9/22/2025 10:25 PM	237	Jessica	McCullough	Putting such restrictive regulations on horse farms and properties will greatly affect not only the individual, but the community as a whole. Small business mom and pop horse barns are places for people (a lot of times young youth) learn respect, empathy, care, and responsibility. They are a safe space for teens to do something productive and connect with another living creature. The equine world is not always affordable and these small businesses are a way for those who do not have a lot to still find a way to be a part of the equine world. By taking away the rights they have and imposing such strict regulations for them to abide by to be a business, the county will be choking out and essentially getting rid of the small businesses. Most bigger horse operations might not be able to continue either due to the set back requirements. If all of the small equine businesses in the area get shut down that will majorly affect the economy in the area by driving peoples riding businesses out of our county and into others. This will affect property values majorly as well as having a developed horse property increases home values in our area at the moment but if these changes go into affect that will eliminate most peoples and properties abilities to operate as originally intended, thus rendering the value of the property and improvements diminished. I stand against the changes trying to be imposed that affect equine properties.	Port Orchard	Washington
9/22/2025 10:33 PM	238	Jennifer	Garis	I am writing to express my strong opposition to the proposed Horse Facilities Draft Code outlined in the Year of the Rural website. While I understand the intention behind regulating facilities that provide equine-related services, the draft code in its current form presents serious concerns and would have devastating consequences for our community. One of the most alarming aspects of this proposed code is its potential to close down almost all of the existing equine riding facilities that provide invaluable services, including horseback riding lessons for young riders and therapeutic programs for veterans and individuals with disabilities. These programs are not only a source of recreation but also serve as a lifeline for many people, offering both physical and emotional benefits that are hard to replicate through other means. Impact on Young Riders: For many children, horseback riding lessons are not just a fun activity, but a key component of their development. I have seen first hand the life lesson and positive qualities it has already instilled in my daughter at a young age. She is learning courage and how to control her fears. She is learning patience and the art of silent communication. She is learning to trust herself and her intuition on top of discipline and responsibility. She is learning she will always have a shoulder to cry on and she will know love. She is learning how to be gentle while also being a consistent leader. She is learning to love nature and the outdoors and how to ground herself in a chaotic world. She is learning how to polish up and be presentable, but also that it's ok to get dirt under her nails. She is learning to fall and fail and to get back up and keep trying. For children with special needs, these lessons can have a profound impact on their social skills, mobility, and self-esteem. Closing these facilities would deprive future generations of these critical life-enriching experiences. Impact on Veterans and Individuals with Disabilities: Equine therapy is an established form of treatment for veterans coping with PTSD, anxiety, depression, and other mental health conditions. It is also an important therapeutic option for individuals with disabilities, helping to improve motor skills, balance, and cognitive function. The proposal would close most of these facilities and take away a proven method of rehabilitation and healing for some of the most vulnerable members of our society. Economic and Social Consequences: Beyond the direct impact on individuals who rely on these services, the economic ripple effect could be severe. Many of these facilities are small businesses that contribute to the local economy, provide jobs, and create a sense of community. Closing them would not only harm those who use the services but also disrupt the livelihood of those employed in the industry and the broader network of support businesses they rely on. I urge you to reconsider the provisions of this draft code that threaten the existence of these essential equine programs. I believe that with thoughtful amendments, it is possible to balance the need for regulation with the need to protect the welfare of these facilities and the individuals they serve. Please consider the broader social, emotional, and economic costs before making any decisions that would limit access to such vital resources. Thank you for your time and attention to this critical matter.	Silverdale	Washington
				Subject: Objection to Proposed Changes to Rural Code Regarding Equestrian Facilities Dear Members of the Planning Commission and Board of County Commissioners, I am writing to respectfully object to the proposed changes to Chapter 17.455 (Agriculture Code) of the Kitsap County Zoning Code, specifically the addition of Section 17.455.075 regarding equestrian facilities. Although it may not be the intent, I believe that the practical effect of this code section as currently proposed will be to shut down nearly all equestrian facilities in rural Kitsap County. This would have a disproportionate impact on small-business owners and would be highly detrimental to the community. Equestrian facilities are not only small businesses, they are community assets that provide meaningful opportunities for youth and adults alike. Horseback riding builds responsibility, discipline, and confidence, while also fostering a strong connection to nature and animals. Hundreds of riders in Kitsap County have found equestrian activities to be an essential source of belonging and personal growth. In my own case, over the last several years I have watched as the countless hours my daughters have spent at the barn has given them much more than just the ability to ride a horse—it has shaped who they are. The daily care of their horses has taught them responsibility, patience, and compassion in ways that few other experiences could. They've learned that hard work and consistency matter, whether it's cleaning stalls, grooming, or late nights polishing tack before a show. Competing has shown them both the joy of success and the humility of setbacks, and through it all, they've gained confidence, resilience, and grace.		

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9/22/2025 10:44 PM	239	Matt	Topham	Most of all, the bond they've built with their horses has given them a sense of partnership, trust, and love that will stay with them forever. The overly restrictive regulations on equestrian facilities that are being proposed in Kitsap County threaten to remove these opportunities for my daughters and many, many others. The proposed requirements, in particular the restrictive distance requirements for paddocks and manure storage and the limit on the number of horses would place an overwhelming financial and logistical burden on these businesses. Unlike large corporate facilities, small equestrian operators (which I believe is the case for most of the equestrian facilities in Kitsap County), often lack the resources to absorb such costs and the property to meet these requirements. These regulations, if implemented as written, would effectively drive many local equestrian centers out of business, reducing both economic activity and community services in the county. I fully understand and support the need for reasonable regulations that balance the interests of equestrian facilities with those of surrounding property owners. For example, reasonable hours of operation, best management practices for manure and dust control, and requirements for safe ingress/egress seem fair and appropriate. But in my experience, the operators of most equestrian facilities in Kitsap County are very conscientious about being good neighbors and are already meeting these requirements. The proposed regulations appear to go far beyond what is reasonably necessary and function as a blunt instrument, punishing responsible equestrian facilities along with the few who may have created problems. By layering multiple high-cost and restrictive requirements, the County risks eliminating nearly all equestrian facilities rather than ensuring they are responsibly operated. Rather than setting unachievable setbacks and unrealistic caps on horse numbers that would cripple legitimate operations, the focus should be on addressing the specific issues caused by what I suspect is a very small number of facilities. These situations can and should be managed through more narrowly tailored regulations and consistent enforcement, which would protect the community from genuine concerns while still allowing equestrian facilities to thrive and continue providing safe, well-managed spaces for horses and riders. I trust and anticipate that the County will conduct thorough due diligence to fully understand the practical impacts of these proposed regulations and ensure they do not unintentionally cause more harm than good. It is vital that any policy changes protect the broader interests of the community and do not undermine the viability of equestrian facilities that provide recreation, education, and economic value. I also expect that the County will actively engage in open and constructive dialogue with the owners and operators of these equestrian facilities, working collaboratively to strike a thoughtful balance that addresses legitimate concerns while preserving the long-standing benefits equestrian activities bring to the area. Thank you for your time and for considering the deep impact this proposal will have on our community. Sincerely, Matt Topham	Bainbridge Island	Washington
9/22/2025 11:56 PM	240	Tanya	Thompson	Tanya Thompson Owner & Head Coach, Gamble Creek Stables Pony Club Riding Center 4493 NE Stevens Uhler Rd Poulsbo, WA 98370 Phone: 360-632-7110 September 23, 2025 Kitsap County Planning Commission 614 Division Street, MS-36 Port Orchard, WA 98366 Subject: Opposition to Horse Facilities Draft Code Dear Commissioners, My name is Tanya Thompson, and I am the owner of Gamble Creek Stables Pony Club Riding Center. Our facility is home to 27 horses and serves 46 students who ride one to two times per week. Our riders range in age from 4 to 70, with the majority being school-age children attending Bainbridge Island, North Kitsap, and Central Kitsap schools. We specialize in sport psychology, Pony Club education, and three-day eventing. Many of our students go on to earn scholarships and ride on intercollegiate equestrian teams — a testament to the foundation they build here. Beyond competitive success, our programs teach children life lessons in courage, discipline, empathy, responsibility, and resilience. The new draft code language would close our doors, displacing more than 40 young riders and 27 horses. This loss would not only dismantle our barn community, but also ripple through the broader small business network that supports us — veterinarians, farriers, feed stores, and local suppliers. To my knowledge, the proposed rules would effectively shut down every lesson barn in Kitsap County. This is especially troubling given that Kitsap County has one of the highest horse-to-person ratios in the United States. Horses are not only a part of our community fabric today, but also deeply tied to our heritage. The farm we call home has been operational since the 1890s, supporting generations of agricultural and equestrian activity. I respectfully urge the Planning Commission to reconsider this proposal. It is possible to craft regulation that ensures safety and accountability without eliminating the very programs that serve children, families, and our rural economy. Closing equestrian lesson facilities would create social, educational, and economic harm that far outweighs any intended benefit. Thank you for your time and thoughtful consideration of this critical issue. Sincerely, Tanya Thompson Owner, Gamble Creek Stables Pony Club Riding Center	Poulsbo	Washington
9/23/2025 3:50 AM	241	Mike	Wilke	Stop all attempts to rezone horse property	Port orchard	Washington
9/23/2025 6:06 AM	242	Tammara	Boyles	Dear Commissioner, I am writing to express my concerns on behalf of Gamble Creek Stables Pony Club Riding Center and other equestrian facilities that will be impacted by the proposed code changes. Although my family has relocated from Kitsap County due to military orders, our dedication to the community and its riding centers remains steadfast. Our children travel to Gamble Creek for their Pony Club activities, and we aspire to return in the future so they may continue their equine education in an exceptional riding facility. The new language in the draft code presents significant challenges for riding centers, which could result in closures and the displacement of numerous horses and participants, encompassing both children and adults. Research has indicated that horse riding serves as a therapeutic activity, functioning as both a sport and a form of emotional support. It encourages children, adults, and families to engage with the outdoors, fostering a lifestyle less reliant on electronic devices. To exemplify this, I wish to share my daughter's experience with severe dyslexia. Despite receiving years of tailored tutoring, she struggled to achieve substantial progress. Given our family's background in equestrian activities, we considered horse riding as a potential alternative educational therapeutic approach. Studies have consistently shown that riding can enhance the development of neurological pathways between the left and right hemispheres of the brain, addressing one of the fundamental issues associated with dyslexia, namely the inefficiency of communication between brain hemispheres. At Gamble Creek Stables, we discovered a nurturing community where riding has notably enhanced the lives of many students. Under the mentorship of Tanya, both my daughter and son have become enthusiastic riders, engaging in lessons twice a week and participating in care responsibilities such as mucking stalls and tending to the horses on other days. Facilities of this nature impart invaluable life skills, fostering responsibility, accountability, and improved mental health by alleviating symptoms of depression and anxiety while simultaneously building self-confidence. Many students who participate in riding programs subsequently excel in competitive environments, often joining intercollegiate teams and earning scholarships that facilitate the pursuit of their academic and equestrian aspirations. I respectfully urge the council to reconsider the proposed code in its current form. It would be advantageous to collaborate with local riding centers to formulate a code that prioritizes equine safety and welfare while enabling these essential facilities to maintain their operations and serve their communities effectively. Thank you for your attention to this vital matter. Sincerely, Tammara Boyles	Suffolk	Virginia

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9/23/2025 7:14 AM	243	Robin	Salthouse	It's important that the Rural Resource Lands Chapter of the Comprehensive Plan remain a separate chapter. These goals, plans and strategies are vital to guide, maintain and protect the right balance of rural areas in Kitsap County for the health and well-being of natural resources, animals and people. I appreciate the work that has been done to create this chapter, and have the following suggestions and concerns. The draft does not provide enough specifics on enforcing policies. A specific schedule is needed to monitor project progress with: initial, intermediate, and final project reviews. The chapter does not mention any consequences for violations. 1. In order to understand critical areas, and wildlife corridors, Kitsap County will need clear and detailed mapping and access to this data. 2. In the Rural Development section (p. 17-18) planning to perform a regularly updated Rural Lands Analysis is a good strategy. Unfortunately the second strategy in this section does not mention policy enforcement or violation consequences. 3. Forest lands (p. 19) Include community members in the proposed Forestry Advisory Council. Any county advisory council should have a full range of stakeholders. The work coming out of these groups impacts all people living in the county. 4. Ensure LAMRID boundaries (p. 21-22) are maintained. Lack of enforcement will lead to sprawl and negate the efforts to maintain healthy rural areas. 5. Rural Environment goals (p. 22) are important and should be given priority over other policy categories to protect all living things. Clear and enforceable codes must be developed and referenced to show Kitsap County is serious about protecting our rural lands' future. Please continue to improve your good work so far. Thank you.	Kingston	Washington
9/23/2025 7:41 AM	244	Carrie	Carollo	No changes, just leave them alone	Silverdale	Washington
9/23/2025 7:42 AM	245	Lisa	Chambers	Leave farmers/ranches and horse property alone. Do not add additional restrictions.	Kingston	Washington
9/23/2025 7:55 AM	246	Kharissa	Hamilton	I have been a lifelong resident of Kitsap County, raised on a working horse stable that my family built and developed into a small but thriving business. That upbringing provided me with opportunities to travel throughout the Pacific Northwest, showing horses and learning skills that shaped my character: discipline, responsibility, and respect for animals. Those early experiences gave me the foundation to later support my own family. When my father retired, we transitioned the stables into a new venture: small-scale farming. Today, my children ride their own horses, show livestock across the region, and are learning critical skills in agriculture and food sustainability. These lessons are not only invaluable for their future, but they also contribute to the resiliency of our local food systems. It is important to emphasize that such opportunities cannot be replicated in a housing development. Access to agricultural land is increasingly rare. I am fortunate that generations before me made deliberate choices to preserve property for farming and animal husbandry. However, many families in our community will never have that chance unless they can utilize boarding stables or small farms. Without these businesses, countless youth will be denied the opportunity to engage with agriculture, animals, and the work ethic that comes with them. The current proposal is short-sighted and fails to consider its broader impact on small equine and agricultural operations. By creating financial and regulatory barriers that undermine sustainability, this proposal accelerates the conversion of farmland into development, a trajectory that runs counter to the long-term interests of the county and its residents. For years, Kitsap farmers have requested the formation of an Agriculture Advisory Committee, yet no such committee exists. Establishing this body is essential before any further code changes are considered. An advisory committee would serve as a bridge between property owners, agricultural operators, and county officials, ensuring that the perspectives of those most affected are included in policymaking. As property owners, business operators, and stewards of our community's rural heritage, we deserve a seat at the table in shaping policies that affect our livelihoods and the future of agriculture in Kitsap County.	Silverdale	Washington
9/23/2025 7:57 AM	247	Lisa	Poole	Please seat the Ag Advisory Council and defer any Ag code updates until this advisory council can give input. The proposed changes sound terrible and not in the best interest of Kitsap County.	Seabeck	Washington
9/23/2025 8:03 AM	248	Kimberly	Roberts	Kitsap County Planning Commission 614 Division Street, MS-36 Port Orchard, WA 98366 Subject: Objection to Proposed Changes to Rural Code Regarding Equestrian Facilities Dear Members of the Planning Commission and Board of County Commissioners, I am writing to respectfully object to the proposed changes to Chapter 17.455 (Agriculture Code) of the Kitsap County Zoning Code, specifically the addition of Section 17.455.075 regarding equestrian facilities. I believe the practical effect of this code section, as currently proposed, will almost certainly eliminate many equestrian facilities in rural Kitsap County. This would disproportionately impact dedicated horse owners like myself, the facilities that cater to us, and the broader community. I strongly disapprove of this proposed change, as it appears to be poorly considered and lacks a realistic understanding of the equestrian landscape in Kitsap County. As an adult rider at Gamble Creek Stables and Pony Club, where I board my horse(s), I have experienced firsthand the immense value these facilities bring to our lives. While I own a 5-acre parcel in North Kitsap, the cost and complexity of building a suitable horse barn, combined with the existing extensive permit process, make it financially impossible for me to house my horse on my own property. Boarding is my only viable option. Equestrian activities offer far more than just a hobby; they provide a unique form of exercise, mental stimulation, and a deep sense of community. The proposed regulations threaten the accessibility and affordability of these benefits for countless horse owners in Kitsap County. Boarding my horse(s) at Gamble Creek Stables allows me to pursue my passion for riding while ensuring their well-being. I deeply appreciate the strong sense of community among the boarders and the positive environment for the kids receiving riding lessons. It's vital to recognize that Gamble Creek functions as more than just a boarding facility. It provides crucial riding lessons and training, offering young people in our community the opportunity to learn about horsemanship, responsibility, and build self-confidence. These programs also open doors for young riders to earn scholarships, which would be jeopardized by these changes. The proposed requirements would place an overwhelming and unsustainable burden on stables like Gamble Creek and force them to cease leaving horse owners with virtually no boarding options and severely diminish riding programs available to our youth. Furthermore, the ripple effect of these closures would significantly impact related small businesses such as veterinarians, farriers, tack shops, and farm stores. I hope the County will choose to conduct thorough due diligence to understand the impacts of these proposed regulations and ensure they do not unintentionally cause more harm than good. It is crucial to protect the broader interests of the community and avoid undermining the viability of equestrian facilities that provide recreation, education, economic value, and vital opportunities for our youth. I implore you to reconsider these regulations and engage with the equestrian community to find a solution that supports both responsible horse ownership and the preservation of these valuable community assets. Thank you for your time as this proposal will have a negative impact on equine industry in Kitsap County. Kimberly Roberts Kingston, WA roberts7858@gmail.com 360-621-7210	Kingston	Washington
9/23/2025 8:37 AM	249	Eric	Schwartz	Please do NOT pass the proposed changes to the Equestrian Centers Standards and Regulations. We have too much governmental control over our lives already.	Poulsbo	Washington
9/23/2025 8:44 AM	250					
9/23/2025 9:03 AM	251	Celia	McMartin	One of joys of Kitsap county is it's rural character. driving by cows, barns, horses, goat, alpacas, and llamas....how lucky can we be! please don't remove the burden the small livestock and horse paddocks by burdening the owners with rules. if someone does not like a horse pasture near their home, don't open a business or build a house next to it.	kingston	Washington

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9/23/2025 9:05 AM	252	Joanna	Ruzanka stuen	Thus proposed zoning change is misguided in several ways. Number one, if a landowner wants or needs to sell their small backyard horse property, it will not be any good to a purchaser who wants to board a few horses, or teach a few lessons. By making this zone change a blanket provision, land use is limited by governmental regulations. Saying that a small property is grandfathered is misleading, because one noise, light, dust complaint and the horse owner is vulnerable. Also, to make all existing boarding, training, lesson facilities abide by the new zoning is ridiculous. There are many properties that only teach for the love of the animal and for equine activities, not to mention caring for the next generation of equestrians. They don't have the resources to own a huge piece of land that would allow 200 foot buffers (! Who came up with that STUPID idea? A scotch broom advocate? Or maybe a tansy ragwort advocate?I mean, please explain) Why were there not members of the equestrian community involve in the advisory committee? I could go on. Lights, hours of operation, conditional use permits, etc. please get a task force going that includes members of the equine community and extend the adoption of any new zoning changes until these matters are addressed.	Port orchard	Washington
9/23/2025 9:15 AM	253	Bethany	Bauthues	I am writing to ask that you not adopt the proposed changes to the code for equestrian facilities. I am a Kitsap County taxpayer and resident, and the mom of an animal loving girl, who wants to be a veterinarian some day. My middle-school daughter has anxiety, and the farm where she rides horses and volunteers is one of the few places she can comfortably interact with people. She finds the large schools in our area, and the other clubs and social activities available to be overwhelming. The farm provides a much needed break from large groups of people, technology and the fast pace of modern life, and allows her to connect with animals. Our family is not in a position to be able to own a horse, and it is a financial stretch to be able to do lessons. Even though the current code proposal is not retroactive, and would not immediately affect this farm, long-term these rules would be a barrier for farms to expand or new facilities to enter in the horse business. As existing owners retire from the business, rising costs would mean fewer kids are able to access those that are able to comply. The farms that are currently providing the most accessibility to lower income and middle class families, are already barely getting by. Codifying these barriers to small equestrian facilities is a move in the wrong direction. The county provides parks and facilities for many youth activities, but none that put youth in connection with animals, and the land in the way that small farms do. In our growing community, access to nature is dwindling, and this will have long-term effects on the health of our youth. Please consider policies that foster agricultural, and equine recreation in our county. What could the county do to expand access to farms and horses to even lower income kids?	Silverdale	Washington
9/23/2025 9:16 AM	254	Melissa	Aguilera	Please do not destroy the horse community! Equine options are already limited, expensive and shrinking! People deserve the chance to continue their heart and soul built projects, barns, training, 4-h etc! As a realtor I know property values would also be affected by this AND thus property tax revenue if values drop. Please do the right thing which is NO CHANGE	Gig harbor	Washington
9/23/2025 9:35 AM	255	Dan	Berry	I don't have the proper words to tell you how incredibly disappointed I am that the county is proposing this code restriction. I am an avid horse lover's papa. My daughter and her best friend run a small equine business. Lessons, love, compassion, care, and kindness are just a few of the things students learn through the amazing bond of a horse and partner. I see first-hand what horses can do for every age and every ability. They are truly care-takers and healers. The thought of the county taking that away is beyond disbelief. Do not implement these codes. From a father, son, brother, papa and friend to all those that also love their animals and equine facilities.	Poulsbo	Washington
9/23/2025 9:40 AM	256	Kathryn	Bauthues	Hi, I'm a thirteen year old who struggles with school because of the people and atmosphere, and going to the farm and riding really helps me. The farm is one of the only places, aside from my house, where I truly feel comfortable. Because of this, I would hate to see it made harder for others to ride, or just be at a farm in general, in future.	Silverdale	Washington
9/23/2025 9:53 AM	257	John	Meekins	Dear Commissioners, I am writing to express my strong opposition to the proposed reclassification of land use in Kitsap County that would impose new limitations on keeping horses. As a resident deeply connected to our community's rural heritage and the therapeutic value of animals, I believe this change would have detrimental effects on families, individuals in need of support, and the overall well-being of our county. Growing up on a farm, I was immersed in the world of animals from a young age. Horses, in particular, were a constant presence in my life—helping with daily chores, providing companionship, and teaching invaluable lessons in responsibility and empathy. Alongside horses, I cared for a variety of other animals, including cows, chickens, and goats, which shaped my understanding of the profound bond between humans and animals. This background has given me a firsthand appreciation for how integral horses are to rural lifestyles and community health. Throughout my experiences, I have witnessed the transformative power of horses in therapeutic settings. I've seen autistic children find calm and improved communication through equine-assisted activities, where the gentle nature of horses helps build trust and social skills. Similarly, I've observed blind adults gain confidence and independence by forming partnerships with these animals, navigating spaces with a sense of freedom that other therapies couldn't provide. And in countless situations involving individuals with PTSD—whether veterans, survivors of trauma, or others—the rhythmic motion of riding and the non-judgmental presence of a horse have offered solace and healing that traditional methods often fall short of achieving. These are not isolated anecdotes; they reflect a broader truth about the role horses play in mental and physical rehabilitation. By limiting the availability of horses through restrictive land use reclassifications, Kitsap County risks diminishing access to these vital resources. Many residents rely on local stables, farms, and equine programs for therapy, recreation, and emotional support. Such restrictions could force families to relocate animals, increase costs for boarding, or even abandon horse ownership altogether, ultimately reducing the help available to those who need it most—our children, adults with disabilities, and community members struggling with mental health challenges. I urge you to reconsider this reclassification and prioritize policies that preserve our county's equestrian traditions while supporting the therapeutic benefits horses provide. Let's work together to ensure Kitsap County remains a place where animals and people can thrive side by side. I would welcome the opportunity to discuss this further or provide additional insights from my experiences. Thank you for your time and consideration. Sincerely,	Port Orchard	Washington

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9/23/2025 10:39 AM	258	Paula	Scott	In response to the proposed code changes in Chapter 17.415 Allowed Use Standards, 17.415.17 Equestrian Facility and Chapter 17.455 Agricultural Code I support the expanded definition of Agricultural use,” primary,” to include equestrian facilities, in 17.455.030. I also support returning horse boarding facilities, “Equestrian Facilities” to the conditional use process. My reason for support of the return to the conditional use process is not all neighborhoods or properties in the RR zone are compatible with Equestrian Facilities. An example of unsuitability for commercial use are neighborhoods that share one lane private roads. An Equestrian Facility is a commercial use with increased traffic volumes and use of heavy vehicles that impact property owners that rely on the one lane road for their ingress and egress. Returning horse boarding facilities, “Equestrian Facilities” to the conditional use process will allow the neighboring property owners to ask questions and voice their concerns. The current Agricultural Code does not provide protection for property owners when a commercial venture opens in the neighborhood. There are no safeguards for the property owners when the commercial venture, “horse boarding facility”, enlarges their operation or adds commercial sales of hay, straw, etc., to their business. The current agricultural code lacks clear definitions or wording relating to expansion of a horse boarding facility or adding commercial sales. In a real-life example, Roundup Lane is a one lane road serving 14 properties, including a horse boarding facility that sells hay, straw, bedding materials and other commercial items that are imported from a county that is not neighboring Kitsap County. This use has been allowed and grows due to the fact the Agricultural Code does not have clear definitions of; agrotourism, accessory use, excess hay, etc. As a result, this facility has a negative impact on the property owners that were there before the facility was opened. The one lane road is overburdened by the commercial traffic, semis loaded with hay/straw, etc., customers coming in to purchase the commercial products, boarders coming in and out to care for their animals and vehicles with horse trailers. The one lane road that was designed for normal passenger traffic is breaking down by the increased traffic volumes and weight of the commercial vehicles. The property owners are not protected from dust, rodents, flies and odors coming from the commercial facility. I support agriculture and horse boarding facilities, but I also support the rights of surrounding property owners. They should be able to enjoy their property and feel with some confidence emergency services, if needed, can access their property in a timely manner. Property owners should have their voices heard in a public process when commercial ventures are being proposed that will have direct impact on their properties and their lifestyle. A public process also allows those proposing a horse boarding facility to present their plan to demonstrate if approved how they would mitigate negative impacts on their neighbors. I encourage adoption of the proposed Equestrian Standards and Regulations.	Silverdale	Washington
9/23/2025 11:09 AM	259	Kevin	Thompson	Kevin Thompson Senior Chief, United States Navy Co-Owner, Gamble Creek Stables Pony Club Riding Center 4493 NE Stevens Uhler Rd Poulsbo, WA 98370 Phone: (503) 898-8535 September 23, 2025 Kitsap County Planning Commission 614 Division Street, MS-36 Port Orchard, WA 98366 Subject: Opposition to Horse Facilities Draft Code Dear Commissioners, My name is Kevin Thompson, and I am one of the owners of Gamble Creek Stables Pony Club Riding Center. Our facility is home to 27 horses and serves 46 students who ride one to two times per week. Our riders range in age from 4 to 70, with the majority being school-age children from Bainbridge Island, North Kitsap, and Central Kitsap schools. I am a Senior Chief in the United States Navy, with 16 years of service and counting. Since 2017, I have supported my wife’s business while serving active duty. I have shaped my career around supporting and growing this program that is so meaningful to families throughout Kitsap County. I have recently accepted orders back to Washington State—my third time in a row—so that I can continue helping my wife pursue her vision of shaping young riders into responsible, disciplined, and hardworking members of our community. The two agricultural properties that are home to Gamble Creek Stables are both our livelihood and our retirement plan, as well as the place where we have raised our three children. The idea of losing a lifetime of hard work and potentially facing bankruptcy is incredibly unsettling. At Gamble Creek, we specialize in sport psychology, Pony Club education, and three-day eventing. Many of our students earn scholarships and go on to ride for intercollegiate equestrian teams—proof of the strong foundation they build here. Beyond competition, our programs instill life lessons in courage, discipline, empathy, responsibility, and resilience. Programs like ours are especially important to veterans and their families as well as children and adults with special needs. Research has shown that equine-assisted activities can significantly reduce symptoms of PTSD, depression, and anxiety. Studies from the Department of Veterans Affairs and peer-reviewed journals have documented how structured horse programs improve emotional regulation, decrease hypervigilance, and reduce feelings of isolation. Children of military families also benefit by finding stability, connection, and confidence through horsemanship—helping them navigate the stress of frequent relocations and deployments. This has a broader impact on community and small business. For example the new draft code language would close our doors, displacing 27 horses and more than 40 young riders. This loss would dismantle our barn community and severely impact the broader small-business network that supports us—veterinarians, farriers, feed stores, and local suppliers. To my knowledge, the proposed rules would effectively shut down every lesson barn in Kitsap County. This is especially troubling given that Kitsap County has one of the highest horse-to-person ratios in the United States. Horses are not only woven into our community fabric today but are also deeply tied to our local heritage. Our farm has been in operation since the 1890s, supporting generations of agricultural and equestrian activity. Legal and policy context supporting continued equestrian use. Washington law and county policy recognize equine operations as legitimate, protected components of the state’s agricultural and rural fabric: •Right-to-Farm policy. Washington’s Right-to-Farm Act states that agricultural activities on farmland are to be protected from nuisance actions that would prematurely remove land from agricultural use—reflecting a statewide policy to keep agricultural operations viable as communities urbanize. While nuisance law is distinct from zoning, this statute expresses clear legislative intent to avoid squeezing out working farms. •Growth Management Act (GMA) goals. Under the GMA, counties are directed to conserve agricultural lands and retain rural character. Kitsap’s current planning materials reiterate these goals—“retain the rural character” and “protect and conserve...working lands.” Regulations that functionally eliminate equestrian facilities would conflict with these objectives. •Equine Activity statute. Washington’s Equine Activity Liability law explicitly lists “equine training and/or teaching activities” and “boarding equines” as protected equine activities. That recognition underscores the Legislature’s view that teaching, training, and boarding are normal, expected parts of Washington’s equine industry—not fringe commercial uses. •Local code definitions. Kitsap County’s own code defines “equestrian facility” to include boarding, breeding, and training—again reflecting that these are established rural/agricultural uses the code contemplates accommodating. •Regional consistency. Nearby jurisdictions (e.g., King County) regulate equestrian facilities with standards that allow barns to operate while addressing impacts. Excessively stricter standards in Kitsap could be out of step with regional practice and needlessly burdensome to small facilities. Closing. I respectfully urge the Planning Commission to reconsider this proposal. Regulation can and should ensure safety and accountability, but it should not eliminate programs that serve children, families, veterans, and our rural economy. Closing equestrian lesson facilities would create social, educational, and economic harm that far outweighs any intended benefit, and it would conflict with state policy to conserve agriculture and retain rural character. Thank you for your time and thoughtful consideration of this critical issue. Sincerely, Kevin Thompson Senior Chief, United States Navy Co-Owner, Gamble Creek Stables Pony Club Riding Center	Poulsbo	Washington

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9/23/2025 11:37 AM	260	Shayla	Paddock	To whom it may concern, My name is Shayla Paddock. I am a current member of Gamble Creek Stables Pony Club riding center, and a lifelong horse owner in Kitsap County. While other members of the community I'm sure are going to write to talk about loss of income, and the codes and laws in a more logistical sense, I would like to tell you in a different sense, what these code changes mean to me and those around me. While I have one of my horses boarded, I also have horses at home, and was raised with horses and other livestock around me. My father moved to Kitsap from Jefferson County, where he was raised with horses and rode, and my mother moved from New York, where they bought the property I live on, and had horses. She took riding lessons at a barn, just as I do now. The reason I speak about this is that riding facilities have been here going back decades. The codes and setbacks that you are discussing as of current, would shutter the doors of effectively all small boarding and training facilities in Kitsap. While my own horse may have a property to come back to, I know that the other 26 horses at Gamble Creek may not, that makes me the lucky one. Except that I am not. Even if my horse has a home to come back to, I will lose my barn, the community it fosters, and all the learning I have done and will do going forwards. I started taking lessons when the schools took away my extra aide in speech therapy. I had tried other forms of therapy per say; swim, dance, music, but none of them helped me in the way that horses did. Not only did they make me feel accepted, but as has been shown by numerous studies and research, horses can be and for me, are a therapy that can help with mental, emotional, and physical issues. Going into my middle and high school years, they also helped with my diagnosed anxiety, and the depression I have had bouts with. Horses have given me things to work towards, goals to set and reach, and a purpose in life, besides the everyday work to pay bills. Not only this, but horses, and the barns I have been a part of have led me to being a better person. I have learned incredible amounts of knowledge. I have learned to be confident and work in team settings. I have learned emotional control, even in the face of things I cannot control going on around me. I have learned to speak publicly, and how to teach others the information I have learned. Every girl and boy I have met at every barn I have been at through the years has learned these skills. This is what these small boarding and training facilities bring to the table, and what will be lost if these measures are enacted as described. Sure, I will be lucky enough to still have my horses, but the majority of people in the area will lose any and all access. And I will lose what is actually my therapy, the lessons and learning that comes from a barn like mine. Please consider those who will be hurt by this, Shayla Paddock	Poulsbo	Washington
9/23/2025 11:56 AM	261	Tamara	Kulp	Please abandon ALL proposed zoning changes related to equestrian facilities in Kitsap County. The proposal is absurd and has significant negative impact on a highly beneficial element of rural Kitsap County, and unfairly restricts the rights of property owners which in turn will devalue the properties that owners have devoted years/decades of improvements to.	Southworth	Washington
9/23/2025 12:16 PM	262	Emily	Wilmot	The suggested modifications to the equine code should be REJECTED.	POULSBO	Washington
9/23/2025 12:32 PM	263	BOB & CINDY	ALLPRESS	REGARDING EQUESTRIAN REGULATIONS: 1. Seat the Ag Advisory Council NOW ! which has been in the comp plan since 2008 and which was recommended 2 years ago. 2. Defer any AG CODE updates until the Ag Advisory Council is seated. 3. These codes first and foremost should provide guidance on # of animals per acre so as to protect the welfare of the animal, specifically horses. Ive seen too many people that think Just because they have a couple acres they can keep 10 horses,,,, find a workable solution for this. This county seems to me to be confused about priorities. Rather than inventing regulations for folks just trying to enjoy their farm property, how about devoting more time to figuring out how to address the lack of infrastructure in this county? Its ironic that DCD is approving 100's of new developments to bring in thousands more people, but at the same time the county wants to cut the budget of our Sheriffs office? I listened to their presentation and frankly as a tax payer, its very unnerving to hear that our law enforcement is already in dire straits but is being asked to cut additional staffing ?!?! WHY would anyone want to buy a home in Kitsap county when safety is evidently not a priority here ?	Poulsbo	Washington
9/23/2025 12:38 PM	264	Karlie	Gaskins	My daughter rides at an equestrian facility. This is teaching her responsibility, animal care, teamwork, yardwork, farm work. She is learning so much and growing so much. The changes you propose will stop all of this from happening as you redefine what people can use their own land for. Most barns we have ever worked with are very considerate of neighbors and work with them. There will always be jerk neighbors who moved next to a barn and then are mad they did. These are the minority. Do not ruin the good the equine facilities provide to the entire community of all ages and types. I'm saddened this is even being discussed.	Port Orchard	Washington
				To whom it may concern: In the military we start with BLUF – the Bottom Line Up Front. So, what's is your BLUF here? Is it to restrict horses to such an extent that they are phased out? Horses and other livestock as well as small farm practices are a primary reason for purchasing acreage. By eliminating horses, is your plan to diminish the property value so it can be turned into developments? Imminent domain wouldn't work with so many widespread properties, so is this how it is to be accomplished? Forgive me, however the codes proposed are so incredibly restrictive but also put forth with little to no understanding of equine activities and management. It would appear these code proposals were developed by a city transplant who resents their equine neighbor. Kitsap historically has had the most horses per capita than any other county. It historically has been rural. Should these codes as presented be put into commission, then all other rural farm activities will also be threatened. It has taken us 40 years to finally have things “just right”. The restrictions being proposed would disallow any future horse lovers from accomplishing their horse goals. I wish to specifically address individual portions of the code proposal and state a response. Stabling, riding and pasture accommodations for use solely by a property owner's own horses shall be considered an accessory use. Actually, it is a primary reason people choose to live rurally because they desire to live a lifestyle that accommodates a horse. The horse is in no way an accessory of after-the-fact addition. Everything about owning or boarding constitutes a lifestyle. This would negatively impact the horse rescues and/or lesson programs. Their horses are privately owned by their organization and under the proposed code, would no longer be classified as a facility. They very much ARE a facility and should be privy to all that entails as they offer everything from hands on caregiving to use for riding for educational or therapy programs. Public events such as shows, clinics, or competitions are not included in a facility's routine equestrian activities and require separate review and permitting. Requiring a permit would inhibit programming flexibility as well as add cost and valuable time spent procuring said review and permitting. What would this CUP (Conditional Use Permit) require? Is this an annual application? Are there fees involved? Do my neighbors need to get something similar when their band practices or for the neighborhood HOA meetings? Barns and stables shall be located at least fifty (50) feet from any property line. Paddocks and manure storage or disposal areas shall be located at least two hundred (200) feet from any property line. Re: Paddocks – what is the definition being used? Merriam-Webster states: Paddock noun: a usually enclosed area used especially for pasturing or exercising animals Common usage locally includes pasture (for turn out weather permitting), run-out (attached to a stall for exercise, and reducing the concentration of mud, manure & urine), stall (a covered shelter usually 12x12 enclosed), paddock (may be a small turn out area or dry-lot with no grass) and arena (may be covered or not for purposes of exercising particularly while riding). If you are all inclusive of any area in which to “keep” a horse, then to meet the criteria one would need greater than 5 acres. An actual layout is majorly unattainable in Kitsap County. Rare is the square platted property, flat in nature with unhindered building potential. We are bounded by fjords, wetlands, salmon streams, lakes, woods and hilly terrain.		

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9/23/2025 12:44 PM	265	Mickey	Centeno	It is unrealistic to combine pasture AND arena into one small space in property center. These are not dogs which can be crated. If your hidden agenda is to rid the county of horses, why not just state no horses will be allowed to set foot in the county? To include manure storage in those setbacks demonstrates a lack of knowledge regarding "manure" and functionality. We feed our beloved equines quality grass. What comes out the other end is chewed grass very similar in nature to what you scrape off the underside of your lawnmower deck. Equine are not carnivores which produce much different feces which does not lend itself to composting. It is not picked up with a doggie bag but rather with a manure fork in a wheelbarrow. Bins must be easily accessed to be filled by same, and also easily accessed to empty by tractor. Many of us have collaborated with the Conservation District and installed bins which compliant with construction code. Manure is managed as compost with frequent turning, and cover from rainfall so as not to contaminate water sources and to retain nutrients for fertilization purposes. This by-product is in such demand that people actually pay for it! Applicants shall demonstrate that odor, dust, noise (including amplified sound) and drainage shall not constitute a nuisance, hazard, or health problem to adjoining property or uses. Best Management Practices for runoff and dust control shall be implemented. Best management is for horses to have space to amble around which not only spreads the manure and urine by not concentrating it in one confined area, but also aids in their digestive capabilities just as humans benefit from physical activity. Excrement dries quickly when exposed to air, and greatly decreases fly activity, mud and soil compaction which impedes drainage. A limit on the number of horses kept at the facility based on acreage and site conditions (e.g., one horse per one-half acre); What is the intent of this restriction? Boarding facilities often contain horses in stalls with or without runs – and offer daily turnout so more animals can utilize the same space. The majority of horses are fed hay year-round as our summer weather and soil composition of rocks and clay is not conducive to depending on pasture forage only. Hours of operation limited to 7:00 a.m. to 8:00 p.m., unless otherwise conditioned; As equine facilities are rural, and generally on acreage, who is complaining or noticing hours of operation? Does this include feeding, fixing a fence, loading into a trailer for an event, or having the vet out in the wee hours? A requirement for visual screening of parking areas, manure storage or disposal areas, and storage area for mechanical and transportation equipment (e.g., tractors, trailers, storage pods) from adjoining properties; Are you trying to make unincorporated Kitsap into a private HOA? Since when is a tractor or storage offensive when you can drive anywhere in the county and see homeless camps with all their trash, or half naked people on drugs stumbling around? Are you trying to pretend farmers don't exist? Will you start requiring residents to actually park in their garage so you don't see their method of transportation? This targets a particular segment of the population and is prejudicial. Vehicular ingress and egress shall be provided according to County road standards and subject to approval of the County fire marshal. (Consider whether access must be directly from a public road.) Why is this a concern? Horse facilities for self-preservation and functionality configure their driveway to include a turn around for their trailers. Why does there need to be even more oversite? Many instances of extra cars parked around a home for a multitude of reasons – a wedding or party or BBQ or garage sale. If it became a regular occurrence then that might warrant a case-by-case investigation. Strong consideration must be given to the impact of restricting horse activities as it will have a definite economic impact. There are multiple feed stores and feed providers, farriers, veterinarians, equine masseuse and chiropractors, suppliers of camping supplies, mechanics, trailer sales and repairs – the list goes on of those who garner the business of equestrians. So, BLUF: what is the hidden agenda for the county to propose this extremely restrictive codes?	Seabeck	Washington
9/23/2025 12:49 PM	266	Cynthia	Chase	I currently live on 2-1/2 acres with a 110 year old house and an indoor arena. I have 3-1/2 personal horses and have owned horses for over 50 years. While I don't board other people's horses, I am close to retirement and may some time in the near future have to take on a boarder to help with expenses of living in Kitsap County. What if I have to sell my property and the new owners can't rely on boarders to pay the exorbitant property taxes and utility charges? That will drastically limit potential buyers for my property. Please consider these new code changes, as they will impact my entire property if any change ever has to be made to the structures. With the new changes, my long and narrow property would not comply with the setback requirements. What happens then? My indoor arena gets torn down? My covered, conservation district designed manure area gets demolished? It'll destroy my and my way of life.	Poulsbo	Washington
9/23/2025 1:10 PM	267	Gloria	Keifert	Please stop I have lived on this acreage for 53 that has to stand for something! Don't change our lives because the neighbors sold and built rezoned	Poulsbo	Washington
9/23/2025 1:10 PM	268	Robin	Salthouse	There is great concern granting a rezone to this property due to past and ongoing noncompliance with Kitsap County codes, permitting and critical areas. APP-ID: 57 Moran The owners of this 5.21 acre rural residential property are Moran Humberto and Larios Adriana Tovar. The owners seek a rezone from Rural Residential to Rural Industrial. As noted by the staff, the site contains a general purpose building, an unpaved driveway and a parking area. The remainder of the property is forested. Access is from SR-3. A wetland delineation report provided by the applicant notes that a Category III wetland is on the west side of the property. A linear area of high erosion hazard extends through the middle of the property. The property is significantly encumbered by critical areas and buffers. The owners also own a 4 acre parcel to the north, zoned rural residential and developed with a single family residence and a detached garage built in 1964. The staff reports significant non-compliance for the owners' four acre property immediately adjacent to the subject property. "An active code enforcement matter (Case#CC 220108) exists for the property. An inspection on 3/17/2022 noted "crew moving dirt, grading are for new building with no permits, new structures built without permits, old garage converted into and used as office for commercial business in residential area, running contractor storage area without permits with standing water/wetlands on west side of parcel, no BMPs in place, truck traffic tracking mud, work continued after stop work was posted." Hearing Officers routinely deny permits for violations of County Ordinances and State Law. Here the owners are seeking huge financial gain by a rezone from Rural Residential to Rural Industrial. The Commissioners must deny this reclassification request. The staff report is incomplete. The proposed changes will give a huge economic benefit to the applicant while violating the Growth Management Act. An active code enforcement matter (Case#CC 220108) exists for the owners' adjacent property. An inspection on 3/17/2022 noted "crew moving dirt, grading are for new building with no permits, new structures built without permits, old garage converted into and used as office for commercial business in residential area, running contractor storage area without permits with standing water/wetlands on west side of parcel, no BMPs in place, truck traffic tracking mud, work continued after stop work was posted." The proposed changes will provide a huge economic benefit to the applicant while violating the Growth Management Act, the Clean Water Act, RCWs and Kitsap County ordinances.	Kingston	Washington
9/23/2025 1:11 PM	269	Cathy	Ford	Further limiting of equestrian endeavors is not necessary.	Silverdale	Washington
9/23/2025 1:11 PM	270	Victoria	Hoisington	Hi Im a horse enthusiast I ride and board my horse. The new codes and restrictions on land owners and the fines that may happen with changes to a facility are ridiculous. For one thing most people that have horses know that a 200 ft buffer on a 5 acre lit is unfeasable for horses. I was in 4-h loved hoses and rural life. We moved to kitsap when my hisband became a pediatrician. Hes with the Doctors clinic. Many children in his practice live on farms and are active in fair , 4-h and raising animal. I TRULY AM OPPOSED TO THESE CHANGES. .	Bremerton	Washington

Year of Rural Comment Form
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Date Submitted	Id	Name First	Name Last	Comments	City	State
9/23/2025 1:23 PM	271	Emmerson	Gillanders	Good afternoon or morning, whenever it is when you are all reading this. Hi, my name is Emmerson. I am 15 and I ride and compete horses as an eventer within Washington state and kitsap county. I am writing to ask you all to please reconsider and change the draft for the horse facility code update. This update would close most if not all equestrian facilities within kitsap county this would effectively tear every community apart. Not to mention having to either sell or find barns for horses outside of the county which for most is not doable. Horses have been a big part of my life and my family's life for generations. I am one of the lucky ones where I was born and raised alongside horses and the equestrian community. However even within this, I do not own my own horses meaning that this would destroy my life and many others. I ride and compete for Gamble Creek Stable on Poulsbo's outskirts. The barn is run by our lovely trainer who houses and cares for 27 horses currently most of which are boarders from Kingston, Bainbridge and the larger Kitsap County area. The barn is home to a community of 40 kids and adults alike who all enjoy riding together and going out on trail rides. We however are prominently made of kids similar to me who rely on horses for happiness and an escape, many of whom compete and don't own horses. This summer alone we had 5+ riders and horses within the eventing discipline qualify for the American Eventing Championships down in California. Not to mention the other 6+ who have qualified for our state championships and even regionals several of which took home 2nd place. This code would effectively destroy our barn and evict 27 horses, all of whom don't have room at their own houses for these horses who have built our lives up and gotten us to the national level in a very short period of time and who have potential to go to the international level within eventing. This code would deeply affect me as I am someone who actively struggles with anxiety and this sport gives me a place to relax and have a connection where I can actively participate in myself. I know many others who have had experiences such as myself where horses and this sport give us an out and a place to just relax and have fun instead of worrying about whatever else is in our lives. This sport not only supports those who want to be competitive but also those who need a place other than home to be there home. This code would totally destroy that out that many have. This is especially important for those who can hide at these barns from whatever family or school issues may have happened. This could push many young teens over the edge. This is not only seen and felt over the past 5 years by myself but is also proven by scientists and therapists who are trained to help people in my similar situation. You could argue this by saying that you wouldn't have to apply this to specialized therapy centers; however, that would not solve the issues of who can't afford that kind of therapy. Within our county, this code change would affect at least 31 different equestrian barns, lesson programs, and horse rescues, not to mention, based on a census from 2022, there are close to 570 farms within our county in total, of which 97 are family-run, which could destroy our county. Within these, there are close to 1,182 horses and ponies in total. This would put most of these horses out of a home and close so many farms. Which would in itself destroy our county, as many would have to commute at least an hour away just to take lessons or board their own horses. This cost would destroy families and would mean many would have to close their doors permanently. Our county was built on horses and equine activities; many within this county would have to sell their horses, which would result in more mental health issues, especially within those who don't have the space or money to afford this lifestyle and make hour-long commutes to outside the community. I urge you all to consider very carefully how much you would destroy by enforcing this code change simply based on the census alone. There are 570 farms, a confirmed 31 that are equestrian facilities, and 1,182 equines within our county, many of which would be out of a home. This would destroy our county's community. This code change would mean many riders who could go both nationally and internationally at the top of the sport would no longer have the means to get there, many of whom are currently 14 or younger. This code will not only affect adults but also children and minors. This code would destroy our entire life, especially for those who use the barn as an escape from their own head, as you are often calmer and have less stress when you are around horses. This code would be detrimental to many in our county and would cause more harm than good to our equine and human populations, both of which our county depends on. I urge you all to reconsider this code greatly and make it so that you do not cause this entire county's lives to be uprooted, especially those of us who depend on this sport for our mental health. If you go through with this code change, it will most likely destroy our county and the communities within. Loveliest wishes for you to reconsider, Emmerson Gillanders	Kingston	Washington
9/23/2025 1:25 PM	272	Kristine	Cramer	Dear Commissioners, My name is Kristine Cramer, and my 16 year old daughter, Sage, boards her horse and takes lessons at Gamble Creek Stables in Poulsbo. Sage has been riding at Gamble Creek since 2021/22, and the barn means the world to her. It has given her a sense of community, focus, passion, and responsibility. She has learned how to care for every aspect of large animals. Her time at the barn has set her future path, as she is determined to become a large animal veterinarian. Sage has learned as much or more at the barn as she has at school – life lessons like courage, discipline, empathy, responsibility, kindness, and resilience. Updating the code would close Gamble Creek's doors, leading to a huge loss for entire barn community. As I understand it, the code would effectively shut down most or all of the lesson barns in Kitsap County leading to a true crisis. This crisis would have ripple effects – youth and adults scrambling to find care for their animals; economic losses for business owners, vets, feed stores, farriers and more; loss of community and purpose. Many of the students participate in competitions, gaining them valuable life skills and creating a cross-regional network of equestrian lovers. I write today to respectfully ask the Planning Commission to reconsider this devastating proposal. Please seek a middle ground that addresses the concerns raised in this new code update without eliminating the very programs that serve children, families and rural communities. Closing equestrian lesson facilities across the county would create social, educational and economic harm that will not be easily remedied. Thank you for your time and thoughtful consideration of this critical issue.	Bainbridge Island	Washington

Date Submitted	Id	Name First	Name Last	Comments	City	State
9/23/2025 1:26 PM	273	Martha	Blackburn	Please reconsider any changes that have to do with equine facilities. My granddaughter moved to Kitsap County in 2021, and started riding at a facility within a month of her arrival. She is currently 14 years old and thriving with her horse.. The valuable life lessons she has learned and continues to learn daily are a testament to her trainer and barn family. I would hate to see anything change that would threaten her boarding her horse, taking lessons, competing and continuing to thrive in the equine community.	Bainbridge Island	Washington
9/23/2025 1:32 PM	274	Liz	Martell	Liz Martell 9401 NE Tidal Court Bainbridge Island, WA 98110 Kitsap County Planning Commission 614 Division Street, MS-36 Port Orchard, WA 98366 Subject: Opposition to proposed rural code changes affecting equestrian facilities Dear Members of the Planning Commission and Board of County Commissioners, I am writing to voice my strong opposition to the proposed changes to Chapter 17.455 (Agriculture Code) of the Kitsap County Zoning Code, particularly the addition of Section 17.455.075 on equestrian facilities. While I understand the intent may not be to eliminate these facilities, the reality is that the regulations as written would make it nearly impossible for most equestrian centers in rural Kitsap County to continue operating. This would have a devastating effect on small-business owners and would take away a vital resource from the community. My family lives on Bainbridge Island, and my two daughters have spent countless hours riding and caring for horses at four different equestrian facilities in Kitsap County. These barns have given them far more than riding skills. Through daily chores, competitions, and the bond they've built with their horses, they've learned responsibility, resilience, patience, and confidence. The opportunities they've had—and that so many other youth and adults rely on—would be severely threatened by the overly restrictive rules being proposed. The requirements, such as the stringent setbacks for paddocks and manure storage and the cap on horse numbers, would impose unreasonable costs and logistical barriers. Most equestrian facilities in Kitsap are small, family-run operations without the resources or acreage to comply. Large-scale operations might absorb these requirements, but small operators cannot. The result would be widespread closures, with negative consequences for both the local economy and the community at large. I fully support fair, balanced regulations that protect neighbors and ensure facilities are responsibly managed. Standards for manure management, dust control, traffic safety, and hours of operation are reasonable and appropriate. But in my experience, most local equestrian operators already take these responsibilities seriously and work hard to be good neighbors. The new rules go far beyond what is necessary and would punish responsible operators along with the few who may cause problems. Instead of blanket restrictions that cripple nearly all facilities, the County should focus on narrowly tailored rules and consistent enforcement to address issues at specific problem sites. I urge the County to carefully study the real-world impacts of these proposed regulations and to engage directly with equestrian facility owners in shaping a fair and workable solution. It is critical that any policy changes protect the future of these facilities, which provide recreation, education, and economic value while strengthening the fabric of our community. Thank you for your time and thoughtful consideration of how deeply this proposal would affect so many families in Kitsap County. Sincerely, Liz Martell	Bainbridge Island	Washington
9/23/2025 1:37 PM	275	Claire	Plehal	I live on a small acreage where I have kept my own horse and have boarded other people's horses. My child currently takes lessons at a farm in Kingston. I know that some of the specific changes proposed for horse related businesses will have a big impact on people trying to run their farms, and I'd like you to reconsider. The number of horses per acre, the set back of 200' for paddocks and manure storage, as well as the hours (veterinarians are needed on an emergency basis at all hours), and the barn set backs of 50', all seem problematic for small farm owners. Why are these changes being proposed now? I'd respectfully ask you to seek feedback from a variety of current horse related businesses before moving forward with code changes.	Bainbridge Island	Washington
9/23/2025 1:51 PM	276	Joyce	Clay	I was privileged to grow up around horses, and I believe that it had a big impact on my life going into my 10 years and later as an adult, they taught me responsibility that taught me compassion, taught me how to care for animals and to love them and I see in today's world so much of that is missing in our young people. I am 82 years old now, and I would hate to see any thing that gets up county border commissioners or whoever is in charge of making the rules I would hate for you as a commission as a body of probably 8 to 12 people maybe Making that such an important change in anything that would be a detriment to the small business owners of farms, equestrian farms, ranches that are working so hard to provide opportunities for our youth and our adults and our people who have health issues even I would hate for all of that to end because of putting higher taxes on them so many times they're just making ends meet right now so I'm praying that you will make a decision to keep your rules and laws and tax codes where these small business owners of some of these farms and ranches would not be looked at as a big commercial enterprise because They're not thank you	Poulsbo	Washington
9/23/2025 1:59 PM	277	Tonya	Floria	Objection to Proposed Changes to Rural Code Regarding Equestrian Facilities Dear Members of the Planning Commission and Board of County Commissioners, Please file this as an objection to the proposed changes to Chapter 17.455 (Agriculture Code) of the Kitsap County Zoning Code, specifically the addition of Section 17.455.075 regarding equestrian facilities. I am a resident of Kitsap County and a mother of a ten year old equestrian. We moved here when my daughter was three specifically so that we could raise her in a rural community away from the hustle of life on the busy side of the sound. While in the middle of the devastation that went along with a childhood during a pandemic we found the happiest place on earth in the form of Gamble Creek Stables and Pony Club. The environment Tanya and the rest of the barn have created has been a lifeline to my daughter and countless young people I have seen there. This is a place where diligence, dedication, confidence and humility are grown and are the heart of this rural community. This is the education outside of school that will serve these young people for a lifetime. To take this away in the name of promoting development would be absolutely devastating both personally, to my daughter and to what this community is. Please reconsider passing these changes that would harm so many. If a few bad seeds need to be regulated, then that is something that can be addressed directly, not in these broad terms. Sincerely, Tonya Floria Indianola Resident and mother of three. Parent of Gamble Creek Stables and Pony Club Member	INDIANOLA	Washington
9/23/2025 2:05 PM	278	Michael	Murray	I do not understand why the county is involved in what appears to be a straight forward civil issue.The complainant stated that the activity of the defendant blocked emergency equipment access. I have driven that road and there are turnouts. Also, an attendee quoted a statute that if there were more than four houses on a private road it had to be 20' wide. According to comments at the Sept 11 hearing there are 14 houses on that road. Has any county representative driven that road or done any investigation? And again this seems to be solely a civil matter. I heard the moderator at the Sept 11 meeting state she had never seen so many people in the room and that the initiative was not well received. I think the county should withdraw this ill thought initiative at once.	Silverdale	Washington
9/23/2025 2:08 PM	279	Ruth	Murray	I am adamantly opposed not only to the equestrian proposed changes but also to the ridiculous timeline you made. No one knew about these proposed changes until September 3,2025. Your method of notification was a unacceptable. Over 200 people came out to oppose it because they found out through facebook. Your proposals violate state law in regards to agricultural lands and our rural farms in kitsap county. You need to cease these proceedings and take a year to actually talk to the committee formed who have actual equestrian property owners on it. You need to drop the timeline and push this out a minimum of a year before bringing anything back to the public. At the hearing you showed your complete ignorance on the matter with no real studies and the entire reg changes based on one person's complaint which should have been a civil matter and who also lied openly when they were given the microphone to speak. Also I dont appreciate the form you have given us to comment as we cannot even see more than a partial sentence of what we actually writing, This block for comments should have been an entire area for writing a paragraph. I find your demands on the equestrian properties totally unacceptable.	Silverdale	Washington

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Date Submitted	Id	Name First	Name Last	Comments	City	State
9/23/2025 2:10 PM	280	Beth	Berglund	What is driving the Horse / Equestrian Facilities specific code? I question the need for a section separate from the already existing Livestock standards. If there are concerns about events / agri-tourism, environmental issues / runoff, etc. it seems those should be generally applicable to livestock (e.g., goats, sheep, pigs, etc.). If the issue is about Boarding Facilities, then perhaps that issue is better addressed either as a new topic under the Livestock standard or addressed along with other animal / pet boarding facilities.	Kingston	Washington
9/23/2025 2:24 PM	281	Clifton	Peterson	Public Statement – Kitsap County Draft Code Hearing Sept 23, 2025 Clif Peterson ⁴ JOY Equine Good evening Commissioners, members of the Planning staff, good citizens of Kitsap County and a special shout out to the JOY Equine Youth joining us tonight! Thank you for your service and the work you do to make this county a great place to live. At the outset, let me be clear: any decision made tonight or in the months ahead must be filtered through the protections of both the Washington State Constitution and the United States Constitution. The inalienable rights of the citizens of Kitsap County must come first. Power resides with the people. Regardless of state mandates or local code revisions, we are demanding that our county officials stand to defend our constitutional property rights. Both constitutions clearly enshrine this protection, the Fifth and Fourteenth Amendments of the U.S. Constitution, and Article I, Section 16 of the Washington State Constitution. When regulation imposes unsustainable financial burdens that strip citizens of the ability to use their land productively, that constitutes a “taking” under constitutional law, even if disguised as zoning or code updates. Washington’s Right to Farm Act further strengthens this principle by protecting agricultural activities from nuisance-style regulation. These rights are sacred and God-given. They cannot be taken away or diminished by code, regulation, or ideology. The staff presentation confirmed that these proposed updates are tied to the Growth Management Act of 1990 and its subsequent mandates. Yet, what brings them here today is not broad public demand, it is clearly driven by progressive urban planning geocentric ideology and brought to the surface by as little as ONE citizen complaint, now threatening to reshape the rights of every equestrian and agricultural property owner. The County shall not assume an arbitrators role to settle neighbor feuds at the expense of all citizens. We are not here to ask for permission, nor to plead our case. We are here to defend what is already ours, guaranteed by the Constitution. More laws, more codes, and more regulation are never the solution. The true solution is deregulation, elimination of conflicting rules, and the defense of fundamental rights for a moral, ethical, and responsible citizenry. In closing, I reiterate my demand: the public servants of Kitsap County must use all means necessary to defend and protect the constitutional, God-given, inalienable right to property. I have submitted additional case law, nearly 1,000 petition signatures, and our heartfelt JOY Equine youth mentorship testimony for the record. Thank you for your time and service.	Port Orchard	Washington
9/23/2025 2:30 PM	282	Alliso	Fuoco-Bennett	I think any reclassification or code updating that negatively affects horse barns of any size or nature should not be considered. Thses barns, some old and new create a place for so many people of all ages, races and backgrounds to come together and enjoy the simple things in life, expirience growth and create hard working americans that were are losing at alarming rate. There is no other place like a farm that creates such strong hard working youth that were raised with responsibilities and true life lessons. You dont get that growing up in an urban apartment complex or a townhome or one of those cookiecutter developments. (With those you actually see the exact opposite, kids glued to screens all day, not learning how to be good citizens or do anything positive for the community)Farm and ranch life is something we should all hold dear to our hearts and treat as something sacred and worth holding on to as long as we can. For every family that forced to sell their grandparents ranch to a developer, is adding momentum to this whole idea, and I feel that they are slowly chipping away at our chances of preserving this life style. And by implementing these new codes I feel that we are one step closer to closing the chapter of this oh so important way of life.. Some of the greatest barns that host so many wonderful youth groups will suffer the most with all these code restrictions, these will be forced out. And why not keep those youth and businesses here in kitsap county? Why push that out? Why is it that this specific group of people are being targeting and pushed out? The Americans that work hard and keep our county worth sticking around for, deserve the ability to keep doing all the great things they do and not have to fight for such a simple pure way of life. It seems crazy to have to even say that! Leave the farms alone, this is how life was intended to be!! FARMS EQUAL FOOD! Not china or some lab. And sure as heck not an apartment building or shopping mall. How about we rezone the disgusting city and bring in more farms! And see how great of impact that would be for out environment!	Vaughn	Washington
9/23/2025 2:30 PM	283	Wendy	Bond	Equestrian property rules should not be changed to push out small business owners and change the rural character of our county. These businesses contribute to the quality of life for our citizens. Being able to make a living on small scale acreage is crucial to the local food economy as well as agritourism. Landowners that can't use their rural properties for agriculture of all kinds will be forced out and Kitsap County will lose very important landscapes to development. The charm of barns, pastures, and livestock enhances the character of our communities. Erasing that by reducing and restricting land use by historic small farms sets a bad precedent that ignores heritage that settled our county.	Poulsbo	
9/23/2025 2:35 PM	284	Beth	Berglund	If it doesn't already exist, the Kitsap County Code and Comprehensive Plan should ensure that LAMIRDS, especially at the perimeters / public edges, be consistent with the local rural character. At a minimum restrictions should include (1) setbacks and a requirement to plant and maintain trees and other vegetation as a visual barrier, (2) ensuring structures & signage are appropriate for a rural context. Recently projects such as the new heated storage facility on SR 104 in the Streibel's Corner Employment Center were designed to function effectively as a permanent massive marketing wallscape / billboard for the business which is not at all appropriate and shouldn't be allowed if we are interested in preserving rural character. Similarly, the new sign at the Bond / Gunderson Employment Center is a great example of what isn't appropriate along that rural corridor if we're interested in preserving rural character outside of the Urban Growth Areas.	Kingston	Washington

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Date Submitted	Id	Name First	Name Last	Comments	City	State
9/23/2025 2:37 PM	285	Clifton	Peterson	George Orwell's 1984 is essentially a manual on what happens when government overreach tramples individual rights. If you want to use it in your defense of property rights, here are some sharp, relevant lessons you could draw on: 1. Control Through Regulation In 1984, the Party controls every aspect of life through endless rules, restrictions, and "revisions of the record." Lesson for your case: Excessive regulation of equestrian facilities (permits, setbacks, CUPs) is a modern echo of that—slowly eroding freedom not by outright seizure, but by paperwork, codes, and bureaucratic control. Talking Point: "When regulation becomes so burdensome that it prevents lawful and responsible use of property, it is no different than outright confiscation. Orwell warned us that control doesn't always come with chains—it often comes with rules." 2. The Redefinition of Words In 1984, "Newspeak" was designed to limit what people could think by redefining language. Lesson for your case: Terms like "public safety," "environmental stewardship," or "community planning" can be weaponized euphemisms when used to justify stripping long-standing rural practices. Talking Point: "If the County can redefine normal farm activities as 'industrial uses' requiring expensive permits, we've entered an Orwellian space where truth is inverted, and freedom becomes permission." 3. Power Over the Individual Orwell's Party insisted that power meant the ability to dictate reality—"2 + 2 = 5." Lesson for your case: When the County claims that one neighbor complaint justifies rewriting decades of property rights for everyone, it's the same principle: authority imposing reality, regardless of common sense or fairness. Talking Point: "Property rights mean nothing if the County can declare that our barns or riding arenas are suddenly illegal without permits. That's 2 + 2 = 5 governance." 4. Erosion of Privacy In 1984, the government's intrusion was constant—there was no such thing as private space. Lesson for your case: Unchecked inspection authority and retroactive code enforcement effectively remove privacy and autonomy from landowners. Talking Point: "Our homes, barns, and fields are not public parks—they are private property. The Founders guaranteed us that line. Orwell warned what happens when the government forgets it." 5. Resistance and Truth Winston's rebellion wasn't just about politics—it was about remembering truth and defending human dignity. Lesson for your case: Standing up for property rights isn't obstructionist—it's affirming truth: that citizens are stewards of their land, not tenants of the state. Talking Point: "The struggle in 1984 was to preserve truth and humanity in the face of crushing control. Tonight, our struggle is to preserve property rights—the foundation of liberty itself."	Port Orchard	Washington
9/23/2025 3:32 PM	286	Jill	Cornforth	Hello. I am a lifelong Alaskan, living in Poulsbo with my horse for over a year. I currently board at a Poulsbo equestrian facility, and am actively looking for horse property to purchase in this area. My concerns with the proposed code changes are twofold; they could impact the ongoing availability of existing boarding barns, and they could impact my plans to have a small facility with a few horses at home, including some boarding and lessons. For example, the definition of "paddock" is not clear, but if all horse fencing is to be 200' from property lines, I can't afford enough acreage to make that practical for good horsekeeping. The collective equestrians in this area contribute a significant amount to the local economy. My current one horse alone contributes to Sound Equine Veterinary, another vet/chiropractor, an equine bodyworker, a farrier, Cenex/CHS, Tractor Supply, Poulsbo Grain & Feed, Fish Hay Farm, and Absolute Horse. Please reconsider the possibly unintended consequences of these proposed changes, and listen to the many equine business areas in Kitsap County. Thank you for your time. PS: This form would be more user-friendly if one could review comments without scrolling backward word by word.)	Anchorage	Alaska
9/23/2025 3:33 PM	287	Tara	Ackermann	The update to section 17.445.070 of the county code will drive small farmers out of business and prevent Kitsap county citizens from keeping backyard chickens. The requirement to have an approved farm plan to keep any livestock on the property is not realistic and the conservation district is not able to provide services to the thousands of livestock owners and small farmers within Kitsap county. This will immediately force many local producers out of the market. Small farmers and backyard chicken keepers are an important piece of our local economy, keeping money circulating through our community instead of sending it to billionaires via Fred Meyer or Albertsons. Local small farmers are also a huge source of good, affordable food for the community and removing local farmers will negatively impact reliable sources of healthy food. Maintaining a local food supply from small farmers is also integral for disaster preparedness and resiliency. Please do the right thing for our community and support local farmers and backyard chicken keepers. Do not implement these onerous requirements for keeping livestock in Kitsap County.	Port Orchard	Washington
9/23/2025 3:55 PM	288	Brittany	Maziarz	The following pertains to the proposed reclassification and permitting requirements for horse boarding facilities in unincorporated kitsap. I would like to note I do not own horses but have in the past and have never boarded. Downstream impacts: Right now in north kitsap we are down to one horse vet practice - sound equine. There have been many vets who have shuttered since covid, for numerous reasons but the main one is that they sell out to conglomerates to provide their staff with benefits. Initially a noble cause. However these conglomerates either pivot entirely away from horses and live stock or just shut down. Clover Valley is one example of this and Apple Tree cove is another. Clover shuttered. Apple tree pivoted and lost their vets by doing so. Cats and dogs bring in the \$\$, not horses, sheep and other live stock. The primary \$\$ maker for the vets that do treat our hooved friends is stables, they make their primary income going to these boarding facilities and treating numerous animals at once. This also extends to ferriers (those that treat horses feet). Not only are we facing a brain drain on no new talent or interest from our younger generations there is 0 money in it aside from stables. When these facilities close because of the henious regulations proposed it will harm everyone in the county. Regardless if they live on Bainbridge or unincorporated Kingston. Permitting fiascos: I recently just had a home put in, there were comments made during one of the public speeches I would like to address here - paraphrased it came down to "it will not be retroactive" My home replaced an existing one I had tore down, its on a shared well and but separate septic. The other individual sharing the well had to update their own septic to code before the DOH would approve - it was not just MY septic. This leads me to not believe this for mentioned statement at all, this was literally last year. You absolutely will go retroactive, there is 0 guarantee you can give because the county doesn't talk to the DOH and the DOH doesnt talk to the county. The DOH also requires a well test which I happily supplied and passed. Yet two months from moving in I became incredibly ill. The DOH doesnt require testing for arsenic, heavy metals or magnesium bacteria. Upon a secondary private well test we found the well to be 3x higher than the CDC recommended levels in Arsenic. Does the DOH care about the health of the people of the county or just \$\$? Situations like the one I just listed erodes the trust any of us have in the county when it comes to regulations. If we cannot even be safe putting in a house from these malicious permitting tactics how on earth can we trust more robust permitting for facilities interacting with the public.	Kingston	Washington
9/23/2025 3:58 PM	289	Bradley	Wilmot	Protect private property rights. The county can give me a property tax deduction if they wish to create setbacks affecting how I use my property (as the changes in the equine code would do)	Suquamish	Washington
9/23/2025 4:07 PM	290	Cynthia	Muirhead	Horse facilities draft code. This code places undue restrictions on new horse facilities that will cause it to be unprofitable to create a new facility. The set back of 200 feet for Paddocks would cause a parcel of 9 acres - 3x3 with adjoining properties on three side to have almost 7 of those areas unavailable for paddock use. What horses need to be healthy is open grazing paddocks and this would make it impossible to have such a facility. The visual screening of parking, equipment, and manure is undefined. How far away can these be placed from the property line? If they are X feet away - do they still need to be screened? To whose satisfaction is the screening implemented? To place these burdens will mean no new facilities, which will end this area being an equestrian area. Boarding is already scarce, basically no new horse owners can move to the area, killing a source of jobs, vets, farriers, feed stores, stable personnel, trainers, and Im sure many more jobs will be lost if the horse industry in our area is limited. No equestrian growth with along with population growth will eventually kill the industry in this area.	Poulsbo	Washington

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Date Submitted	Id	Name First	Name Last	Comments	City	State
9/23/2025 4:31 PM	291	Steve	Martell	Subject: Objection to Proposed Changes to Rural Code Regarding Equestrian Facilities Dear Members of the Planning Commission and Board of County Commissioners, I am writing to respectfully object to the proposed changes to Chapter 17.455 (Agriculture Code) of the Kitsap County Zoning Code, specifically the addition of Section 17.455.075 regarding equestrian facilities. Although it may not be the intent, I believe that the practical effect of this code section as currently proposed will be to shut down nearly all equestrian facilities in rural Kitsap County. This would have a disproportionate impact on small-business owners and would be highly detrimental to the community. Equestrian facilities are not only small businesses, they are community assets that provide meaningful opportunities for youth and adults alike. Horseback riding builds responsibility, discipline, and confidence, while also fostering a strong connection to nature and animals. In my own family, two of my daughters are actively involved in USA Pony Club and USEA Eventing, and I have seen firsthand how deeply these opportunities shape their growth. Through countless hours at the barn and at competitions, my daughters have learned far more than how to ride. They have gained responsibility, patience, and compassion through the daily care of their horses. They've learned that hard work and consistency matter, whether it's mucking stalls, conditioning rides in the rain, or late nights polishing tack before a rally or event. Competing in Pony Club and USEA Eventing has taught them teamwork, resilience, sportsmanship, and grace under pressure. Most importantly, the bond they've developed with their horses has given them confidence and a sense of belonging that has become a defining part of their lives. The overly restrictive regulations being proposed would threaten to take these opportunities away—not just from my daughters, but from many other families in Kitsap County who rely on accessible, well-run equestrian facilities. The proposed requirements, particularly the restrictive distance setbacks, manure storage rules, and limits on the number of horses, would impose overwhelming financial and logistical burdens on local operators. Unlike large corporate facilities, most equestrian centers in Kitsap County are small, family-run operations without the land or resources to absorb these changes. If enacted as written, these rules would force many barns to shut down, devastating a vibrant community of youth riders, families, and small businesses. I fully support the need for reasonable regulations that balance equestrian operations with the interests of neighbors. Rules around safe access, responsible manure management, dust control, and appropriate operating hours are fair and already widely practiced. But these proposed changes go far beyond what is necessary, applying one-size-fits-all restrictions that punish the many for the shortcomings of a few. Narrowly tailored regulations and consistent enforcement of existing rules would be a far more effective and fair approach. I urge the County to carefully consider the unintended consequences of these proposed changes and to work collaboratively with local equestrian facility owners, trainers, and families to develop balanced solutions. Equestrian activities are a vital part of our county's heritage and provide immense educational, recreational, and economic value. Please do not undermine the viability of these facilities and the opportunities they provide to the next generation. Thank you for your time and thoughtful consideration. Sincerely, Steve Martell	Bainbridge	Washington
9/23/2025 4:36 PM	292	Stacy	Taylor	To my understanding, the proposed legislative changes arose from a complaint by a single individual concerning roadway access. The roadway is adjacent an equestrian property but the dispute itself didn't concern the animals. People being people, it is perhaps not surprising that a dispute having a tangential relationship at best to equestrian land use regulations was escalated to a county-wide effort to undermine the ability of such properties to exist and function. But it is extremely disappointing to see the County entertain such vindictiveness and propose legislation in response that ignores the longstanding rural nature of unincorporated Kitsap County. I voted for the County Commissioners in the expectation that they would protect and preserve the agricultural foundation of this County rather than pander to contrary individual interests. I hope that, in acting on the proposed legislation, the Commissioners prioritize existing law and our rural lifestyle. Please do not make me regret my votes for you.	Bainbridge Island	Washington
9/23/2025 4:49 PM	293	Beth	Berglund	Thank you for your thoughtful work on the Rural and Resource Lands Chapter. I support the draft definition of "rural character" provided on page 1-2 of the draft. One of the most significant threats to rural character in North Kitsap is motor vehicle traffic along SR 104, especially during summer months and weekends when travelers move between metropolitan Seattle and the Olympic Mountains/National Park. Along this same rural corridor, two major projects are underway: (1) the PG Forest Heritage Park, a regional destination with world-class mountain bike trails and jump courses, and (2) the redevelopment of Historic Port Gamble, an infill project which includes approval for more than 200 new homes as well as a number of features to attract tourists. Both projects will be valuable assets to the residents of North Kitsap and to its business economy. It will also increase traffic pressures along SR 104. I urge the County to require / perform a comprehensive traffic study focused on the segment of 104 & Bond near the Streibel's Corner Employment Center. This study should assess the combined, fully built-out traffic impacts of both projects. The findings will be essential to (1) identify and implement traffic mitigation measures, and (2) guide appropriate decisions on future development applications.	Kingston	Washington
9/23/2025 4:53 PM	294	Chris	Jerue	Please do right by our local farmers, and backyard poultry people! Do not implement the new wild requirements for livestock in Kitsap County. I like living in Kitsap County, but the county has for the last 5 plus years been going down a path of destruction and existing to only cater to Seattle. This county is turning into somewhere that is not a home to people, and we must take action! Small farmers and backyard poultry keepers are an important piece of our local economy; this is a livelihood by many, and many who are not, and live in this county love to support these small farmers. This keeps money circulating through our community instead of sending it to the rich and elite through big chain grocery stores. Local small farmers are a go to for affordable food for the community, and of higher quality! We live in an area prone to natural disasters, earthquakes being the big one. When that time comes, you are going to wish you had plenty of small farmers because we will not be getting food in, we will be relying on our neighbors, all of us taking care of one another. The update to section 17.445.070 of the county code will drive small farmers out of business and prevent Kitsap county citizens from keeping backyard poultry. The requirement to have an approved farm plan to keep any livestock on the property is not realistic and the conservation district is not able to provide services to the thousands of livestock owners and small farmers within Kitsap county. Currently they cannot, and this will make matters far worse! This will immediately force many local producers out of the market. The only thing this helps is developers who are destroying this county.	Bremerton	Washington

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Date Submitted	Id	Name First	Name Last	Comments	City	State
9/23/2025 4:54 PM	295	Rick	Hein	I am strongly against the proposed changes to the Equine Facility code here in Kitsap County. I urge the commissioners to vote against these changes	Port Orchard	Washington
9/23/2025 4:58 PM	296	Jeff	Tracy	Opposition to Horse Facilities Draft Code: Dear Commissioners, I'm writing to voice my concern and opposition to amending the Code to, basically, outlaw Horse Facilities. While I'm sure you are hearing from a wide variety of people, I suspect that the vast majority are against destroying the incredible value that these horse facilities bring to Kitsap County's residents, including children. Candidly, I'm at a loss for how this has even been proposed as even a minimal amount of research and study would lead to the clear realization that horses and horse stables are vital the Kitsap County's culture and way of life. My daughter, a freshman at BHS, has attended a barn in Poulsbo since we moved here four years ago. I can say without any hesitancy that our barn – the horses, the instructors, and the other students – has changed our daughter's life. We moved here 4 years ago from Oklahoma and our barn was the first place that my daughter felt welcomed and accepted. Since starting 4 years ago, she has grown in confidence, athleticism, and ability, all the while making memories with friends, family and instructors that she will carry with her forever. Without our barn and horses, she wouldn't be the confident young woman she is today. In addition to directly harming children, there are significant legal issues facing the proposed change, including, but not limited to, federal law and Washington state law that clearly supports and recognizes the value of equine operations (See the GMA, Washington's Right-to-Farm Policy, and the Equine Activity statutes, etc.). As a concerned citizen and Kitsap County resident, I would advise extreme caution in outlawing an activity that brings so much good to young people, Kitsap County, and the PNW.	Bainbridge Island	Washington
9/23/2025 4:58 PM	297	Rebekah	Mundell	The proposed regulations on horse facilities are not only unreasonable, but truly detrimental to our community, our agricultural industry, and the broader ecosystem. From an educated perspective, and with real-world experience in this field, it is clear that these rules will create far more harm than good. Anyone with genuine knowledge of agriculture and animal husbandry will tell you that such restrictions undermine community development and animal welfare. Families and individuals will no longer be able to afford to keep animals, forcing many to relocate them to inadequate environments. This will diminish the number of well-cared-for animals and erode the foundation of our farm and equestrian communities. It is also important to recognize the essential role equestrian facilities play in our communities. These facilities provide safe spaces for youth to learn responsibility, discipline, and leadership while working with animals. They foster healthy lifestyles, mentorship, and community connection, and they keep young people engaged in positive, character-building activities. Without accessible equestrian facilities, countless youth and families would lose opportunities that shape lifelong values and skills. Agriculture is the backbone of our nation. Without viable farms, ranches, and equestrian facilities, we will increasingly rely on outsourced goods from other countries. This weakens our food security and risks collapse of both our agricultural system and the ecosystems that depend on it. Washington State and the United States as a whole cannot afford such a loss. Please take the time to consult with educated professionals who work daily in agriculture and equestrian care. They will affirm that these regulations are detrimental and unsustainable. Our agricultural industry feeds this nation; if we wish to continue having access to quality food, thriving communities, and meaningful opportunities for youth, we must ensure that farms, ranches, and equestrian barns are supported, not regulated out of existence.	Kingston	Washington
9/23/2025 5:03 PM	298	Jennifer	Heishman	Please consider the positive offerings that livestock and equines have on the very fabric and quality of our Kitsap County. It's a huge part of why people want to live here. Many small farms and businesses on small acreage would not be able to comply to these proposed rules, which would then put them out of business. We need more small businesses to thrive, not less. These animals and their caretakers offer so much to our community. Lets do something to support their offerings - perhaps the county could support/offer a manure composting facility for small farm owners to truck their manure to and then compost it and donate to gardeners/small scale farmers! Help serve the community with brainstorming beneficial solutions and support! Thank you for reading and considering my comments.	Bainbridge Island	Washington
9/23/2025 5:14 PM	299	Ray	Cramer	Dear Commissioners, I am opposed to the draft code for equestrian facilities as I believe they are likely to kill an entire business sector and change the rural nature of the county irrevocably. The code seems to have been made without involving equestrian facilities as partners, would affect therapeutic and regular riding programs and would affect the many small businesses such as farriers, supply stores and animal vets that contribute to the county economy. The code also seems to treat small riding barns as if they are large industrial facilities. I suggest partnering with equestrians, adopting best management practices for impacts, and holding onto the rural character of the county as well as the economic sector that goes with riding barns.	Bainbridge Island	Washington
9/23/2025 5:17 PM	300	Diana	Everist Cox	REgarding new Horse Property codes, I think you have probably received many comments about some of the unreasonable code measures in the proposal (like the 200 foot setbacks that would impact heavily on some oddly allowed lots). I do support any codes that increase healthy and safe environments including fire codes and management of waste. Several years ago I was in a facility on Bond/Highway that was a mess (and owned by a Kitsap Govt. manager) with mountains of manure that washed across a drive down a hill. I would sure not want to be on a well in the vicinity. Other facilities I've used were great. Don't go overboard is what I recommend. The rural nature of our county is what keeps me paying property taxes. Many folks can't afford the cost of lots of land so stables are their only alternative (including military personnel) and if you look at some parts of the country that emphasize horse ownership you'll see it can be quite lucrative for the county coffers as well.	Kingston	Washington
9/23/2025 5:21 PM	301	Christina	DiLeo	Things need to be easy for people to grow their own food, on their own property, especially in times like today where food prices keep soaring.	Port Orchard	Washington
9/23/2025 5:35 PM	302	Gary	Wilmot	In regards to the proposal to eliminate horse riding lessons, I am sadly surprised and am wondering what the motivation is to either severely restrict or totally eliminate these activities. Many years ago, my child attended horse camp over the summer. It was a fabulous experience for her. Why would you take these experiences away from kids? Interacting with horses builds confidence for children, it creates a sense of accomplishment, it teaches physical labor, and it helps kids grow. Why take that away from kids? Additionally, the removal of these opportunities seems anti thetical to goals of retaining the rural characteristics in Kitsap county.	Bainbridge island	Washington
9/23/2025 5:48 PM	303	Jeffrey	Osborn	I strongly object to the proposed planning language that would restrict or inhibit equestrian facilities in our community. These facilities provide invaluable opportunities for children to engage in horseback riding—a unique activity that fosters responsibility, confidence, and a deep connection to animals and nature. Limiting access to equestrian programs would take away an enriching outlet that benefits youth both mentally and physically. We should be expanding, not restricting, opportunities that support healthy, outdoor recreation for our children.	Kingston	Washington
9/23/2025 5:48 PM	304	Sharon	Pearl	I am against this attempt to limit our land rights! Truly communism getting closer to taking more and more of our rights away!!!	Seabeck	Washington

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Date Submitted	Id	Name First	Name Last	Comments	City	State
				APP-ID: 57 Moran The owners of this 5.21 acre rural residential property are Moran Humberto and Larios Adriana Tovar. The owners seek a rezone from Rural Residential to Rural Industrial. As noted by the staff, the site contains a general purpose building, an unpaved driveway and a parking area. The remainder of the property is forested. Access is from SR-3. A wetland delineation report provided by the applicant notes that a Category III wetland is on the west side of the property. A linear area of high erosion hazard extends through the middle of the property. The property is significantly encumbered by critical areas and buffers. The owners also own a 4 acre parcel to the north, zoned rural residential and developed with a single family residence and a detached garage built in 1964. The staff reports significant non-compliance for the owners' four acre property immediately adjacent to the subject property. "An active code enforcement matter (Case#CC 220108) exists for the property. An inspection on 3/17/2022 noted "crew moving dirt, grading are for new building with no permits, new structures built without permits, old garage converted into and used as office for commercial business in residential area, running contractor storage area without permits with standing water/wetlands on west side of parcel, no BMPs in place, truck traffic tracking mud, work continued after stop work was posted." Hearing Officers routinely deny permits for violations of County Ordinances and State Law. Here the owners are seeking huge financial gain by a rezone from Rural Residential to Rural Industrial. You have to admire the "hutzpah" of the owners in seeking the rezone despite the ongoing and active code enforcement on the owners' adjacent property. In the event that the Commissioners grant this rezone, the decision is very likely to be reversed on appeal, potentially with costs assessed against the County. In implementing Resolution No. 117-2025, the staff must answer the question of "how circumstances related to the proposed amendment and/or the area in which the property affected by the proposed amendment is located have substantially changed since the adoption of the Comprehensive Plan or applicable development regulations."	Kingston	Washington
9/23/2025 6:27 PM	305	April	Ryan	In the staff report, the staff notes that there has not been a change in circumstances since the adoption of the 2024 Comprehensive Plan. "However, because this proposal was initially submitted in 2022, staff also considered whether circumstances had changed since the adoption of the 2016 Comprehensive Plan. At this point, the staff failed to follow through with the directive of Resolution No. 117-2025; here is the exact text from the staff report: (TO BE INSERTED, SUMMARY OF CHANGES, IF ANY, IN THE AREA OF THIS PROPOSED AMENDMENT SINCE 2016.) (Capitalization added.) The Commissioners must deny this reclassification request. The staff report is incomplete. The proposed changes will give a huge economic benefit to the applicant while violating the Growth Management Act. An active code enforcement matter (Case#CC 220108) exists for the owners' adjacent property. An inspection on 3/17/2022 noted "crew moving dirt, grading are for new building with no permits, new structures built without permits, old garage converted into and used as office for commercial business in residential area, running contractor storage area without permits with standing water/wetlands on west side of parcel, no BMPs in place, truck traffic tracking mud, work continued after stop work was posted." The proposed changes will provide a huge economic benefit to the applicant while violating the Growth Management Act, the Clean Water Act, RCWs and Kitsap County ordinances. C. APP-ID Stokes/Campbell Owners Jeff Stokes and Craig Campbell seek a rezoning from rural protection to rural commercial of 7.66 acres. The site is five parcels that total 7.66 acres in size, under the ownership of the two parties. There is a single family residence on one parcel and a mobile home on another parcel, with the remainder of the site being forested. Access is from SE Mullenix Road. The largest parcel and the northeast parcel are heavily encumbered by critical areas. Burley Creek, a Type F stream, runs through these properties with a mapped wetland corridor. Areas of seismic and geologic hazards are on three of the five properties. In implementing Resolution No. 117-2025, the staff must answer the question of "how circumstances related to the proposed amendment and/or the area in which the property affected by the proposed amendment is located have substantially changed since the adoption of the Comprehensive Plan or applicable development regulations." In the staff report, the staff notes that there has not been a change in circumstances since the adoption of the 2024 Comprehensive Plan. "However, because this proposal was initially submitted in 2022, staff also considered whether circumstances had changed since the adoption of the 2016 Comprehensive Plan. At this point, the staff failed to follow through with the directive of Resolution No. 117-2025; here is the exact text from the staff report: (TO BE INSERTED, SUMMARY OF CHANGES, IF ANY, IN THE AREA OF THIS PROPOSED AMENDMENT SINCE 2016.) (Capitalization added.) The owners have submitted at least three prior requests for rezoning; all were denied. 2006-Reclassification request #112 was denied; subject parcel is not located within a water or sewer service district. Almost a third of the site appears to be constrained by a wetland and its buffer. Surrounding uses consist of residential, undeveloped and one stand alone commercial parcel to the south. The parcels are designated Rural Protection and are about one-half mile from the POSK preferred alternative boundary. 2009-Permit # 09-65996 "Comp Plan Amendment-Site Specific Application. Denied 2015-Permit # 15-00741 "Comp Plan Amendment-Site Specific Application. Denied/Withdrawn The Commissioners must deny this reclassification request. The staff report is incomplete. The proposed changes will give a huge economic benefit to the applicant while violating the Growth Management Act, the Clean Water Act, RCWs, and Kitsap County ordinances.. Over the past nineteen years, Kitsap County's Commissioners have denied every prior request for rezoning.		
9/23/2025 6:29 PM	306	April	Ryan	C. APP-ID Stokes/Campbell Owners Jeff Stokes and Craig Campbell seek a rezoning from rural protection to rural commercial of 7.66 acres. The site is five parcels that total 7.66 acres in size, under the ownership of the two parties. There is a single family residence on one parcel and a mobile home on another parcel, with the remainder of the site being forested. Access is from SE Mullenix Road. The largest parcel and the northeast parcel are heavily encumbered by critical areas. Burley Creek, a Type F stream, runs through these properties with a mapped wetland corridor. Areas of seismic and geologic hazards are on three of the five properties. In implementing Resolution No. 117-2025, the staff must answer the question of "how circumstances related to the proposed amendment and/or the area in which the property affected by the proposed amendment is located have substantially changed since the adoption of the Comprehensive Plan or applicable development regulations." In the staff report, the staff notes that there has not been a change in circumstances since the adoption of the 2024 Comprehensive Plan. "However, because this proposal was initially submitted in 2022, staff also considered whether circumstances had changed since the adoption of the 2016 Comprehensive Plan. At this point, the staff failed to follow through with the directive of Resolution No. 117-2025; here is the exact text from the staff report: (TO BE INSERTED, SUMMARY OF CHANGES, IF ANY, IN THE AREA OF THIS PROPOSED AMENDMENT SINCE 2016.) (Capitalization added.) The owners have submitted at least three prior requests for rezoning; all were denied. 2006-Reclassification request #112 was denied; subject parcel is not located within a water or sewer service district. Almost a third of the site appears to be constrained by a wetland and its buffer. Surrounding uses consist of residential, undeveloped and one stand alone commercial parcel to the south. The parcels are designated Rural Protection and are about one-half mile from the POSK preferred alternative boundary. 2009-Permit # 09-65996 "Comp Plan Amendment-Site Specific Application. Denied 2015-Permit # 15-00741 "Comp Plan Amendment-Site Specific Application. Denied/Withdrawn The Commissioners must deny this reclassification request. The staff report is incomplete. The proposed changes will give a huge economic benefit to the applicant while violating the Growth Management Act, the Clean Water Act, RCWs, and Kitsap County ordinances.. Over the past nineteen years, Kitsap County's Commissioners have denied every prior request for rezoning.	Kingston	Washington

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Date Submitted	Id	Name First	Name Last	Comments	City	State
9/23/2025 6:30 PM	307	Cammy	Mills	I'm deeply concerned about the proposed changes for equestrian facilities. The changes, as written would make it impossible to run an equestrian facility on smaller lots and because of the additional permitting required for events such as clinics, make it overly difficult to run an equestrian business without any appreciable benefit. The setback requirements proposed, would make the area on a five acre square lot too small to make it practical to keep even one horse. They also seem to be written without regard to recommendations regularly given by Kitsap Conservation District. DCD should be writing code requirements that align with best management practices from KCD. In addition, I'm concerned about the requirements for permitting for events such as clinics. Equestrian facilities don't typically make a profit off of boarding horses. They need to have additional revenue from lessons, clinics, shows, etc. to remain solvent. In the year of the rural, these recommendations seem designed to eliminate horses from the rural character of our county. I'm generally a fan of the Growth Management Act. I live in a suburban area of unincorporated Kitsap and could never keep my horses at home with me. Allowing equestrian facilities allows people like me to live in areas of dense growth while still have access to the benefits of living near rural areas. Please consider changing or eliminating the setback requirements and eliminating the need for additional permitting for clinics and other events.	Port Orchard	Washington
9/23/2025 6:31 PM	308	April	Ryan	APP-IE: 07 Skrobut-McCormick Lands Co. "This site is a 20.95 acre parcel that is currently developed with a mobile home, carports and garages, two office buildings, a storage building and a shop building. The remainder of the property is forested. (emphasis added.)" The applicant indicates that there is a stream abutting the south boundary of the property that discharges into a ditch, which was associated with a former road northeast of the property. Critical areas maps show a Type N stream to the south that may have buffers located on the subject property or extending into the property. The staff noted that "the Coulter Creek Heritage Park is nearby on the north side of Lake Flora Road. The Trophy Lake Golf Course is to the east. Several single-family homes are also located to the east. The site is bordered by SW Lake Flora Road to the north. The site is approximately 0.8 miles south of the City of Port Orchard. The present Comprehensive Plan Map and zoning for the property is Rural Wooded." (emphasis added.) Rural wooded zoning allows for forest resource uses and limited residential uses with a maximum density of 1 dwelling unit per 20 acres. As part of the Findings of Fact, the staff noted that adjacent properties are zoned rural wooded, rural residential and park. In implementing Resolution No. 117-2025, the staff must answer the question of "how circumstances related to the proposed amendment and/or the area in which the property affected by the proposed amendment is located have substantially changed since the adoption of the Comprehensive Plan or applicable development regulations." In the staff report, the staff notes that there has not been a change in circumstances since the adoption of the 2024 Comprehensive Plan. "However, because this proposal was initially submitted in 2022, staff also considered whether circumstances had changed since the adoption of the 2016 Comprehensive Plan. At this point, the staff failed to follow through with the directive of Resolution No. 117-2025; here is the exact text from the staff report: (TO BE INSERTED, SUMMARY OF CHANGES, IF ANY, IN THE AREA OF THIS PROPOSED AMENDMENT SINCE 2016.) (Capitalization added.) The staff report notes that in the case of Rural Commercial/Industrial and Type III LAMIRD Site Specific Amendment requests, every one of seven requirements must be satisfied for a recommendation for approval. The very first requirement is "demonstration of an unmet need for the proposed land use designation in the rural area." The staff states that "neither the 2024 Comprehensive Plan nor other existing studies indicate whether there is an existing unmet need for rural commercial or industrial lands." The staff "fudges" the additional six requisite criteria to attempt to "justify" the reclassification. The Commissioners must deny this reclassification request. The staff report is incomplete. The proposed changes will provide a huge economic benefit to the applicant while violating the Growth Management Act, the Clean Water Act, RCWs and Kitsap County ordinances.	Kingston	Washington
9/23/2025 6:38 PM	309	Hannah	Orando Baldus	I'm Hannah Orando Baldus. I, along with my husband, farm flowers and market veggies & fruit on 19 acre farm in Silverdale. I'm also a member of the Kitsap Farmland Preservation Coalition (KFPC). Missing from the current plan is filling the Agricultural Advisory Council. This council has been in the comp plan since 2008 (!!!!), and the KFPC has been advocating for this Council to be seated for the past two years. We need farmer representation to speak on behalf of agriculture at the county level. Let's follow in the footsteps of our surrounding counties and support Kitsap Agriculture in this way! I implore you: local farmland and farms are invaluable to our local economy and our county's ability to be resilient in the face of rising food prices, the reality of a warming climate, and unknowns in the future (such as a pandemic, case study of the importance of local farms during the COVID pandemic). The Ag Advisory Council has been put off long enough. It's now time; please seat the Ag Advisory Council now. In this same vein, it's vital to defer any AG Code updates until the Ag Advisory Council is seated and can give input. We have an incredibly diverse group of farmers here in Kitsap. And the Ag Council consisting of diverse stakeholders will ensure that code changes make sense and support farmers (who in turn support our communities). The updated Ag code must reflect a commitment to agriculture in Kitsap County and the best way to do this is to get input from our farmers.	Silverdale	Washington
9/23/2025 7:04 PM	310	April	Ryan	Change to 2024 Climate Change Element (p. 24) Edit your suggested change to read: Policy 7.3 Encourage owners of private forests and designated Forest Resource Lands to keep these properties forested or in continuing timber production using best available science that includes climate change science. Strategy 7a. I agree with your change for the 2024 Climate Change chapter, except please drop "in production." While I encourage a focus on keeping forestlands forested, the county needs to encourage leaving forests intact whenever possible - using carbon offset credits, for example. Thinning and harvesting in sustainable ways should be encouraged, and industrial-style clear-cutting which exacerbates heat and drought conditions of climate change should be discouraged, possibly with heavy taxation to compensate for environmental damage.	Kingston	Washington
9/23/2025 7:11 PM	311	Erin	Jones	I would like to express my opposition to the proposed code updates for equestrian properties and activities. They seem to single out horse activities and are not feasible for nearly all equestrian properties. The issues that are coming up for blending rural land and housing developments are caused by oversight of the county in zoning designation. Our 48 year old, 5 acre family farm, is bordering on the Stetson Heights developement. Our barn is about 70 feet away from and 30 feet down hill from the back fences of the homes. We endured 7 years of construction. Dust, noise, vibration, and flooding are just some of the things we have endured. Neighboring 5 acre properties on both sides of us needed to have their homes repaired due to the construction vibration. It seems that this developement should have been designed with the setbacks from our property that you are proposing for horse properties. The perspective and life styles of rural residence should be considered equally to developement interests.	Indianola	Washington

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Date Submitted	Id	Name First	Name Last	Comments	City	State
9/23/2025 7:52 PM	312	Marla	Powers	September 23, 2025 Scott Diener, Planning Manager SDiener@kitsap.gov Heather Cleveland, AICP Long Range Planner HCleveland@kitsap.gov Dear Mr. Diener, Thank you for the opportunity to comment on the proposed changes to the Rural and Resource Lands Chapter Update to the Comprehensive Plan, Code Updates, and the Reclassification Requests. The Port Gamble S'Klallam Tribe has been engaged in the Year of the Rural from the beginning and has met with Long Range Planner Heather Cleveland independently and as part of the County's Tribal Coordination Meetings. We appreciate the conversations that we have had with your staff about this important topic, and our comments below are a continuation of concerns already laid out for county staff and now the Planning Commissioners. Thank you for your consideration of the comments below. Port Gamble S'Klallam Tribe's Treaty Right Interests The Port Gamble S'Klallam Tribe is a federally recognized Indian tribe and successor in interest to Indian bands and tribes signatory to the 1855 Treaty of Point No Point, which among other things reserved fishing, hunting, and gathering rights and led to the establishment of the Port Gamble S'Klallam Reservation in Kitsap County, Washington. The Port Gamble S'Klallam Reservation sits on the eastern shore of Port Gamble Bay and a portion of Hood Canal, in the northwestern portion of Kitsap County. Since time immemorial, the Port Gamble S'Klallam Tribe and its predecessors have occupied and utilized vast areas of land and water in the Hood Canal, Salish Sea, and the Strait of Juan de Fuca including the western portions of Kitsap County that contain watersheds that drain into the Hood Canal, and the Olympic Peninsula to support the S'Klallam way of life. Fish and fish habitat are crucial to the cultural, spiritual, subsistence and commercial activities of the Port Gamble S'Klallam Tribe. A change in how future development in the county is needed to support and enhance the protection of essential habitats and cornerstone species. A Report from the Treaty Indian Tribes in Western Washington, Treaty Rights At Risk, published July 14, 2011, states that "Habitat loss and degradation are the biggest contributors to the decline of the salmon resource..." (pg. 7) The issues identified in this report, losing habitat, disparate standards for harvest vs. habitat, need for coordinated leadership are all still applicable fourteen years later. We are still seeing habitat loss and more enforcement /restrictions on harvest than habitat degradation. Land Use & Zoning Comments The connection between Rural and Resource Lands Element and implementation updates in the Zoning Code are missing. For example, there are no changes to zoning or to the growth projection of 24% (Comprehensive Plan pg. 24) in rural areas that would preserve rural character. Limiting Rural Residential zoning expansion and directing rural parcels to aggregate in size (with willing property ownership) are steps the county can take to implement the Rural and Resource Lands Element. Limiting development in rural areas will have a significant positive impact on preservation of rural character and protections of fish and wildlife habitat conservation areas such as streams, riparian habitat, and wetlands. If these changes are not to specific zoning standards and growth mandates, how will rural development and protection of rural character be implemented? Change in Rural Land Use Designations. Please provide the tribe with the following data: How have the number of acres changed for Rural Residential, Rural Protection, and Rural Wooded since the 1998 Comprehensive Plan? Please acknowledge that Tribal Lands are part of Kitsap County and make up a certain acreage of county land/land use. Cluster Development is considered a tool for rural development. A tool that protects more critical areas by consolidating development into a denser area. This type of development is not supported by the tribe. When viewed from the street or when parcel size is checked on the parcel search you see denser development, not consistent with rural character. Add provisions that emphasize ADUs are encouraged in urban growth areas or LAMIRD, not in rural areas. Rural areas are not appropriate for middle housing accommodations. Reclassification requests should not be approved. Additional rural development is not needed in the county. Development increases in rural areas disproportionately impact critical areas and environmental integrity. Water Resources On the draft Rural and Resource Lands Chapter, Rural Environment section, "protect natural ecosystems..." goal, I recommend adding a policy line to the effect of "Identify and protect natural areas contributing to increased aquifer recharge." This is related to but a broader issue than the KNRRAMP policy goal – there's a need to update our common understanding of which land areas are contributing most to aquifer recharge (emphasizing water quantity as opposed to quality – the current expansive mappings of critical aquifer recharge areas are more focused on the vulnerability of shallow aquifers to contamination). This is important both for outright protection of key recharge areas to allow future precipitation to infiltrate (i.e. preventing additional impermeable surfaces) but also understanding that these sites may offer the opportunity to conduct enhanced or managed aquifer recharge through constructed wetland systems or recycling of treated wastewater Wildlife Corridors Small peninsula areas isolated by water and development, such as the PGST reservation, face critical ecological challenges without connections to larger mainland habitats. Wildlife populations suffer from genetic bottlenecks, disrupted migration patterns, and inability to adapt to climate change. Climate change adds urgency to corridor development in isolated regions, as species must be able to shift their ranges and elevations as temperatures rise. Wildlife corridors serve as vital lifelines, allowing animals to move between habitat patches for breeding, foraging, and seasonal migration. This genetic exchange prevents inbreeding depression and maintains the genetic diversity necessary for species adaptation and survival. For culturally significant species like deer, black bears, elk, and mountain lions that require large territories, corridors enable access to the expansive ranges they need to find mates and adequate resources. These isolated populations gradually decline toward local extinction as they cannot maintain viable breeding numbers or fulfill essential ecological functions. Establishing wildlife corridor connections to the Kitsap and Olympic peninsula's larger habitat zones is essential for preserving wildlife species biodiversity, and ensuring species can survive environmental changes. See collection of maps below: a Connected Landscapes of Statewide and Regional Significance overlaid on Connectivity Hotspots and conversion Risk (Figure 15: Washington Habitat Connectivity Plan 2025) shown above. PGST reservation and surrounding land was left without any value and virtually left out of this update. Connected Landscapes of Statewide and Regional Significance overlaid on Connectivity Hotspots and Conversion Risk (Figure 15: Washington Habitat Connectivity Plan 2025) shown above. Black circle indicates PGST reservation. Blue shaded arrow indicates wildlife corridor connection gap to PGST reservation. Shaded areas represent US, Tribal, and State protected areas. Areas outlined in blue represent the major gaps between protected areas surrounding PGST reservation and wildlife corridors. These areas of where future development and planning need to account for wildlife corridor connectivity to recently updated Washington Habitat Connectivity Plan. Outline of PGST wildlife corridor currently in development. Connects north to south from Hansville Block, through Reservation, to Miller Lake. This is an attempt to connect already protected critical areas within the corridor. We look forward to working with you on implementing these changes. Much more work is yet to be done to ensure our sovereign tribal treaty rights are protected for the next seven generations. Especially as we brace for the impacts that climate change and continued development will have on all our natural resources. Thank you again for the opportunity to comment during this process. Should you have any questions, please contact Marla Powers at the address or phone number below. Sincerely, Marla Powers, Environmental Planner, Natural Resources Department Port Gamble S'Klallam Tribe 31912 Little Boston Road NE Kingston, WA 98346 (360) 689-7551 mpowers@pgst.nsn.us Enclosure: Treaty Rights At Risk Report Puget Sound Regional Council Vision 2050	Kingston	Washington

Year of Rural Comment Form					City	State
Date Submitted	Id	Name First	Name Last	Comments		
9/23/2025 8:40 PM	313	Michel	Spruance	Objection to Proposed Changes to Rural Code Regarding Equestrian Facilities Dear Members of the Planning Commission and Board of County Commissioners, Please file this as an objection to the proposed changes to Chapter 17.455 (Agriculture Code) of the Kitsap County Zoning Code, specifically the addition of Section 17.455.075 regarding equestrian facilities. I am a resident of Kitsap County and a mother of two daughters who ride horses here. Riding has been a gift unlike any other, both because of the horses and the barn community they are part of. They have learned to be deeply committed to the horses themselves, the community they are part of, and even have conversations about what it means to steward the land and be the kind of horse people that help create a healthy community. We never imagined our kiddos would be able to access riding when we lived in the city, and living in Kitsap county opened a world to them that has been life changing. Living in a rural community- one that has space for a variety of land use - is part of why we live here and we want to see these diverse rural experiences protected not only for us, but also for generations to come. My understanding is that the proposed changes would make it nearly impossible for most training and boarding facilities in the region to continue. If these facilities are impacted they way I understand, not only will the community loose access to the incredible gifts of equine education, but an entire economic ecosystem will be impacted, from vets, to feed stores and beyond. I recognize that at as Kitsap county grows, we will need to weigh a myriad of seemingly divergent needs. I understand that some guidelines may need to be implemented for equine facilities, and I respectfully ask that you reconsider what has been proposed here. I believe many of us want to find the balance between growth and the wonderful aspects of our rural community and that there must be a better way to navigate any conflicts through our shared values. Thank you for your consideration, Michel Spruance Bainbridge Island resident and mother of two girls who ride in north Poulsbo at Gamble Creek Stables and Pony Club Riding Center	Bainbridge	Washington
9/23/2025 9:22 PM	314	J.J.	Wilson	Equestrian Facility Regulations Good evening. My name is J.J. Wilson. My grandparents came to Kitsap County in the 1940s, and in 1968 they built the home I live in today. I bought it to carry on their legacy — to raise my family and to keep alive the rural way of life this county was built on. I have four kids of my own, and I want them to grow up with the same values I did — open space, hard work, and the lessons that come from living around animals. My property is in unincorporated rural Kitsap. This is not city land. This is country land. On our property we have a barn and a riding arena. I keep two horses, and my cousin keeps her two horses there as well. Her sons are active in High School Rodeo and WAHSET (Washington High School Equestrian Team). My four kids are growing up in this same environment. These programs and this lifestyle don't just teach kids how to ride — they teach teamwork, sportsmanship, and horsemanship. They teach kids to care for animals every day, feeding, cleaning, grooming, putting in the work before the reward. They learn responsibility, patience, problem-solving, and perseverance. They get pulled away from screens and devices and into the real world, where they learn discipline, accountability, and the value of hard work. That's the kind of education that builds character — and it's happening right now on our property, for my kids and my cousins' kids alike. And just as importantly, we love inviting friends and family to come ride with us. Sharing these experiences builds community, strengthens relationships, and passes along the same rural values that have been part of my family for generations. And let me be clear, families like mine don't keep horses on small farms to make money. We do it because we love the lifestyle, because we love the animals, and because it feeds the soul. Horses give people peace, purpose, and connection. They're therapeutic. They build confidence. They bring families together. They preserve rural heritage. They tie us to programs like WAHSET, 4-H, FFA, and High School Rodeo that shape strong kids and future leaders. Most of all, they give us joy. This isn't business. This isn't profit. This is passion, therapy, and tradition. This is what makes rural Kitsap worth fighting for. And as the old saying goes — the way to become a millionaire owning horses is to start out as a billionaire. But this proposal would make all that impossible. My property is 333 feet wide. With 200-foot setbacks on each side, there is no space left for paddocks or manure storage. That's not regulation — that's a ban. A ban on families like mine. A ban on kids like my cousins' sons, and on my four kids, who are trying to live the same rural life I grew up in. A ban on rural Kitsap itself. And even if the land dimensions somehow worked, the County is now talking about requiring ACUPs and CUPs. Let's talk about that. These permits cost thousands of dollars in application fees, surveys, site plans, hearings, and professional studies. Families can't afford that on top of feed, vet bills, fencing, and everything else it takes to simply care for our animals. Most of us aren't commercial operations. We're not corporations. We're families raising kids, passing down traditions, and keeping the rural character alive. Forcing us to pay thousands in permits just to keep a few horses isn't regulation, it's exclusion. It turns horse ownership into something only the wealthy can afford. Where's the compassion in that? Where's the understanding for the average family who just wants to live the lifestyle this county was built on? And here's the part that doesn't make sense: why are horses being singled out? Cows, goats, pigs and chickens, they all produce manure. If manure is the issue, then why don't these same rules apply to every barnyard animal? What's the difference between cow manure, goat manure, chicken manure, and horse manure? If you can't answer that, then this isn't about protecting public health, it's about politics. It looks a lot like one or two complaints caught the ear of some friends in government, and now every horse owner in Kitsap is being punished for it. We already have rules on the books that deal with every concern you've mentioned. The Kitsap Conservation District already regulates farm plans for manure and runoff. The Health District already protects wells and drinking water. Nuisance codes already cover odor and dust. Fire codes and traffic laws already cover road safety. The tools already exist. So instead of duplicating laws, why not enforce the ones we already have? Why punish responsible families and responsible horse owners for problems that are rare, and already solvable under current law? Closing Questions So, I want to end with some questions that this community deserves clear answers to: •Who made the complaints that triggered this process? Were these one or two neighbors, or was there broad community demand? If it was only one or two, why are we rewriting the entire zoning code for thousands of families because of one complaint? •How many documented cases exist where existing laws weren't enough? Show us the proof. How many times have the Conservation District, the Health District, nuisance codes, or traffic laws failed to solve the problem? Or are we rewriting zoning without evidence that the current tools don't work? •What specific holes are you trying to fill that current rules don't already cover? If runoff is the issue, that's already covered under farm plans. If odor is the issue, nuisance laws already cover it. If traffic is the issue, fire and road standards already apply. So, what exactly is missing? Can you name one gap that truly exists? •Why are horses being singled out while every other barnyard animal gets a pass? If manure is the concern, what's the scientific difference between cow manure, goat manure, chicken manure, and horse manure? If you can't answer that, then why are horse families being treated differently? •Why duplicate laws instead of enforcing the ones we already have? Is the real issue that it's easier to write new regulations than to enforce existing ones? Because if enforcement is the problem, adding new rules won't fix anything. •Why regulate families who aren't running businesses? Most of us aren't boarding barns or commercial stables. We're families raising kids and keeping a handful of horses. Why are we being treated like corporations when all we're doing is living the rural lifestyle Kitsap was built on? •Has the County considered the unintended consequences? If families can't keep horses, many will sell their land. And that land won't stay green, it'll turn into subdivisions. Is the County prepared to admit this policy will accelerate sprawl instead of preserving rural character? •Where is the public demand for this? How many residents actually asked for these changes? Or is this a solution in search of a problem — one person's complaint driving county-wide regulation? •What's the true intent here? Is this about health and safety, or is it about control? Because unless you can prove widespread harm, this proposal looks like government overreach — not protection of the public." Final Question So again, I'll ask: Who complained, what's broken, and what hole are you really trying to fill? Because if you can't answer those questions, then this isn't about protecting Kitsap County, it's about regulating rural families out of existence. FOIA/Public Disclosure request Dog complaints vs Equine complaints.	Port Orchard	Washington

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Date Submitted	Id	Name First	Name Last	Comments	City	State
9/23/2025 9:24 PM	315	J.J.	Wilson	So, I want to end with some questions that this community deserves clear answers to: •Who made the complaints that triggered this process? Were these one or two neighbors, or was there broad community demand? If it was only one or two, why are we rewriting the entire zoning code for thousands of families because of one complaint? •How many documented cases exist where existing laws weren't enough? Show us the proof. How many times have the Conservation District, the Health District, nuisance codes, or traffic laws failed to solve the problem? Or are we rewriting zoning without evidence that the current tools don't work? •What specific holes are you trying to fill that current rules don't already cover? If runoff is the issue, that's already covered under farm plans. If odor is the issue, nuisance laws already cover it. If traffic is the issue, fire and road standards already apply. So, what exactly is missing? Can you name one gap that truly exists? •Why are horses being singled out while every other barnyard animal gets a pass? If manure is the concern, what's the scientific difference between cow manure, goat manure, chicken manure, and horse manure? If you can't answer that, then why are horse families being treated differently? •Why duplicate laws instead of enforcing the ones we already have? Is the real issue that it's easier to write new regulations than to enforce existing ones? Because if enforcement is the problem, adding new rules won't fix anything. •Why regulate families who aren't running businesses? Most of us aren't boarding barns or commercial stables. We're families raising kids and keeping a handful of horses. Why are we being treated like corporations when all we're doing is living the rural lifestyle Kitsap was built on? •Has the County considered the unintended consequences? If families can't keep horses, many will sell their land. And that land won't stay green, it'll turn into subdivisions. Is the County prepared to admit this policy will accelerate sprawl instead of preserving rural character? •Where is the public demand for this? How many residents actually asked for these changes? Or is this a solution in search of a problem — one person's complaint driving county-wide regulation? •What's the true intent here? Is this about health and safety, or is it about control? Because unless you can prove widespread harm, this proposal looks like government overreach — not protection of the public." Final Question So again, I'll ask: Who complained, what's broken, and what hole are you really trying to fill? Because if you can't answer those questions, then this isn't about protecting Kitsap County, it's about regulating rural families out of existence.	Port Orchard	Washington
9/23/2025 9:37 PM	316	Jessica	Smith	When I was growing up horses was my go to I went to a camp growing up and after riding there for 10 years I went to a trainer who helped me progress in my riding talent and helped me get my first horse. If you make these changes it won't only hurt me and other people it won't help people who need the therapy of horses or a way to just learn to be able to take care of animals. I grew up with a sister who was abusing my family every time she yelled I would shut down when I would go riding I could escape and be myself I was very shy growing up and being able to ride helped me make friends and to learn so much. I also had my first job to take care of my horse and about 30 other horses if it wasn't for 4h and pony club I wouldn't have met new friends back in 2019 my father Tim Allen died suddenly my go to place to help heal was to my old trainer Jill Seely I started training with her again after my fathers death if it hadn't been for horses I wouldn't be alive today I was also in a abusive marriage and horses helped me get my mental health back in 2023 I was in a horrible car accident and had a fear I would never be able to ride again once my hand healed I been wanting to ride and show again and when I was about to go back to the stables I found out about this and grew angry because something that means so much to me will be taken away. I promise if this is passed this person who was born and raised in Kitsap county will move away when it's time for me to get my own farm because I will know Washington and Kitsap county doesn't care about the lively hood and mental health and the care for youth. If people don't have a barn or stable to learn to take care of horses like I did growing up there would be more people like my biological mother and father who mistreat and starve horses or any kind of animal so having barns stables and farms help people learn and horses have always been part of history native Americans rode them our founding fathers rode them and kept them horses are IMPORTANT	Bremerton	Washington
9/23/2025 10:00 PM	317	Beverly	Parsons	This is an addendum to my submissions on 9/22 and 9/23I provided on behalf of the Kitsap Environmental Coalition working group on the Year of the Rural. I inadvertently missed the following two comments. 1. Regarding Rural Environment in the draft chapter, please add: The protection of wildlife corridors involves not just protection of streams and riparian areas. A goal should be included to identify and map such corridors, identifying key species of concern and to link corridors to allow for movement of species. 2. Regarding Code Update, please add the following: With a more complete identification of priority wildlife corridors, it may be appropriate to review how and where the code should apply. It appears that the Parks Department is planning to conduct a wildlife utilization study of several parks over the next year. This approach could be expanded to include other potentially important areas to start to map wildlife corridors across the County.	Hansville	Washington
9/23/2025 10:20 PM	318	Ken	Needham	In regards to the Kitsap County Zoning Code Equestrian Center Standards and Regulations draft Chapter 17.415. Rural residential land should have permitting processes for commercial businesses that take place on that land to protect neighboring property owners from possible untoward effects of the commercial business. Assessment of impact to the land and neighboring properties should precede granting of that permit. Commercial Equestrian facilities can have high impact on the surrounding neighborhood. We favor return to the oversight of horse boarding facilities (aka; commercial equestrian facilities, commercial stables) that was removed by the adoption of an agricultural code back in 2016. It seems reasonable for the county to regulate on a case-by-case basis the suitability of the land to sustain the proposed business. It seems reasonable to have standards for animal density and environmental impact. It seems reasonable that setbacks for parking, animal enclosures, and manure be included, as setbacks are common for most residential or commercial construction or development code. The role of government as stated in the Kitsap County Mission Statement is "to protect and promote the health, safety and welfare of all County residents in an accessible, efficient, effective and responsible manner." We understand that the situation is complex and not all facilities and neighborhoods are the same. That is why oversight is needed and it is why the term "conditional" is added to the "Conditional Use Permit" language. We support the cooperation between citizens and government and applaud the working groups formed to address these matters.	Silverdale	Washington
9/23/2025 11:49 PM	319	Stephanie	Needham	I support the county providing oversight and regulations over equestrian facilities, as they did prior to 2016. While I appreciate the many and far-reaching benefits that boarding facilities provide, I also know that commercial businesses can affect the lives of their rural neighbors in negative ways. Ambulances must be able to reach residents and take them to the hospital; fire trucks must be able to reach the neighborhood; and neighbors need to be able to evacuate: all without the road being blocked by boarders with trailers. I support oversight of the potential nuisances of dust, odor, and drainage. And, I support defining best practices that protect the environment and the well-being of the animals being boarded. For what it's worth: I am not someone who moved next door to a boarding facility and started complaining. A boarding facility was able to develop without regulation in my neighborhood, negatively impacting safety and peace. I am encouraged to see that the county has formed a working group and hope that these matters can be settled in a way that protects the interests of all parties in a fair manner.	Silverdale	

Attachments

Referenced in comment form – submitted via email due to formatting and maps

**A REPORT FROM THE
TREATY INDIAN TRIBES IN WESTERN WASHINGTON**

Treaty Rights At Risk

**Ongoing Habitat Loss, the Decline of the Salmon
Resource, and Recommendations for Change**

July 14, 2011

Executive Summary

This paper examines how the rights of western Washington treaty tribes to harvest treaty fish and shellfish, and the federal government's salmon and orca protection efforts, are at grave risk. This is being caused by a lack of coordinated federal leadership, a failure to exercise authorities and the disparate application of salmon conservation measures. The U.S. government must step up and provide the leadership needed to resolve these issues if salmon are to be successfully recovered and protected.

Stopping habitat degradation is the cornerstone of salmon recovery, but habitat is still declining.

According to the Puget Sound Chinook Salmon Recovery Plan developed by the state and tribal salmon co-managers and adopted by the National Marine Fisheries Service (NMFS), protecting existing habitat is *the most important action needed in the short term*. Despite this commitment, NMFS' 2010 assessment of the Puget Sound Chinook Salmon Recovery Plan declared that habitat is still declining and protection efforts need improvement.

Tribal harvest is accountable and tribes are doing their share to promote recovery.

In 1974, the federal court decision in *United States v. Washington* – known as the Boldt decision – affirmed the tribes' treaty right to half of the harvestable salmon, and established the tribes as co-managers of Washington fisheries. Initially, this recognition of the tribes' rights led to a significant increase in treaty harvest because the tribes finally were able to catch their share. However, harvest has been and continues to be constrained dramatically by degraded habitat. As a direct result, treaty harvest has been diminished to levels not seen since before the Boldt decision.

Tribal co-management of harvest is governed by the tribes' commitment to support salmon rebuilding efforts. NMFS' own analysis of recovery plan implementation indicates that harvest is doing its share to support salmon recovery. NMFS also concedes that salmon populations in many watersheds cannot recover even if harvest were completely eliminated. Yet, while harvest is accountable for recovery, habitat degradation continues steadily, destroying the salmon resource and along with it, the cultures and communities of the treaty Indian tribes in western Washington.

NMFS is applying disparate conservation standards to harvest actions versus habitat actions, thereby threatening treaty rights and impeding salmon recovery.

NMFS holds the tribes to a different standard than all others by applying more stringent standards to tribal salmon harvest than to actions that degrade salmon habitat. In reviewing harvest decisions, NMFS expects tribal harvest plans to

contribute to salmon recovery over time. In contrast, when reviewing actions affecting Puget Sound habitat, NMFS seeks merely to maintain existing habitat productivity and quantity – regardless of whether it is adequate to support recovery.

NMFS' Biological Opinion and Reasonable and Prudent Alternative (RPA) for the Federal Emergency Management Agency (FEMA) National Flood Insurance Program is a key example of this disparate treatment. This flood insurance program sets the minimum requirements for floodplain management throughout most of Puget Sound. However, NMFS does not require an increase in habitat productivity and quantity, even in watersheds where NMFS concedes that habitat conditions are the key obstacle to salmon recovery. Another example of disparate treatment is NMFS' approach to southern resident killer whales (orca). NMFS claims orca are not recovering because there are too few large chinook salmon for them to eat. But instead of addressing all activities that affect chinook abundance, NMFS looks only to harvest reductions to address the problem.

This overemphasis on harvest restricts the tribes' treaty rights, while ignoring the science that indicates that habitat loss and degradation account for an even greater take of salmon and orca. These discriminatory actions contravene the federal government's trust responsibility to the western Washington treaty Indian tribes and undermine accomplishment of federal fish and wildlife management objectives.

The federal government is not fully implementing its obligation to protect treaty rights.

Salmon recovery is based on the crucial premise that we can protect what habitat remains while we restore previously degraded habitat conditions. Unfortunately, significant investments in recovery may not be realized because the rate of habitat loss continues to outpace restoration. The resulting net decline in habitat demonstrates the federal government's failure to protect the tribes' treaty-reserved rights.

The federal government has existing tools that it could employ to better protect habitat and support salmon recovery, but in many cases those tools are either misapplied or not being implemented adequately. For example, the U.S. Army Corps of Engineers' § 404 permitting authorizes the very same structures that salmon recovery actions seek to remove. Also, the federal government has approved and continues to fund state programs under the guise of coastal zone management that actually impede salmon recovery. For instance, the state's Shoreline Management Act also permits shoreline development for single-family residences, including bulkheads and docks that degrade habitat.

Instream flows also are under assault and need protection from excessive withdrawals. The tribes have pursued a number of approaches to define and

establish the instream flows necessary to protect and restore salmon resources. Unfortunately, each of these efforts has been undermined by flawed state policies that failed to institute a comprehensive effort to establish instream flows. Therefore, federal intervention is needed to adjudicate instream flows that are protective of fish habitat, and consistent with treaty-reserved rights.

Finally, federal agencies such as NMFS have failed to use their authority to prosecute those who degrade salmon habitat. In July 2000, NMFS formally published its policy governing enforcement of the Endangered Species Act (ESA) prohibition against take, and included a series of habitat impacts that would receive “heightened scrutiny.” Although shoreline armoring and riparian vegetation removal were on NMFS’ priority list, there appears to be only one instance of NMFS exercising its enforcement authority over these activities during the past decade.

Salmon recovery crosses many jurisdictions, and leadership is needed to implement recovery consistently across those jurisdictional lines.

The government’s piecemeal approach to recovery has resulted in a lack of agency consistency and ultimately the implementation of federal programs that serve neither to recover salmon nor protect treaty rights. For example, many federally funded environmental and conservation grant programs are not required to protect salmon. Instead, in many cases those programs rely on a planning process that ultimately lets the landowner decide what is best for salmon, even if those choices are contrary to federally approved total maximum daily loads (TMDLs) or federally-approved salmon recovery plans.

Moreover, despite ESA listing, and declining harvest and habitat, basic federal obligations remain unfulfilled. For example, the National Oceanic and Atmospheric Administration (NOAA) and U.S. Environmental Protection Agency (EPA) have failed to use their authority under the Coastal Zone Management Act (CZMA) to protect salmon and treaty rights. The CZMA obligates EPA and NOAA to assure that state nonpoint source coastal protection plans are consistent with applicable federal law, including the Clean Water Act, ESA, and federally secured treaty rights. These plans were supposed to be developed by 1995, but 17 years later, the federal agencies have failed to obtain the state of Washington’s compliance.

Given the critical importance of protecting habitat, it is essential that leadership is exercised to ensure that these basic federal obligations are met, including protection of treaty rights.

The federal government can remedy this erosion of treaty-reserved rights by taking action:

I. Stop the disparate treatment of Indian tribes when applying salmon conservation measures.

- Apply at least as stringent a conservation standard to actions affecting salmon habitat as is applied to salmon harvest.
- Assure that all federal actions affecting habitat contribute to recovery of salmon and orca.
- Develop a comprehensive and timely plan for addressing orca prey consumption needs that does not result in disparate treatment of treaty fishing and addresses all identified factors for decline.

II. Protect and restore western Washington treaty rights by better protecting habitat.

- Require federal funding that supports state programs and pass-through grants to be conditioned so that all funded efforts are designed to achieve consistency with state water quality standards and salmon recovery plan habitat objectives.
- Direct federal agencies to increase enforcement of federal obligations to protect habitat including the ESA and Clean Water Act.
- Direct NMFS and EPA to assure that state Shoreline Master Program updates are consistent with all federal obligations involving treaty rights.
- Direct the Department of Justice to initiate limited water rights adjudications to identify treaty-reserved rights for instream flows in selected watersheds.

III. Establish federal oversight and coordination to align environmental and conservation programs to achieve salmon recovery and protect treaty-reserved rights.

- Oversee and align funding programs to ensure achievement of recovery objectives.
- Unify federal agencies and resolve inter-agency conflicts to support salmon recovery.
- Hold federal agencies accountable for acts or omissions that lead to disparate treatment of tribes and failure to protect treaty-reserved rights.
- Harmonize federal actions to ensure consistency and compliance with federal obligations and treaty rights.

Introduction

“Through the treaties we reserved that which is most important to us as a people: The right to harvest salmon in our traditional fishing areas. But today the salmon is disappearing because the federal government is failing to protect salmon habitat. Without the salmon there is no treaty right. We kept our word when we ceded all of western Washington to the United States, and we expect the United States to keep its word.” – BILLY FRANK JR., CHAIRMAN OF THE NORTHWEST INDIAN FISHERIES COMMISSION

As sovereign nations, 20 treaty Indian tribes in western Washington signed treaties with the United States, ceding most of the land that is now western Washington, but reserving our rights to harvest salmon and other natural resources. For those rights to have meaning there must be salmon available for us to harvest.

Today our fishing rights have been rendered almost meaningless because the federal and state governments are allowing salmon habitat to be damaged and destroyed faster than it can be restored. Salmon populations have declined sharply because of the loss of spawning and rearing habitat. Tribal harvest levels have been reduced to levels not seen since before the 1974 *U.S. v. Washington* ruling that reaffirmed our treaty-reserved rights and status as co-managers with the right to half of the harvestable salmon returning to Washington waters.

As the salmon disappear, our tribal cultures, communities and economies are threatened as never before. Some tribes have lost even their most basic ceremonial and subsistence fisheries – the cornerstone of tribal life.

The Northwest tribes are heartened by millions of dollars and years of focused cooperative work that have been spent on salmon recovery in the region during the past two decades. We have been at the center of most of these efforts. While we have made progress in some areas, the overall quality and quantity of salmon habitat continues to decline. Four species of salmon in western Washington are listed as “threatened” under the Endangered Species Act, some for more than a decade.

Our considerable investment in habitat restoration has not been able to turn the powerful tide of loss and degradation. We are steadily losing habitat throughout the region, and that trend shows no sign of improvement.

The reason is not a lack of effort or a lack of desire to recover salmon. The reason is a lack of federal and state government leadership, policy, commitment and coordination toward a set of salmon recovery goals and objectives.

We know that we cannot stop the massive population growth anticipated in this region over the coming decades, but we can ensure that the associated development is designed and implemented in ways that will better protect salmon and its habitat.

Habitat loss and degradation are the biggest contributors to the decline of the salmon resource, yet the federal government's primary response is to restrict harvest. Tribes are required to prove that our fishing and hatchery plans will lead to increased salmon populations and will not harm ongoing wild salmon recovery efforts. But we have observed that those who damage and destroy salmon habitat aren't held to the same standard.

Instead, the U.S. government continues to approve federal actions and federally funded state actions that either do not contribute to, or actually impede recovery of salmon habitat. The result is the continued slow degradation of habitat that already has suffered from years of pollution, poor land use practices, and other factors. This situation sets the bar higher and higher for tribes to continue our way of life, while setting it lower and lower for those who would destroy the salmon's home. This uncoordinated approach solidifies habitat losses and ultimately fails to protect our huge investment of funding, time, and effort.

The federal government's over-reliance on restricting harvest as the primary means to protect salmon is unfair, ineffective, and contrary to established principles of Indian law. In the end, this policy undermines the recovery of salmon and other listed species in western Washington. Like harvest and hatchery operations, habitat quality and quantity must be calibrated across the spectrum of agencies and jurisdictions involved in salmon recovery.

Salmon recovery begins and ends with habitat. No amount of fishery restrictions can restore the resource unless salmon have good spawning and rearing habitat.

An example is the Nisqually River, with its headwaters in a national park and its mouth in a national wildlife refuge. It is one watershed in Puget Sound where we have made significant habitat gains in recent years. More than 85 percent of lower river estuary habitat has been reclaimed through cooperative federal, tribal, and state work to remove dikes; nearly 75 percent of mainstem river habitat is in permanent stewardship.

Despite this massive cooperative effort, research shows that young ESA-listed salmon and steelhead from the Nisqually River are dying before they can reach Seattle, just 30 miles away. The main cause is believed to be a lack of good nearshore habitat caused by ongoing development practices.

If salmon are to survive, we must begin to achieve real gains in habitat protection and restoration. The path we are on leads to the extinction of the salmon resource and our treaty-reserved rights.

The federal courts have recognized four basic values associated with the treaty-reserved rights of the tribes: (1) conservation value of the resource, (2) ceremonial, religious, and spiritual values, (3) subsistence, and (4) commercial value. The treaty right to fish is a property right of the tribes and is protected under the Fifth Amendment of the U.S. Constitution, our treaties and the U.S. Supreme Court affirmation of this right.

In failing to protect salmon habitat, the federal government is failing in its trust responsibility to honor its treaties with the tribes. We are left with few choices other than the courts to protect our treaty-reserved rights and the salmon that are so essential to our culture.

We are at a legal and biological crossroads in our efforts to recover the salmon and preserve our tribal cultures, subsistence, spirituality, and economies. Not since the darkest days of the fishing rights struggle before Judge Boldt's decision in *U.S. v. Washington* have we feared so deeply for the future of our treaty rights.

This document discusses specific federal government actions that are impeding salmon habitat recovery and restoration, including:

- The application of disparate standards to harvest and habitat.
- Failure to protect treaty rights and financial investments by fully implementing existing federal authority.
- A general lack of alignment by the federal government of its actions with salmon recovery efforts.

This document also recommends specific solutions that will help the federal government meet its trust responsibilities to the treaty Indian tribes in western Washington as we rebuild the salmon resource. Broadly, those actions encompass:

- An urgent call for the federal government to hold the degradation of habitat to the same standards applied to tribal harvest.
- A demand that federal government begin to protect treaty-reserved rights by better protecting habitat.
- Urging federal leadership to provide leadership and oversight to ensure alignment and harmonization of federal programs with salmon recovery efforts.

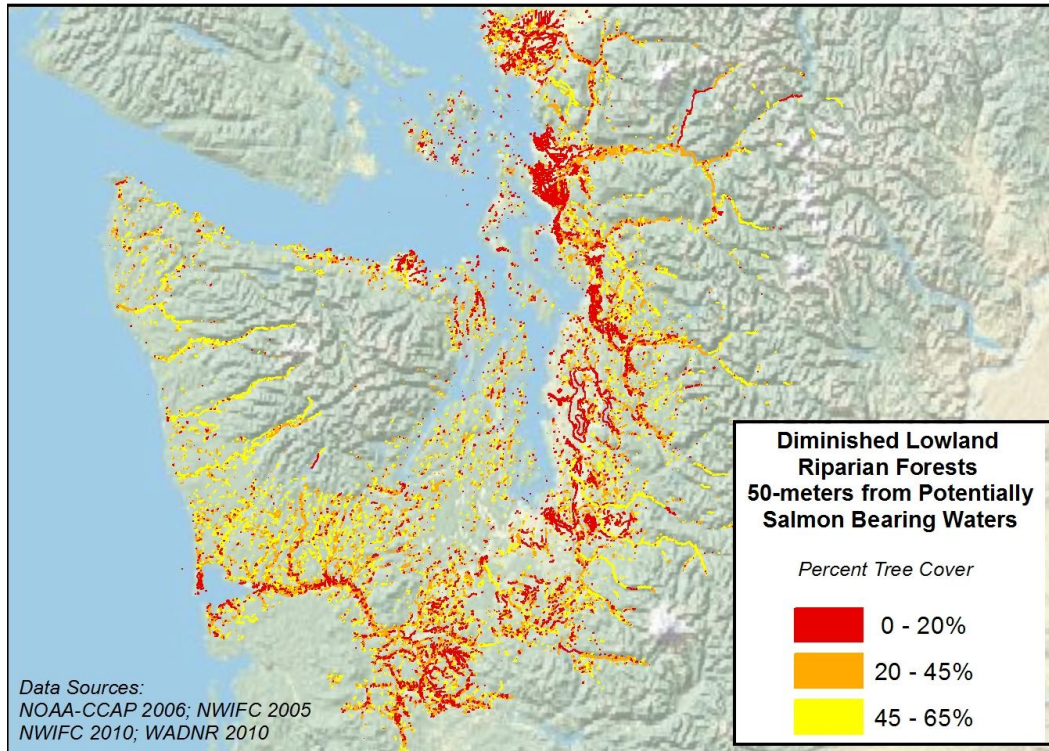
These actions are critical to reverse the trend toward extinction, and ultimately to recover salmon and restore treaty-reserved harvest rights.

Salmon Habitat Still Declining Despite Recovery Efforts

“We have worked for decades to restore habitat in the Elwha River system, and we are still not fishing on the salmon stocks we have been working to protect. We had to push for an act of Congress to remove two fish-blocking dams on the river, but the way it’s going now, we still may never be able to fish for chinook again.”

– RUSS HEPFER, LOWER ELWHA KLALLAM VICE CHAIRMAN

Diminished riparian forests in the lowlands of Western Washington continue to impair habitats critical to the recovery of the region’s anadromous salmon.



Wild salmon are naturally productive and have just a few basic needs for their survival: access to and from the sea, good spawning and rearing habitat, and the opportunity to reproduce.

Salmon harvest already has been eliminated to the point that further cuts can no longer contribute significantly to the recovery of wild salmon stocks. Yet habitat loss and degradation continue steadily destroying the salmon resource and along with it, the cultures and communities of the treaty Indian tribes in western Washington.

Protecting existing salmon habitat from further decline is the key to recovering endangered salmon populations. According to the 2007 Puget Sound Chinook

Salmon Recovery Plan adopted by NOAA Fisheries and developed by the state and tribal salmon co-managers, and numerous watershed entities:

Protecting existing habitat and the ecological processes that create it is *the most important action needed in the short term* to increase the certainty of achieving plan outcomes. Protection must occur in both urban and rural areas if we are to ensure the long-term persistence of salmon in Puget Sound.¹

In the final supplement to the recovery plan, NMFS concurs with the imperative of immediate habitat protection, stating that “protecting functioning habitat is one of the top priorities and first steps for achieving a viable ESU (evolutionarily significant unit).”²

However, despite ESA listing of Puget Sound chinook in 1999 and the subsequent call for enhanced protections of remaining habitat, NMFS’ 2010 assessment of the Puget Sound Chinook Salmon Recovery Plan declared:

- Habitat is still declining; and
- Habitat protection needs improvement.³

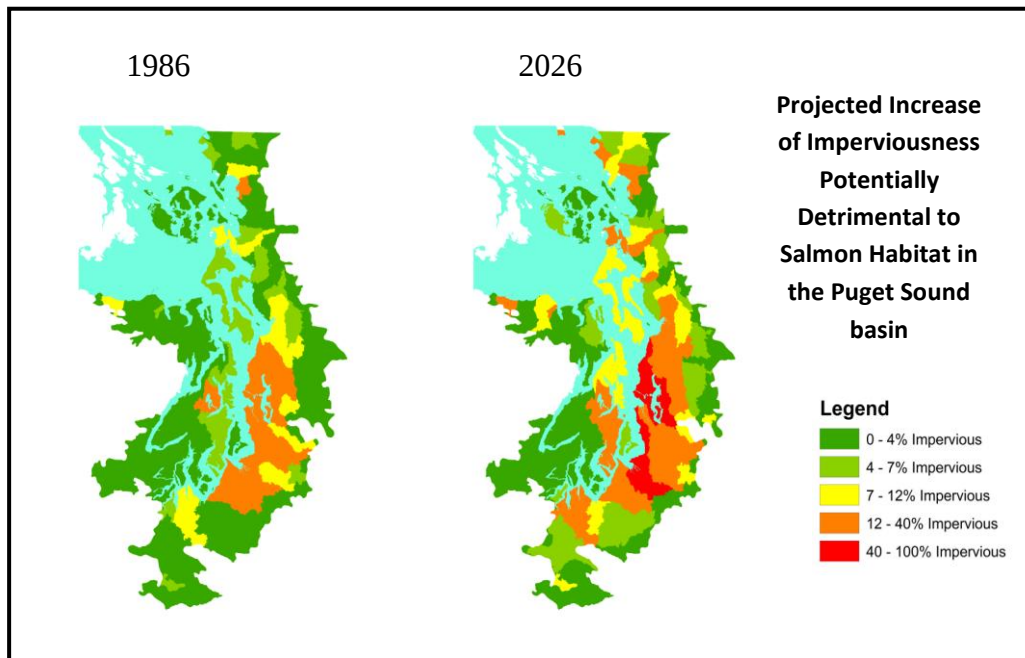
The status and trend data summarized in the NMFS report revealed extensive habitat losses across key indicators such as intertidal wetlands and forest cover. The report identified declining trends in habitat by comparing both historical data and trends since the ESA listing of Puget Sound chinook salmon.⁴ For example:

- After ESA listing, from 2001 to 2006, about 10,700 acres of forest and 4,300 acres of agricultural land were converted to impervious surfaces.⁵
- Washington has lost an estimated 70 percent of its estuarine wetlands, and 90 percent of its old-growth forest. Together, these native habitat types have been considered among the most diverse and productive in the state.⁶

Other studies and analyses echo the NMFS report findings. Key indicators of a declining trend in salmon habitat include:

- Since the ESA listing of Puget Sound fall chinook in 1999, loss of shoreline habitat and function through shoreline armoring continues at a rate of 1.5 miles per year.⁷
- 83 percent of waters sampled to compile the state’s 305(b) and 303(d) Clean Water Act lists violate state water quality standards and are polluted.⁸
- About half of critical low gradient riparian forest habitat has insufficient forest cover to support salmon.⁹

- A Puget Sound Nearshore Ecosystem Restoration Project study revealed dramatic losses of habitat in all but one place in the sound during the last 150 years.¹⁰
- Hood Canal is highly impaired by a lack of dissolved oxygen, and the resultant hypoxia causes fish kills.¹¹
- Eelgrass beds, essential to the intricate food web for salmon, are in overall decline.¹²



In a recent geographic information system (GIS) analysis of Puget Sound land cover data and population growth rates,¹³ existing and projected trends demonstrate dramatic increases in the conversion of vegetated areas to concrete. These increases in impervious surfaces impact salmon habitat by removing essential vegetation and biota, increasing runoff, conveying pollutants, and altering hydrology. Without appropriate planning, placement, and mitigation, these actions will continue to imperil salmon.

Trends at the watershed scale in western Washington also provide a bleak outlook:

- Within the Stillaguamish watershed, during the time period of 1996 through 2006, there was a decrease of 41 percent in forest cover within the Urban Growth Area and a 22 percent decrease of forest cover inside rural residential areas. Now, only 23 percent of the 1,777 acres of riparian area within the floodplain have any forest cover.¹⁴
- In the Hoh watershed, approximately 31 percent of private forestlands were harvested between 1998-2010 (post ESA listing).¹⁵
- In the Snohomish watershed, dikes, levees, and flow devices have resulted in the loss of 55 percent of critical mainstem salmon habitat.¹⁶
- In the Port Gamble S'Klallam Tribe's usual and accustomed grounds, places such as Port Gamble Bay have had 74 percent of the shoreline armored or modified.¹⁷
- In the Skokomish basin, the watershed has experienced a 51 percent increase in impervious surfaces, with a third of that paving occurring just one mile from Hood Canal.¹⁸
- In the Muckleshoot Indian Tribe's area of concern, NOAA models predict that more than half of the stream miles of known coho salmon habitat will experience pre-spawn mortality rates greater than the average, and that 141 of those miles will experience mortality rates greater than 35 percent, when under normal conditions these rates are generally less than 1 percent.¹⁹

Loss of Harvest and Catch Opportunity

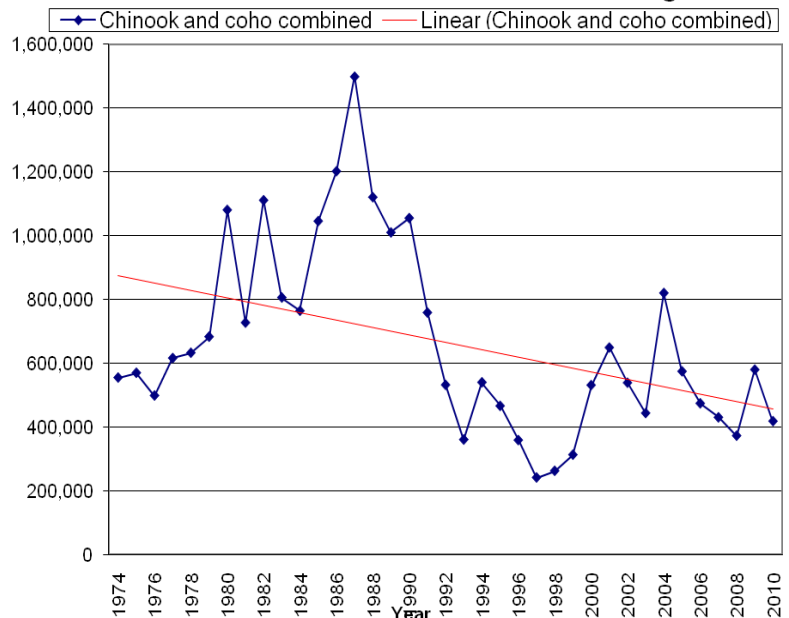
“We volunteered not to fish for chinook and to focus on the recovery of our salmon. But even with the nets out of the river, our fish numbers are not increasing. We work hard to restore habitat and recover Stillaguamish chinook, but in the meantime, our culture faces extinction. We are a living culture and we must have salmon to harvest.” –SHAWN YANITY, STILLAGUAMISH CHAIRMAN

Western Washington tribes pursued recognition of their treaty-reserved salmon fishing rights in *U.S. v. Washington* 384 F. Supp. 312 (1974) because their fisheries were being preempted by the state of Washington. The state was allowing its ocean and Puget Sound fisheries to overharvest returning adult chinook and coho salmon, but was denying the tribes’ treaty rights to fish in their traditional waters. Tribes were left with little or no fishing opportunity.

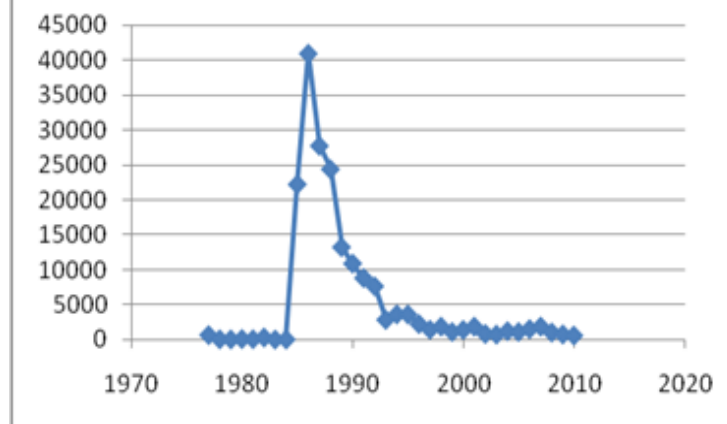
U.S. v. Washington – known as the Boldt decision – affirmed the tribes’ treaty fishing rights and established the tribes as co-managers of the resource with the right to half of the harvestable salmon returning to Washington waters.²⁰

The years following the 1974 ruling witnessed the growth of harvest opportunity and catch, as tribal fisheries accessed 50 percent of the harvestable run. A

Tribal Harvest in Western Washington



Tribal Steelhead Harvest in Puget Sound

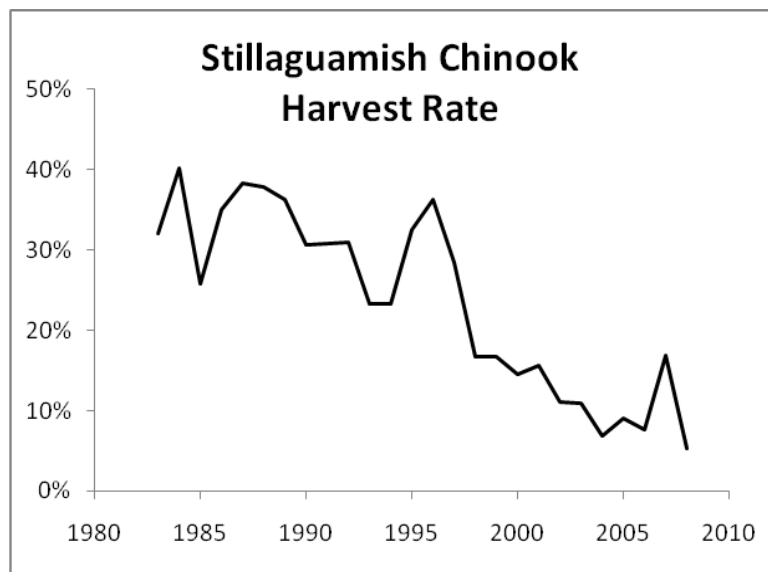


joint management framework developed by the state of Washington and the treaty tribes led to better balancing of harvest opportunity across all salmon fisheries.

Despite highly conservative fisheries and the prudent use of hatcheries, ongoing salmon habitat loss and degradation have led to pre-*U.S. v. Washington* tribal harvest levels. This habitat loss has continued even after the establishment of Puget Sound coho as a species of concern (1995), and the listing of Puget Sound chinook (1999) and steelhead (2007) as threatened under the Endangered Species Act.

For more than two decades, harvest rates in all fisheries have been sharply reduced to compensate for the precipitous decline of salmon abundance in Washington state waters, but today harvest cuts can no longer compensate for losses in salmon spawning and rearing habitat.²¹

Analysis of total U.S. harvest rates and run sizes for North Fork Stillaguamish River chinook illustrates this point. Washington harvest rates have been sharply and steadily reduced in reaction to declining returns. While this harvest action maintained spawning at targeted levels, it did not result in more fish returning to spawn, clearly indicating that factors other than harvest are responsible for the stock's decline.²²



As a result, the Stillaguamish Tribe's treaty-protected river fishery was effectively eliminated and with it, an essential element of tribal culture and source of traditional food. Although the action was not matched by other managers, the tribe gave up even its most basic treaty-reserved ceremonial and subsistence harvest for more than 25 years in an effort to ensure the conservation of this run. In recent years, the Stillaguamish people had to purchase fish from outside their river system to conduct the traditional first salmon ceremony that welcomes and honors the salmon that are the foundation of their culture.

Request for Federal Action

I. Stop the disparate treatment of Indian tribes when applying salmon conservation measures.

The Problem

Currently, NMFS holds the tribes to a different standard than all others by applying more stringent standards to tribal salmon harvest than to actions that degrade salmon habitat. NMFS requires salmon harvest to be managed to contribute to salmon recovery, but fails to apply a corresponding obligation to activities affecting salmon habitat. Similarly, NMFS claims that southern resident killer whales (orca) are not recovering because there are too few large chinook salmon for them to eat. But instead of addressing all activities that affect chinook abundance, NMFS looks only to harvest reductions to address the problem. The federal government continues to focus on restricting the tribes' treaty rights even though the science indicates that salmon will not recover or survive unless the government reduces the even greater take of salmon and orca caused by habitat loss and degradation. The federal government's disparate treatment contravenes its trust responsibility to the western Washington treaty Indian tribes and undermines accomplishment of federal fish and wildlife management objectives.

The Remedy

To eliminate these discriminatory practices, NMFS must hold habitat actions to no less a standard than harvest. Specifically, NMFS should be directed to:

- Apply at least as stringent a conservation standard to actions affecting salmon habitat as is applied to salmon harvest.²³
- Ensure that all federal actions affecting habitat contribute to recovery of salmon and orca.
- Develop a comprehensive and timely plan for addressing orca prey consumption needs that does not result in disparate treatment of treaty fishing.
- In areas where NMFS has declined to designate critical habitat, adopt commensurate harvest management policies.

How the federal government is failing in its trust responsibility:

NMFS applies disparate standards under the ESA, by treating harvest management requirements differently than habitat management requirements.

The Endangered Species Act (ESA) created a responsibility for federal actions affecting listed species to provide an adequate potential for recovery, not just maintain the degraded status quo. For example, as a consequence of the Ninth Circuit's decision in *NWF v. NMFS*,²⁴ the federal operating agencies and NMFS now recognize that the dams comprising the Federal Columbia River Power System are obligated to contribute to the recovery of salmon. In response to the decision, NMFS and the federal action agencies (in consultation with state and tribal co-managers) assessed the proposed operation of the dams and determined that it would jeopardize ESA-listed salmon. They also determined what improvements were necessary to assure salmon survival and "provide an adequate potential for recovery." Generally, any level of population growth greater than 1 to 1 replacement meets NMFS' interpretation of providing an adequate potential for recovery with respect to the Columbia River dams.²⁵ While there are differences of opinion among states, tribes, and federal agencies as to whether this interpretation adequately addresses recovery, no one questions that there is a recovery obligation on the Columbia River.

The western Washington treaty tribes' harvest plans are designed to contribute to recovery. NMFS has developed an elaborate procedure for determining whether the impacts of tribal harvest will interfere with recovery of Puget Sound chinook. This includes modeling the likely effects of harvest on 22 individual populations that make up the Puget Sound chinook evolutionarily significant unit (ESU). This analysis looks at the current productivity of existing habitat and assesses the likelihood of a given population falling below a certain critical level or rising above a rebuilding level. Using this approach, harvest is managed to assure both survival *and* eventual recovery.²⁶

In analyzing the tribes' harvest plan, NMFS also has stated that poor habitat productivity, not harvest, is the factor preventing chinook rebuilding in river systems such as the Nooksack, Puyallup, Sammamish, Skokomish, Dungeness, and Stillaguamish.²⁷ NMFS' own federal assessment of recovery plan implementation states that harvest has been managed consistently with this obligation to support recovery, while habitat continues to be the limiting factor to recovery.²⁸

In stark contrast to the standards applied to the harvest of listed salmon, NMFS' review of the Federal Emergency Management Agency (FEMA) floodplain insurance program does not address Puget Sound salmon recovery. Instead NMFS applies a no net loss standard that attempts, at best, to maintain existing degraded

habitat conditions. In September 2008, NMFS determined that the continued implementation of the National Flood Insurance Program in Puget Sound (and the land use practices that go along with it) jeopardizes the continued existence of chinook, steelhead, summer chum, and orca. FEMA's flood insurance program subsidizes the alteration and destruction of salmon habitat by providing inexpensive insurance coverage for property and structures that are built in the floodplain.²⁹ As required by the ESA when it finds jeopardy, NMFS designed a "reasonable and prudent alternative" (RPA) as part of its biological opinion (BiOp), to allow the flood insurance program to go forward. NMFS' RPA is intended explicitly to result in no net loss of floodplain habitat and no adverse impact to "protected areas" (riparian areas, floodways, and channel migration zones).³⁰ In other words, NMFS' RPA is intended to maintain current degraded habitat conditions.

In crafting its RPA, NMFS did not identify management practices intended to address the gap between current productivity of salmon habitat, and what is needed to provide an "adequate potential for recovery," as it did in the Columbia basin. In contrast, NMFS' analysis of the tribes' Chinook Harvest Plan includes harvest rate ceilings which insure that populations will achieve escapement levels consistent with rebuilding abundance, as needed to foster recovery.³¹ Essentially, NMFS fails to apply the same escapement and rebuilding levels required of tribes to its habitat protection decision in the FEMA BiOp.

The problem gets worse. Whereas the RPA calls for no adverse impacts in floodways, channel migration zones, and riparian areas, FEMA's response promises more habitat degradation and allows for local governments to permit development in these areas, with mitigation. NMFS is supporting this response.³² However, the initial failure of mitigation to alleviate the impacts of development in these areas is one of the reasons why treaty rights aren't being met and salmon became subject to the ESA.³³ Moreover, this is bad flood policy because this development impairs watershed flood capacity and exacerbates flood damages.

Along with allowing more habitat degradation, FEMA and NMFS are delegating to local governments the responsibility for deciding what riparian/floodplain salmon habitat still retains value and what habitat can be written off as undeserving of protection.³⁴ The federal agencies provide no watershed and salmon population context for how these decisions ought to be made. Nor do NMFS and FEMA explain how writing off salmon habitat is consistent with their obligations to support salmon (and orca) recovery and comply with treaty rights. Moreover, local governments have neither the expertise nor the interest in meeting these obligations.

Despite NMFS' findings regarding the crucial need for increased habitat quantity and productivity to reverse declining population trends, the FEMA BiOp and RPA lack specific provisions for improving habitat to assure the survival and eventual

recovery of these populations. By failing to hold FEMA's flood insurance program to the same standard that it holds harvest, NMFS both applies disparate treatment of treaty harvest and fails to apply conservation measures necessary to assure the survival and recovery of salmon (and the orca that depend on them). If Columbia River dams and Puget Sound treaty fisheries had been managed this way, ESA compliance could have been achieved by simply freezing salmon mortality levels to those occurring at the time salmon were listed. Obviously, this has not occurred.³⁵ To the contrary, exercise of treaty rights has been restricted and millions of dollars have been spent changing both the configuration and the operation of the dams, as needed to assure an adequate potential for recovery.

In "protecting" orca, NMFS focuses on chinook harvest while ignoring other more damaging impacts.

Southern resident killer whales (orca) were listed as "endangered" under the ESA in November 2005. Prior to December 2010, NMFS indicated that harvest did not significantly affect the availability of prey for orca. Since then, NMFS has gathered additional information regarding orca prey requirements, and concluded that further reduction of chinook harvest may be necessary for orca recovery.

The treaty tribes and states of Alaska and Washington have significant concerns regarding the quality of the new data and the assumptions underlying NMFS' analysis. However, should the data withstand rigorous scientific review, they underscore the need to protect and increase overall chinook abundance, not simply reallocate harvest from humans to orcas. Unfortunately, NMFS's current focus on the reallocation of harvest does not address important factors causing orcas' decline, including toxic contaminants, vessel disturbance, noise, and the continued loss and fragmentation of salmon spawning and rearing habitat.

NMFS, in cooperation with the Canadian Department of Fisheries and Oceans, is convening an expert panel and a series of workshops to evaluate the effects of salmon fisheries on orca. The workshops are being focused narrowly on just one factor that affects chinook abundance – harvest. They will not address key factors such as habitat, even though habitat decline is the critical factor limiting chinook abundance.³⁶ NMFS has declared that it will start identifying alternative harvest regimes in response to the workshop before the process is even complete. Essentially, NMFS is proposing to preempt their scientific process by acting on conclusions yet to be established. By any standard, this is not an objective approach.

If prey availability (i.e. chinook abundance) is an important problem affecting orca, then the federal government needs to address all the key factors. Other actions and policies affecting chinook abundance include land management, such as FEMA's National Flood Insurance Program, pesticide management, evaluation of Puget Sound hatchery programs, and NMFS' recently issued "Population Recovery Approach."

For example, NMFS is consulting with the EPA about the impacts of a number of pesticides on ESA-listed salmon. Despite the evidence that orca are harmed by the toxic chemicals in the fish they eat³⁷, NMFS has yet to assess the impacts on orca from ingesting chinook exposed to pesticides and other toxic compounds. Given NMFS' findings that several of these chemicals pose jeopardy to Puget Sound chinook,³⁸ it would logically follow that NMFS should promptly assess the effects of these pesticides on orca, prior to altering harvest regimes and impacting treaty rights. However, NMFS continues to focus on harvest and ignore the impacts of pesticides on chinook, orca, and the tribes' treaty rights, even though action on toxic chemicals would provide benefits for chinook and orca, as well as improve the overall health of Puget Sound and all the people that reside within the region.

In the case of FEMA's flood insurance program, NMFS found that the program jeopardizes both chinook and orca. Since that 2008 finding was made, NMFS has modified its views regarding orca consumption of chinook. As a result, the impacts stemming from the flood insurance program pose even greater jeopardy to orca. Despite this, NMFS maintains its position that the flood insurance program is obligated only to preserve existing habitat conditions. Worse yet, as discussed above, FEMA's plan allows continued degradation of salmon habitat even though NMFS insists that more chinook are necessary for orca to survive and recover.

Again, the federal government imposes one standard on the treaty tribes and a less stringent standard on activities that jeopardize salmon. As a consequence, treaty rights are impaired and the species these rights depend upon will not recover. The federal government needs to address *all* the sources of the problem in a manner that is consistent with the salmon conservation necessity principles established in treaty case law.³⁹

Request for Federal Action

II. Protect and restore western Washington treaty rights by better protecting habitat.

The Problem

Although the federal government makes significant investments in restoring degraded habitat, it does not fully exercise its authority to protect the essential habitat that remains. Without these protections, overall habitat will continue to decline. This progressive habitat degradation will make recovery impossible and threatens the ability of tribes to protect, restore and exercise their treaty-reserved rights to fish.

The lack of habitat protection does not stem from an absence of authority – it is caused by the federal agencies’ inability to align environmental and conservation programs with recovery efforts, and to effectively implement and enforce existing laws. For example, federal funding from a number of agencies continues to support state environmental and conservation programs that are inconsistent with salmon recovery and do not achieve compliance with state water quality standards. Moreover, federal agencies have not enforced key environmental statutes such as the ESA, which could serve to protect salmon habitat.

The Remedy

Protecting salmon habitat is an essential element of the fiduciary duty to ensure that the tribes can exercise treaty-reserved rights. In implementing this duty, the federal government must employ *all* authorities and tools to leverage better habitat protection. Specifically, we ask the Administration to:

- Require federal funding supporting state programs and pass-through grants to be conditioned so that all funded efforts achieve consistency with state water quality standards and salmon recovery plan habitat objectives. Examples include:
 - Clean Water Act funds, National Estuary Program funds and Coastal Zone Management Act funds should implement actions designed to achieve state water quality standards, total maximum daily loads (TMDLs), and salmon recovery plan habitat objectives.
 - USDA funds, including Farm Service Agency (FSA) and National Resource Conservation Services (NRCS) programs should implement riparian buffers comparable to those that NMFS has called for in its RPA for FEMA’s National Flood Insurance

Program, and implement all other practices consistent with TMDLs, water quality standards, and salmon recovery objectives.

- Direct federal agencies to increase enforcement of their obligations to protect habitat, including the Endangered Species Act and Clean Water Act.
- Direct NOAA and EPA to ensure that state shoreline master program updates are consistent with all federal obligations, including treaty rights.
- Direct the Department of Justice to initiate limited water rights adjudication to identify treaty-reserved rights for instream flows in selected watersheds.

How the federal government is failing in its trust responsibility:

Habitat continues to decline despite investments in habitat enhancement.

Salmon recovery is based on the crucial premise that we can protect what habitat remains while we restore degraded habitat conditions. In the effort to restore salmon, many millions have been spent to protect and restore salmon habitat:

- The Salmon Funding Recovery Board has administered approximately **\$788 million** in federal, state, and local funds since 1999.⁴⁰
- The USDA's Farm Service Agency Conservation Reserve and Enhancement Program – developed to rebuild salmon habitat on agricultural lands – has allocated approximately **\$71 million** since 1998 (80 percent is federal).⁴¹
- Since 1987, the Department of Ecology has administered approximately **\$60 million** in federal clean water funds to protect beneficial uses – namely salmon.⁴²

Unfortunately, these and other significant investments in recovery may not be realized because the rate of habitat loss continues to outpace restoration.⁴³ This decline can be attributed to the fact that current habitat protection is contingent upon the same programs that existed prior to the ESA listing of Puget Sound salmon. Moreover, since ESA listing, these programs have yet to be recalibrated to protect salmon habitat. The result, as the NMFS report explains, is that the current habitat protection system is based on the very same programs that failed to prevent ESA listing.⁴⁴ Nonetheless, many of these outmoded tools continue to be funded by federal dollars and authorized by federal agencies without conditions to require recalibration and alignment with recovery objectives.

The federal government approves funding for state programs that should protect salmon habitat, but do not.

The federal government financially supports the development and implementation of Washington's Shoreline Management Act (SMA), because it is the cornerstone of the state's Coastal Zone Management Program (CZMP).⁴⁵ As a result, extensive coastal zone management funds have been given to local governments to develop local plans for their shorelines, and to the state government to subsequently approve them. Since these programs relate to the shorelines, they also govern a large portion of critical salmon habitat.

The SMA was adopted prior to the ESA listing of salmon and has never been calibrated to protect the species, habitat, or the financial investments to rebuild habitat. In fact, in some instances, the SMA has been used to undermine it. For example, Washington state's highest court struck down the City of Bainbridge Island's moratorium on shoreline development, passed in part to prevent potential impacts to endangered salmon.⁴⁶ The court rejected the city's protective efforts because its moratorium prohibited what the SMA permits – shoreline development for single family residences, including bulkheads, and docks.⁴⁷

Essentially, although the SMA is funded under the guise of coastal protection, it does not serve to protect coastal species such as ESA-listed chinook salmon and its habitat. In fact, as determined by the programmatic biological assessment for the Shoreline Master Program Guidelines:

Many project types specifically regulated by *and allowed* under the guidelines are likely to adversely affect proposed critical habitat for Puget Sound chinook salmon.⁴⁸

Another problem with the federally funded SMA program is that it employs a standard that is neither quantifiable nor specific enough to provide concrete performance standards to protect salmon habitat. For example, development of new SMA rules, which amended the state's CZMP, prompted NMFS to declare that the rules were so broad that they could not assess the effects of the rules on salmon.⁴⁹ Moreover, even the implementing state agency agreed that the SMA contains an incalculable performance standard, which the state then defers to local governments to quantify.⁵⁰

The nationwide permit system is streamlining habitat modification and inhibiting treaty rights.

The U.S. Army Corps of Engineers is responsible for permitting actions that discharge dredge and fill material into waters of the state. These actions commonly include shoreline armoring, stream modifications, and the attending maintenance of those structures. The Corps' nationwide permit process provides a streamlined system for this work. In the Seattle District, approximately 1,000 permits are obtained each year.⁵¹ The resulting cumulative armoring of waterways is a key cause for Puget Sound decline and habitat loss, in part because it affects nearshore fish abundance, distribution, and behavior patterns.⁵² Ironically, the Corps' streamlined system helps build the very structures in which we are investing federal funds to remove as part of habitat improvement projects.

State policies are not protecting instream flows necessary for salmon, and federal protection is needed.

For more than four decades, the western Washington treaty Indian tribes have pursued a number of administrative, cooperative, voluntary, and inter-governmental approaches to define and establish the instream flows necessary to protect and restore salmon resources. Unfortunately, each of these efforts has failed to institute a comprehensive effort to establish instream flows to protect and restore fish habitat consistent with the treaty-reserved rights of the tribes.

Tribes are left with few options, because of a combination of the state-based priority date for instream flows (which is junior to most appropriations); municipal water purveyors' ability to dewater streams; the state's broad use of a vague "public interest" exception to override habitat protection; and the unwillingness of the state to enforce its own laws or control the cumulative impacts from permit-exempt wells. Based on the policies of state law, it will be impossible to truly restore or, at best, protect instream flows. The federal government needs to aggressively secure the protection of tribal rights to instream flows and resources through initiation of litigation or limited adjudications.

Enforcement is necessary to implement salmon recovery, yet federal agencies fail to take action.

On July 10, 2000, NMFS published its take guidance for Puget Sound. It listed a range of activities most likely to cause harm to endangered salmon habitat, which therefore violate the ESA. Implementing this guidance is critical to supporting salmon recovery. There appears to be only one instance of NMFS exercising its enforcement authority over these activities during the past decade.⁵³ Aside from this anomaly, we know of no further instances of NMFS exercising its enforcement authority to protect habitat.

The first item on NMFS' list of harmful activities is constructing or maintaining barriers to fish passage, e.g., fish-blocking culverts.⁵⁴ The Washington Department of Fish and Wildlife recently disclosed that 30 percent of randomly sampled culverts, despite receiving a state permit in the last 10 years, still resulted in blocked fish passage.⁵⁵ A state report also noted that increased regulatory presence and subsequent enforcement were necessary to ensure that landowners complied with the ESA. However, NMFS has not instituted ESA enforcement to help remedy this.

Another example of an action known to harm salmon is shoreline armoring. Washington's Shoreline Management Act provides an exemption from state regulation for shoreline homeowners who armor their shoreline.⁵⁶ Between 2004 and 2008 alone, the Washington Department of Fish and Wildlife granted 456 permits for new bulkheads in Puget Sound. This doesn't include replacement of old bulkheads.⁵⁷ However, NMFS has not used its authority to address any of these harmful habitat modifications.

Request for Federal Action

III. Establish federal oversight and coordination to align environmental and conservation programs to achieve salmon recovery and protect treaty-reserved rights.

The Problem

The federal government has a fiduciary responsibility to exercise its authority so that the tribes receive the benefit of the rights they reserved in their treaties. In western Washington, the government's fiduciary responsibility includes the protection and restoration of salmon and the habitat needed to ensure their survival and recovery. However, the process of salmon recovery crosses many jurisdictions, and there is a lack of leadership to ensure that programs are implemented consistently across those jurisdictional lines. This piecemeal approach to recovery has resulted in a lack of agency consistency and the implementation of federal programs that serve neither to recover salmon nor protect treaty rights. For example, NMFS threatens significant changes in approaches to salmon harvest because of orca concerns. However, EPA and NOAA remain complacent about the state of Washington's 17 years of non-compliance with the Coastal Zone Management Act – a key salmon and orca recovery component. In the meantime, federally funded salmon restoration actions are undermined by state and federal permitting processes that degrade salmon habitat.

The Remedy

The tribes seek stronger federal leadership to oversee the salmon recovery process and ensure successful implementation of recovery actions across jurisdictional lines. This leadership must serve to:

- Align funding programs to ensure achievement of recovery objectives.
- Unify federal agencies and resolve inter-agency conflicts to support salmon recovery.
- Hold federal agencies accountable for acts or omissions that lead to disparate treatment of treaty tribes or failing to protect treaty-reserved rights.
- Harmonize federal actions to ensure consistency and compliance with federal obligations and treaty rights.

How the federal government is failing in its trust responsibility:

Federal funding lacks alignment with salmon recovery efforts.

Many state and federal grant programs, while intending to make improvements, lack mechanisms to ensure that projects are consistent with recovery and protect treaty-reserved rights. For example, water temperature is a limiting factor for salmon survival, and many western Washington watersheds are temperature-impaired. To address this type of water pollution, the state, with significant federal funding, follows the federal Clean Water Act process and develops temperature total maximum daily loads, or TMDLs. Temperature TMDLs develop site-specific prescriptions to reduce stream temperatures, which ultimately are approved by EPA.

However, there are no assurances or accountability mechanisms that ensure that these pollution control prescriptions get implemented through relevant federal programs. For example, despite the fact that grants are the only tool used to implement TMDLs, neither the state nor EPA require that grant recipients actually follow the specific requirements of the TMDL. Instead, in an effort to provide assurances of implementation efficacy, the state requires riparian buffers be a mere 35 feet wide, which under most circumstances does not satisfy the requirements of their own TMDLs,⁵⁸ let alone the needs of salmon.⁵⁹

Other state and federal conservation programs, such as the Natural Resources Conservation Service and Washington State Conservation Commission grants, also do not require their grant programs to implement these Clean Water Act prescriptions. Instead those programs rely on a planning process that ultimately lets the landowner decide what is best for salmon and water quality, even if those choices are contrary to federally approved TMDLs or salmon recovery plans.

Federal funding is not conditioned to ensure protection of treaty rights.

The tribes have called for state and federal action to better prevent pervasive pollution problems impacting treaty-reserved rights,⁶⁰ with little response or change. However, when non-Indian commercial shellfish interests recently cried for relief from fecal pollution problems, the EPA promptly provided \$1 million to a local county for a pollution identification and correction program.

Unfortunately, the granting of funds did not include conditions that required the program to be consistent with water quality standards. After funds were turned over to the county, a governor-led inquiry into the process revealed that even the most basic of pollution controls, such as keeping cows out of streams, were not implemented.⁶¹ Despite the EPA funding, a recent downgrading of 4,000 acres of shellfish beds occurred in this area, impairing treaty-reserved rights and prompting the governor to declare the overall effort a “failure.”⁶²

Federal approval of coastal protection plans has been unlawfully delayed for 17 years.

The Coastal Zone Act Reauthorization Amendments (CZARA), a component of the Coastal Zone Management Act, requires coastal states to develop and implement nonpoint pollution control programs that “restore and protect coastal waters.”⁶³ To receive approval, a state program must meet both statutory and administrative criteria. If a state fails to submit an approvable program, up to 30 percent of coastal management assistance and 30 percent of the Clean Water Act nonpoint source pollution funding is to be withheld.

These programs were supposed to be developed by 1995, but 17 years later, the federal agencies have failed to approve the state’s program. Final approval was withheld because of numerous deficiencies in the state’s program, including a lack of communication between the involved agencies.⁶⁴

With ESA listing of salmon and orca, the need for coastal protection is now more pressing than ever. Nonetheless, NOAA and EPA continue their complacency with the state’s noncompliance, and have failed to rescind funding in accordance with the law. In Oregon, this institutional lethargy resulted in a recent lawsuit filed against NOAA and EPA to compel final agency action under the Administrative Procedure Act. The subsequent settlement ought to result in enforcement of TMDLs along the Oregon coast. Given the critical importance of protecting habitat, it is essential that leadership is exercised to ensure that basic federal obligations in Washington are met, and in a way that better protects salmon and treaty rights.

Leadership and oversight are needed to align salmon protection programs.

The tribes have worked hard to foster salmon recovery while other federally supported programs undermine this progress. Examples include:

- The federal government significantly invests in habitat enhancement, while federally supported programs such as the state Shoreline Management Act and Corps of Engineers permitting processes continue to degrade habitat.
- NMFS requires tribal harvest to foster salmon and orca recovery, while FEMA is allowed to administer its flood insurance program in a manner that results in continued degradation of salmon habitat and fewer orca.
- The federal government prepares to alter treaty harvest requirements because of orca prey needs, but continues a 17-year streak of not

pressuring the state to finalize its coastal nonpoint pollution plan – a key salmon and orca recovery component.

- Funding secured for conservation and environmental protections are handed out without basic conditions and assurances to require that those actions be consistent with recovery efforts.

Leadership and oversight of salmon recovery is critical to ensure that the myriad federal programs relied upon to implement salmon recovery are in fact working together to accomplish this fundamental goal. Federal leadership must be provided to synchronize actions and ensure protection of the tribes' treaty-reserved rights.

Afterword

This paper is an immediate request for action. Faced with waning salmon populations and declining habitat, the tribes fear for the loss of their cultures and treaty rights. For the tribes, fish and fishing are as essential to life as water and air.

Our requests are simple: Stop the disparate treatment of tribes. Start protecting our treaty rights. Provide leadership to ensure that this is done.

We ask you to act now, before it is too late for the salmon and the treaty Indian tribes in western Washington.

For More Information:

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¹ Puget Sound Chinook Salmon Recovery Plan at p. 354

² NFMS Northwest Region, Final Supplement to the Shared Strategy's Puget Sound Salmon Recovery Plan, November 17, 2006.

³ NMFS, Puget Sound Chinook Salmon Recovery Plan – 2011 Implementation Status Assessment Final Report, 2011, at p. 6.

⁴ Id at 20.

⁵ Id at 15

⁶ NMFS, Puget Sound Chinook Salmon Recovery Plan – 2011 Implementation Status Assessment Final Report, 2011, at 6.

⁷ Carman, Taylor, and Skowlund, 2010, Regulating Shoreline Armoring in Puget Sound, in Shipman, Dethier, Gelfenbaum, Fresh and Dinicola eds, 2010 Puget Sound Shorelines and the impacts of Armoring – proceedings of a state of the science workshop, May 2009: U.S. Geological Survey Scientific Investigations Report 2010-5254. P. 49-54.

⁸ SSHIAP analysis of Washington's 2008 Water Quality Assessment Data.

⁹ SSHIAP analysis of data sources: *NOAA-CCAP 2006; NWIFC 2005; NWIFC 2010; WADNR 2010* . Conservatively, riparian forest cover with less than 65% cover has been determined to be insufficient for anadromous salmon and corroborated. However, NOAA has indicated in guidance that 80% cover was properly functioning, and <70% as not functioning. See National Oceanic and Atmospheric Administration, Coastal Salmon Conservation: Working Guidance for Comprehensive Salmon Restoration Initiatives on the Pacific Coast. Washington, D.C., (1996).

¹⁰ Puget Sound Partnership, State of the Sound Report, Ecosystem Status and Trends at pp 80-82 (2009).

¹¹ Further information about Hood canal D.O. is available at <http://www.hoodcanal.washington.edu/>

¹² Further information is available in the annual monitoring report: http://www.dnr.wa.gov/ResearchScience/Topics/AquaticHabitats/Pages/aqr_nrsh_eelgrass_monitoring.aspx

¹³ The following datasets were used to generate the Impervious Surface analysis and forecast for the Puget Sound region: Washington State Department of Natural Resources (DNR) Watershed Administrative Unit (WAU); NOAA CCAP. Coastal Change Analysis Project: Washington State Impervious Surface Polygons 1986 and 2006. NOAA Coastal Services Center. Charleston, S.C.; WA OFM. 2007. Projections of the Total Resident Population for the Growth Management Act (2000 to 2030, Low to High) Washington State Office of Financial Management. Olympia, WA; WA OFM. 2010. April 1 Population Determinations Official Change from April 1, 2000 to April 1, 2010. Washington State Office of Financial Management. Olympia, WA. WA OFM. 2011. WA OFM web site search to determine 1986 population by county. Using ArcGIS Desktop 9.3.1 Zonal Mean

function, the mean impervious surface value was calculated for each WAU draining to Puget Sound for both the 1986 and 2006 years. The 1986 and 2006 population totals were calculated for the counties containing the WAUs. The 2026 low, medium and high population estimates were also totaled for the same counties. Change values were calculated for population (2006-1986 & 2026 forecast - 2006) and impervious surface (2006-1986). A ratio analysis was performed comparing the change in population to the change in impervious surface to forecast the 2026 impervious surface change. The regional percentage increase in impervious surface was calculated for each WAU to generate the final thematic map using OFM's "High" 2026 county population estimate. The impervious surface categories are based upon the analysis by Tyson Waldo in the 2010/2011 Tulalip State of the Watershed report.

¹⁴ SSHIAP, State of Our Watersheds Report - Principle Findings, 2011, p. 1.

¹⁵ Id at p. 1

¹⁶ Haas, A and Collins B., A Historical Analysis of Habitat Alterations in the Snohomish River Valley, Washington since the Mid-19th Century: Implications for Chinook and Coho Salmon. Report Funded by the Tulalip Tribes with some additional funding from Snohomish County, 2001.

¹⁷ SSHIAP, State of Our Watersheds Report - Principle Findings, 2011, p. 3.

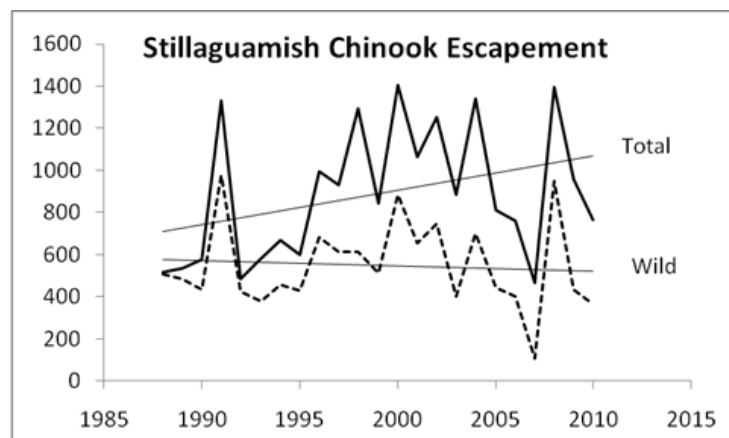
¹⁸ Id. at p. 4.

¹⁹ Id at 5.

²⁰ The Boldt decision was largely affirmed by the United States Supreme Court in *Washington V. Fishing Vessel Assn.*, 443 U.S. 658 (1979)

²¹ Harvest Rates and Graphs in this section are based upon the following: NWIFC, Analysis of Harvest Data from Tribal Online Catch Accounting System (TOCAS), 2011

²² Despite dramatic reduction in the harvest rate of Stillaguamish Chinook, which has resulted in an increasing trend in the total number of spawners (escapement), the number of wild fish returning has not increased. Wild productivity is constrained by degraded habitat.



²³ To the extent that conservation-based restrictions on treaty fisheries are necessary, these are governed by the conservation necessity principles established in federal case law and reflected in Secretarial Order 3206.

²⁴ See *National Wildlife Federation v. NMFS*, 524 F.3d 917, 931 (9th Cir. 2008) (amended opinion) where the court held that NMFS read the species recovery requirement out of the ESA.

²⁵ See NMFS, Supplemental Comprehensive Analysis (May 5, 2008) at 7-5.

²⁶ See NMFS, Proposed Evaluation and Determination on Chinook Plan (12/14/10) (E&D) at 38-39.

²⁷ *Id.* at 69.

²⁸ See NMFS, Puget Sound Chinook Salmon Recovery Plan – 2011 Implementation Status Assessment Final Report, 2011, at 45 (Harvest plans have been implemented as anticipated. Harvest being managed to meet or exceed established thresholds); see *id.* at 43 (Habitat quality continuing to decline. Current habitat protection tools generally the same as those that failed to forestall ESA listing).

²⁹ See NMFS, ESA Section 7 Consultation Final Biological Opinion: Implementation of the National Flood Insurance Program in the State of Washington, Phase One Document – Puget Sound Region, NMFS Tracking No. 2006-00472) (September 22, 2008) at 3. See also *National Wildlife Federation v. FEMA*, 345 F. Supp. 2d 1151, 1163-65 (W.D. Wash. 2004).

³⁰ See NMFS, ESA Section 7 Consultation Final Biological Opinion: Implementation of the National Flood Insurance Program in the State of Washington, Phase One Document – Puget Sound Region, NMFS Tracking No. 2006-00472) (September 22, 2008) Appendix 4 at 222-223.

³¹ NMFS requires that harvest management contribute to recovery by assuring that sufficient escapement occurs to make optimal use of current habitat conditions. Further harvest constraint, to produce higher escapement, would not result in higher productivity beyond the capacity of habitat. In concluding this is sufficient constraint of harvest NMFS, has stated that rebuilding to higher abundance, en route to recovery goals, is contingent on alleviating the habitat constraints, but federal consultations on actions affecting habitat are failing to require that habitat conditions improve.

³² Public statements by NMFS staff at May 2, 2011 workshop instructing local governments how to comply with the RPA and flood insurance requirements. See also Letter from Dan Siemann, National Wildlife Federation, to Will Stelle, NMFS, and Ken Murphy, FEMA (May 17, 2011).

³³ As recently conceded by the Washington Department of Ecology: “Estimates of mitigation success vary, but local, regional, and national studies show that most mitigation projects fail to fully achieve their intended goals and are not effectively replacing lost or damaged resources, habitats, and functions. We are not even close to achieving the goal of no net loss for wetlands and other aquatic habitats.” See WDOE, Making Mitigation Work: Report of the Mitigation that Works Forum (December 2008) at 1. This report is available at: www.ecy.wa.gov/biblio/0806018.html

³⁴ FEMA’s Model Ordinance, and apparently NMFS’ interpretation of its RPA, allows local governments to decide (regardless of expertise): (a) whether a given piece of floodplain or riparian habitat retains any fish habitat functions (See FEMA Revised Model Ordinance at 46 (commentary)); (b) whether a proposed action may affect any of these habitat functions (*Id.* at 52, §7.7(d)); and (c) how those impacts should be mitigated (*Id.* at 52-53, §7.8).

³⁵ While it is not yet fully recognized in the land management realm, harvest managers have long understood that they have a duty to manage salmon as needed to perpetuate harvestable runs. *See e.g., Washington v. Washington State Commercial Passenger Fishing Vessel Ass’n*, 443 U.S. 658, 684 (1979).

³⁶ See NMFS, Puget Sound Chinook Salmon Recovery Plan – 2011 Implementation Status Assessment Final Report, 2011

³⁷ See NMFS, Recovery Plan for Southern Resident Killer Whales (Orca) (2008) at II-87-96.

³⁸ *See e.g.*, NMFS, ESA Section 7 Biological Opinion on the Effects of EPA Registration of Pesticides Containing Carbaryl, Carbofuran, and Methomyl (April 20, 2009) (finding that registration of such pesticides would result in both jeopardy and adverse habitat modification to Puget Sound Chinook); *see also* NMFS, DRAFT ESA Section 7 Biological Opinion on the Effects of EPA Registration of Pesticides Containing 2,4-D, Triclopyr BEE, Diuron, Linuron, Captan, and Chlorothalonil (May 2011 DRAFT) (finding that registration of pesticides containing 2,4-D jeopardizes Puget Sound Chinook and that adverse modification of habitat results from use of pesticides containing diuron, and chlorothalonil).

³⁹ The Departments of the Interior and Commerce have some familiarity with the conservation necessity principles. They are referenced in Principle 3 of Department of the Interior Secretarial Order 3206, American Indian Tribal Rights, Federal-Tribal Trust Responsibilities, and the Endangered Species Act (June 5, 1997).

⁴⁰ Governors Salmon Recovery Office, State of Salmon in the Watersheds Report, 2010, at p. 20.

⁴¹ Based upon correspondence with Washington State’s CREP coordinator

⁴² Based upon correspondence with Department of Ecology’s nonpoint source pollution (CWA § 319) coordinator

⁴³ NMFS, Puget Sound Chinook Salmon Recovery Plan – 2011 Implementation Status Assessment Final Report, 2011, at 43.

⁴⁴ *Id.*

⁴⁵ Department of Ecology, *Managing Washington’s Coast, Washington’s Coastal Zone Management Program*, Publication 00-06-029, February 2001, at p. 98.

⁴⁶ *Biggers v. City of Bainbridge Island*, 162 Wash.2d 683 (2007).

⁴⁷ *Id.* at 698.

⁴⁸ National Oceanic and Atmospheric Administration - Ocean and Coastal Resource Management, Washington State Shoreline Master Program Guidelines Programmatic Biological Assessment, March 15, 2005. Page 7-12, emphasis added

⁴⁹ Letter From Steven W. Landino, Washington State Director for Habitat Conservation Division of the National Marine Fisheries Service to John King, Chief Coastal Programs Division NOAA Office of Ocean and Coastal Resource Management, re: Endangered Species Act Section 7 Informal Consultation and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Consultation for NOAA’s proposed approval of the Washington State Shoreline Master Program guidelines promulgated by the Washington State Department of Ecology, April 23, 2009.

⁵⁰ In Washington State Department of Ecology's response to comments on Coastal Zone Management Section 309 Program Assessment and Strategy 2011-2015, the agency stated the following: "The [shoreline master program] SMP process involves conducting a cumulative impact analysis to determine whether or not the SMP will result in no net loss of ecological functions...However, at this time there are no broad tools available to quantitatively measure cumulative impacts, and jurisdictions are responsible for developing their own analysis."

⁵¹ According to a recent meeting with the Corps in the Seattle district regarding renewal of nationwide permits

⁵² Toft, J.D., Cordell, J.R. Simenstad, C.A. and Stamatiou, L.A. 2007 fish distribution, abundance, and behavior along city shoreline types in Puget Sound: *North American Journal of Fisheries Management*, v. 27, p 465-480.

⁵³ On June 15, 2011, Darigold, Inc., pleaded guilty to dumping ammonia from its milk-processing plant into an adjacent creek, which resulted in the death of several ESA-listed Puget Sound chinook salmon. The corporation signed an agreement to pay a \$10,000 fine and to donate \$60,000 to a non-profit foundation to pay for habitat restoration work. In addition, the corporation committed to develop an environmental compliance plan to address risks at the half dozen plants it operates in five western states. EPA agents involved in the enforcement action noted that Darigold has a history of spills over the last decade in Washington streams. *Seattle Times*, Darigold Pleads Guilty to Federal Polluting Charges (June 16, 2011), http://seattletimes.nwsources.com/html/localnews/2015331678_darigold16m.html (accessed June 16, 2011).

⁵⁴ 65 Fed Reg 42472 (July 10, 2000) (NMFS Take Guidance).

⁵⁵ See Price, D., Quinn, T., and Barnard, J. Fish Passage Effectiveness of Recently Constructed Road Crossing Culverts in the Puget Sound Region of Washington State, *North American Journal of Fisheries Management* 30:1110–1125 (2010).

⁵⁶ See RCW 90.58.030(3)(e)(ii) (Shoreline Management Act exempts from regulation "construction of the normal protective bulkhead common to single family residences").

⁵⁷ See *Seattle Times* "Beaches Suffer as Walls Go Up" by Warren Cornwall and Justin Mayo (May 13, 2008) found at http://seattletimes.nwsources.com/html/localnews/2004409777_growth_shorelines15m1.html.

⁵⁸ See e.g. Washington State Department of Ecology, Stillaguamish River Watershed Temperature Total Maximum Daily Load Study, March 2004, Publication No. 04-03-010, at p. 71 *stating* that the load allocation for effective shade for all perennial streams in the Stillaguamish River watershed is the maximum potential effective shade that would occur from mature riparian vegetation.

⁵⁹ Washington State Department of Ecology, SFY 2012-2013 Water Quality Financial Assistance Guidelines, August 2010.

⁶⁰ See e.g. Lummi Nation letter to EPA, or Upper Skagit Tribe letter to Governor Gregoire.

⁶¹ Government Management Accountability & Performance regarding Puget Sound, April 06, 2011 8:30am available at

<http://www.tvw.org/media/mediaplayer.cfm?EvID=2011041010&CFID=4788631&CFTOKEN=15725173&bhcp=1>

⁶² *Id.*

⁶³ 16 USC § 1455b (a)(1)

⁶⁴ NOAA and EPA's Findings For The Washington Coastal Nonpoint Program



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September 23, 2025

Scott Diener, Planning Manager
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Heather Cleveland, AICP Long Range Planner
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Dear Mr. Diener,

Thank you for the opportunity to comment on the proposed changes to the Rural and Resource Lands Chapter Update to the Comprehensive Plan, Code Updates, and the Reclassification Requests. The Port Gamble S'Klallam Tribe has been engaged in the Year of the Rural from the beginning and has met with Long Range Planner Heather Cleveland independently and as part of the County's Tribal Coordination Meetings. We appreciate the conversations that we have had with your staff about this important topic, and our comments below are a continuation of concerns already laid out for county staff and now the Planning Commissioners. Thank you for your consideration of the comments below.

Port Gamble S'Klallam Tribe's Treaty Right Interests

The Port Gamble S'Klallam Tribe is a federally recognized Indian tribe and successor in interest to Indian bands and tribes signatory to the 1855 Treaty of Point No Point, which among other things reserved fishing, hunting, and gathering rights and led to the establishment of the Port Gamble S'Klallam Reservation in Kitsap County, Washington. The Port Gamble S'Klallam Reservation sits on the eastern shore of Port Gamble Bay and a portion of Hood Canal, in the northwestern portion of Kitsap County. Since time immemorial, the Port Gamble S'Klallam Tribe and its predecessors have occupied and utilized vast areas of land and water in the Hood Canal, Salish Sea, and the Strait of Juan de Fuca including the western portions of Kitsap County that contain watersheds that drain into the Hood Canal, and the Olympic Peninsula to support the S'Klallam way of life.

Fish and fish habitat are crucial to the cultural, spiritual, subsistence and commercial activities of the Port Gamble S'Klallam Tribe. A change in how future development in the county is needed to support and enhance the protection of essential habitats and cornerstone species. A Report from the Treaty Indian Tribes in Western Washington, Treaty Rights At Risk, published July 14, 2011, states that "Habitat loss and degradation are the biggest contributors to the decline of the salmon resource..." (pg. 7) The issues identified in this report, losing habitat, disparate standards for harvest vs. habitat, need for coordinated leadership are all still applicable fourteen years later. We are still seeing habitat loss and more enforcement /restrictions on harvest than habitat degradation.

Land Use & Zoning Comments

The connection between Rural and Resource Lands Element and implementation updates in the Zoning Code are missing. For example, there are no changes to zoning or to the growth projection of 24%



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(Comprehensive Plan pg. 24) in rural areas that would preserve rural character. Limiting Rural Residential zoning expansion and directing rural parcels to aggregate in size (with willing property ownership) are steps the county can take to implement the Rural and Resource Lands Element. Limiting development in rural areas will have a significant positive impact on preservation of rural character and protections of fish and wildlife habitat conservation areas such as streams, riparian habitat, and wetlands. If these changes are not to specific zoning standards and growth mandates, how will rural development and protection of rural character be implemented?

Change in Rural Land Use Designations. Please provide the tribe with the following data:

How have the number of acres changed for Rural Residential, Rural Protection, and Rural Wooded since the 1998 Comprehensive Plan?

Please acknowledge that Tribal Lands are part of Kitsap County and make up a certain acreage of county land/land use.

Cluster Development is considered a tool for rural development. A tool that protects more critical areas by consolidating development into a denser area. This type of development is not supported by the tribe. When viewed from the street or when parcel size is checked on the parcel search you see denser development, not consistent with rural character.

Add provisions that emphasize ADUs are encouraged in urban growth areas or LAMIRD, not in rural areas. Rural areas are not appropriate for middle housing accommodations.

Reclassification requests should not be approved. Additional rural development is not needed in the county. Development increases in rural areas disproportionately impact critical areas and environmental integrity.

Water Resources

On the draft Rural and Resource Lands Chapter, Rural Environment section, “protect natural ecosystems...” goal, I recommend adding a policy line to the effect of “Identify and protect natural areas contributing to increased aquifer recharge.” This is related to but a broader issue than the KNRAMP policy goal – there’s a need to update our common understanding of which land areas are contributing most to aquifer recharge (emphasizing water quantity as opposed to quality – the current expansive mappings of critical aquifer recharge areas are more focused on the vulnerability of shallow aquifers to contamination). This is important both for outright protection of key recharge areas to allow future precipitation to infiltrate (i.e. preventing additional impermeable surfaces) but also understanding that these sites may offer the opportunity to conduct enhanced or managed aquifer recharge through constructed wetland systems or recycling of treated wastewater

Wildlife Corridors

Small peninsula areas isolated by water and development, such as the PGST reservation, face critical ecological challenges without connections to larger mainland habitats. Wildlife populations suffer from genetic bottlenecks, disrupted migration patterns, and inability to adapt to climate change. Climate



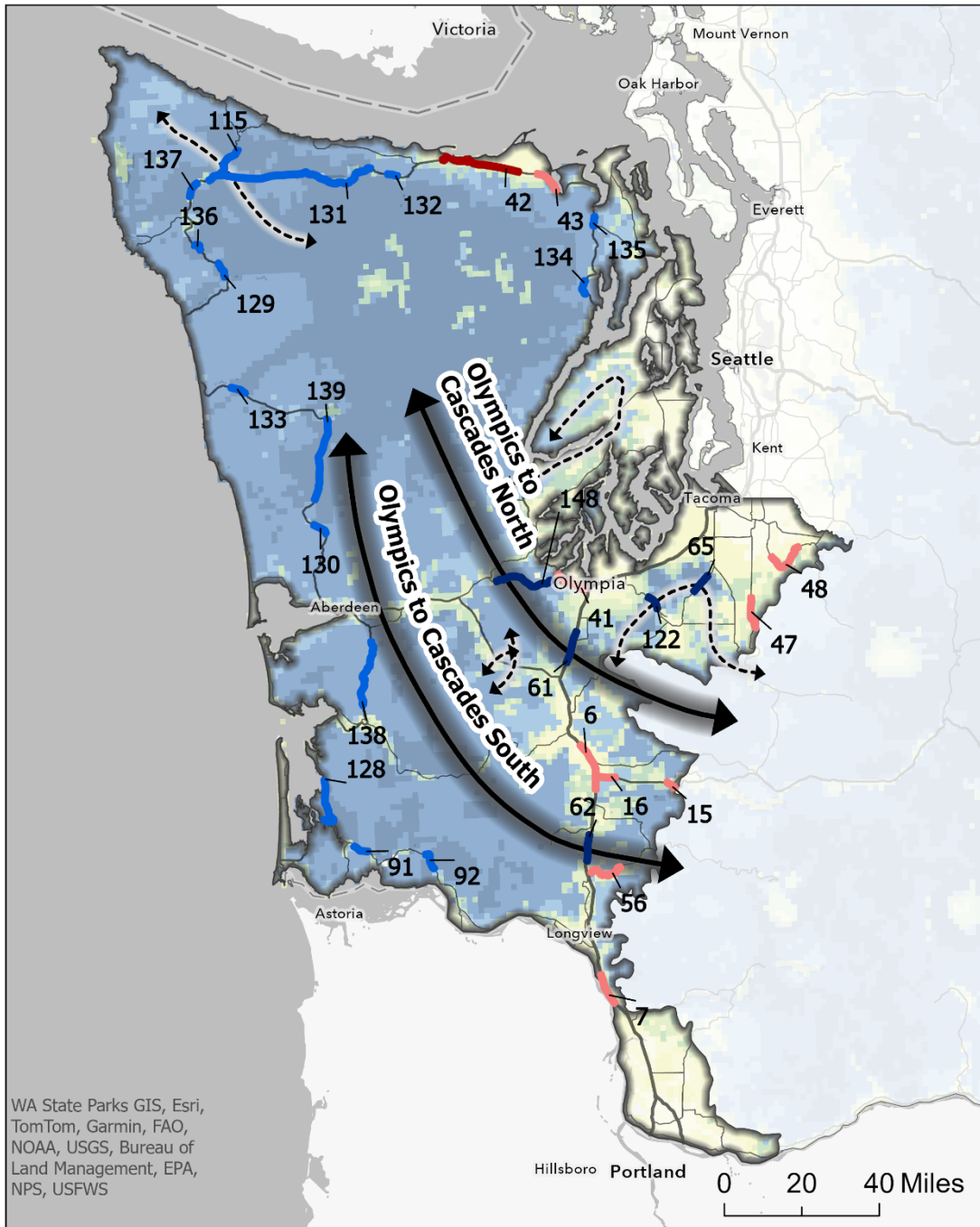
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change adds urgency to corridor development in isolated regions, as species must be able to shift their ranges and elevations as temperatures rise. Wildlife corridors serve as vital lifelines, allowing animals to move between habitat patches for breeding, foraging, and seasonal migration. This genetic exchange prevents inbreeding depression and maintains the genetic diversity necessary for species adaptation and survival. For culturally significant species like deer, black bears, elk, and mountain lions that require large territories, corridors enable access to the expansive ranges they need to find mates and adequate resources. These isolated populations gradually decline toward local extinction as they cannot maintain viable breeding numbers or fulfill essential ecological functions. Establishing wildlife corridor connections to the Kitsap and Olympic peninsula's larger habitat zones is essential for preserving wildlife species biodiversity, and ensuring species can survive environmental changes. See collection of maps below:



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WA State Parks GIS, Esri,
TomTom, Garmin, FAO,
NOAA, USGS, Bureau of
Land Management, EPA,
NPS, USFWS

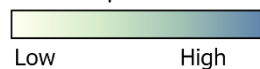
**Southwest Washington
and Olympic Peninsula**



Landscape Priorities

- Connected Landscapes of
Statewide Significance
- Connected Landscapes of
Regional Significance

Landscape Connectivity Value



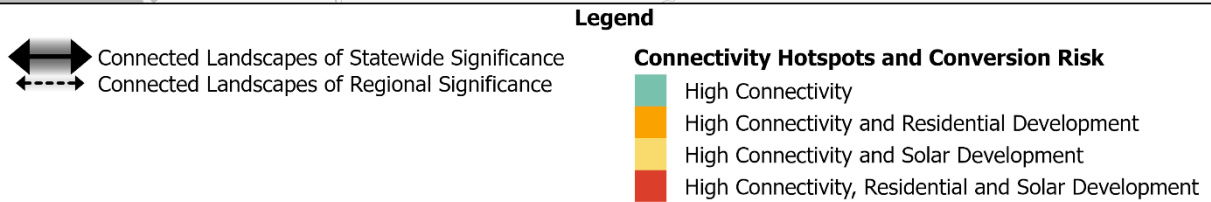
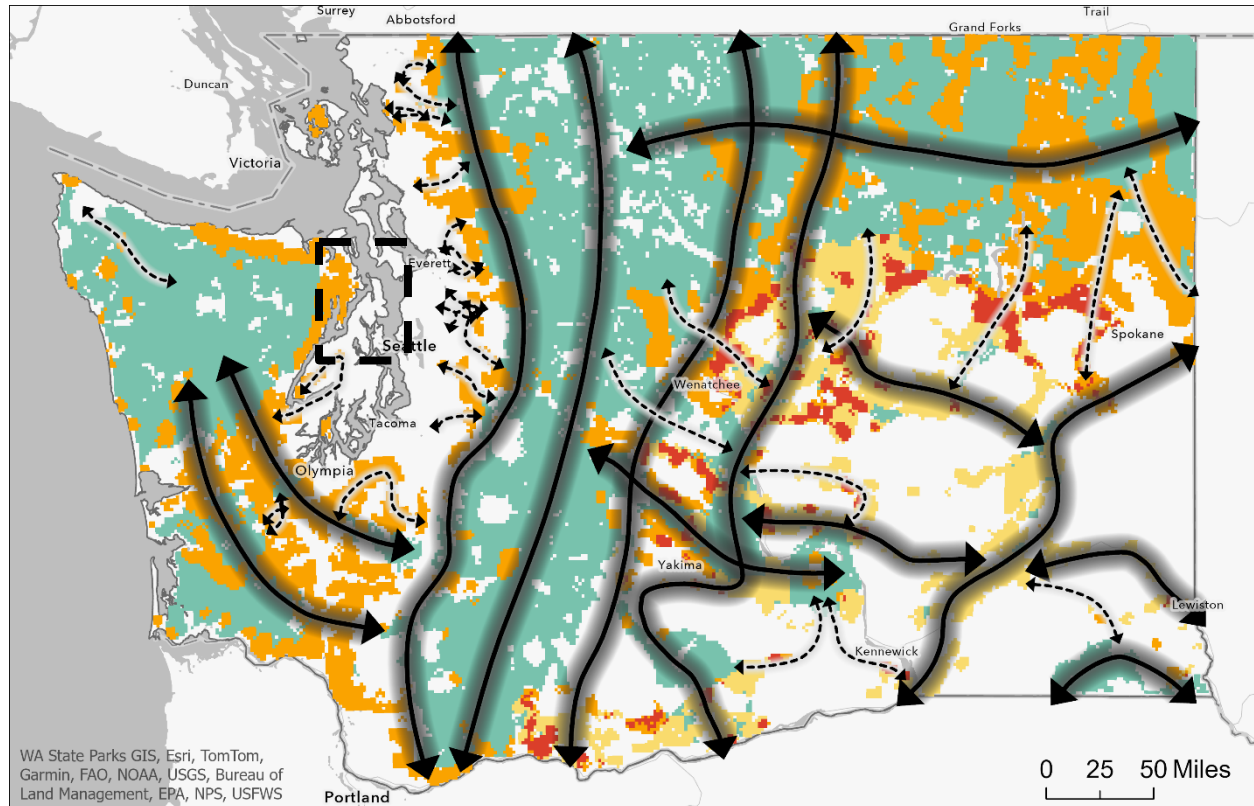
Legend

Transportation Priority Zones

- Ecological - Short List
- Ecological - Long List
- Safety - Short List
- Safety - Long List

Roads

- Interstate
- US Highway
- State Route

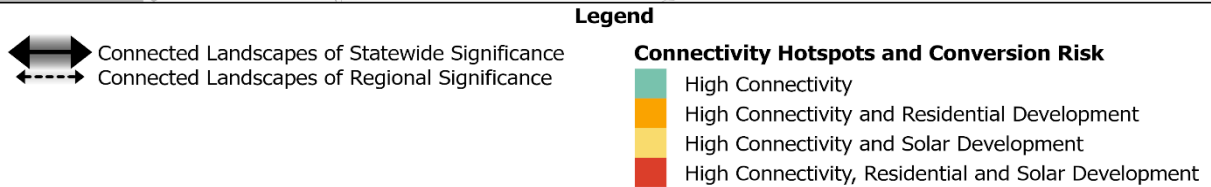
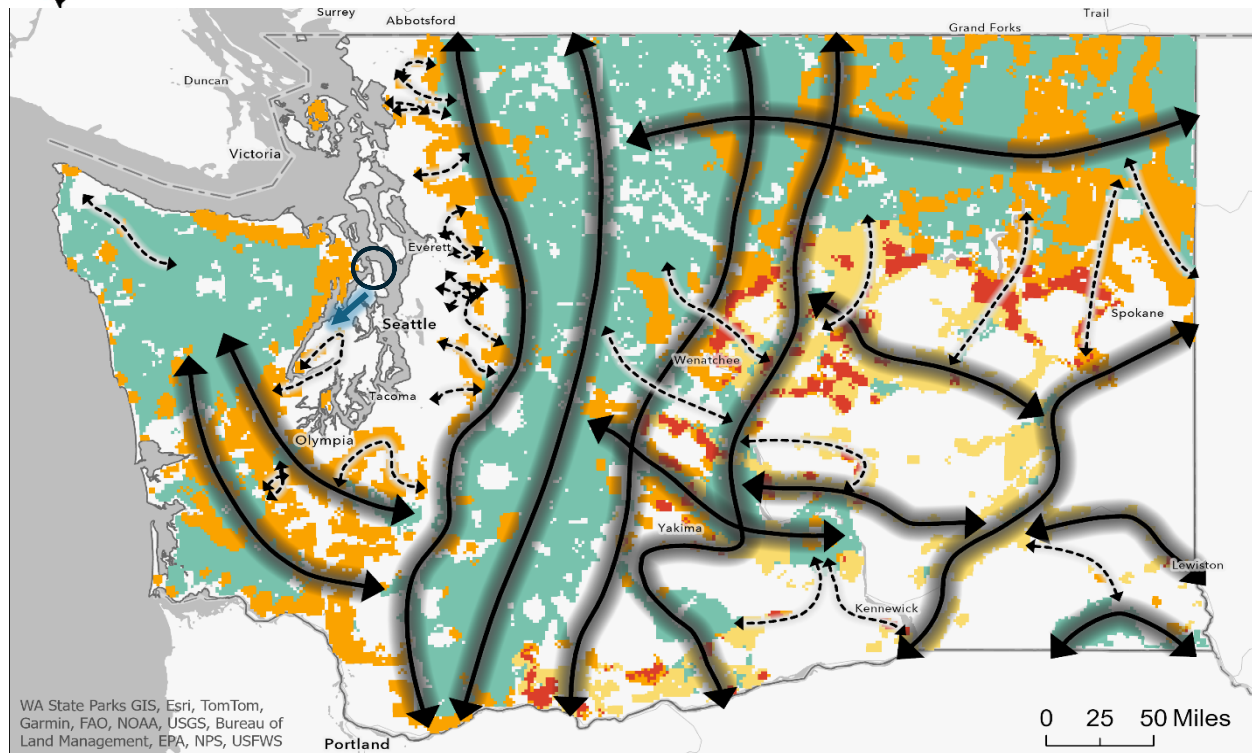


Connected Landscapes of Statewide and Regional Significance overlaid on Connectivity Hotspots and conversion Risk (Figure 15: Washington Habitat Connectivity Plan 2025) shown above. PGST reservation and surrounding land was left without any value and virtually left out of this update.



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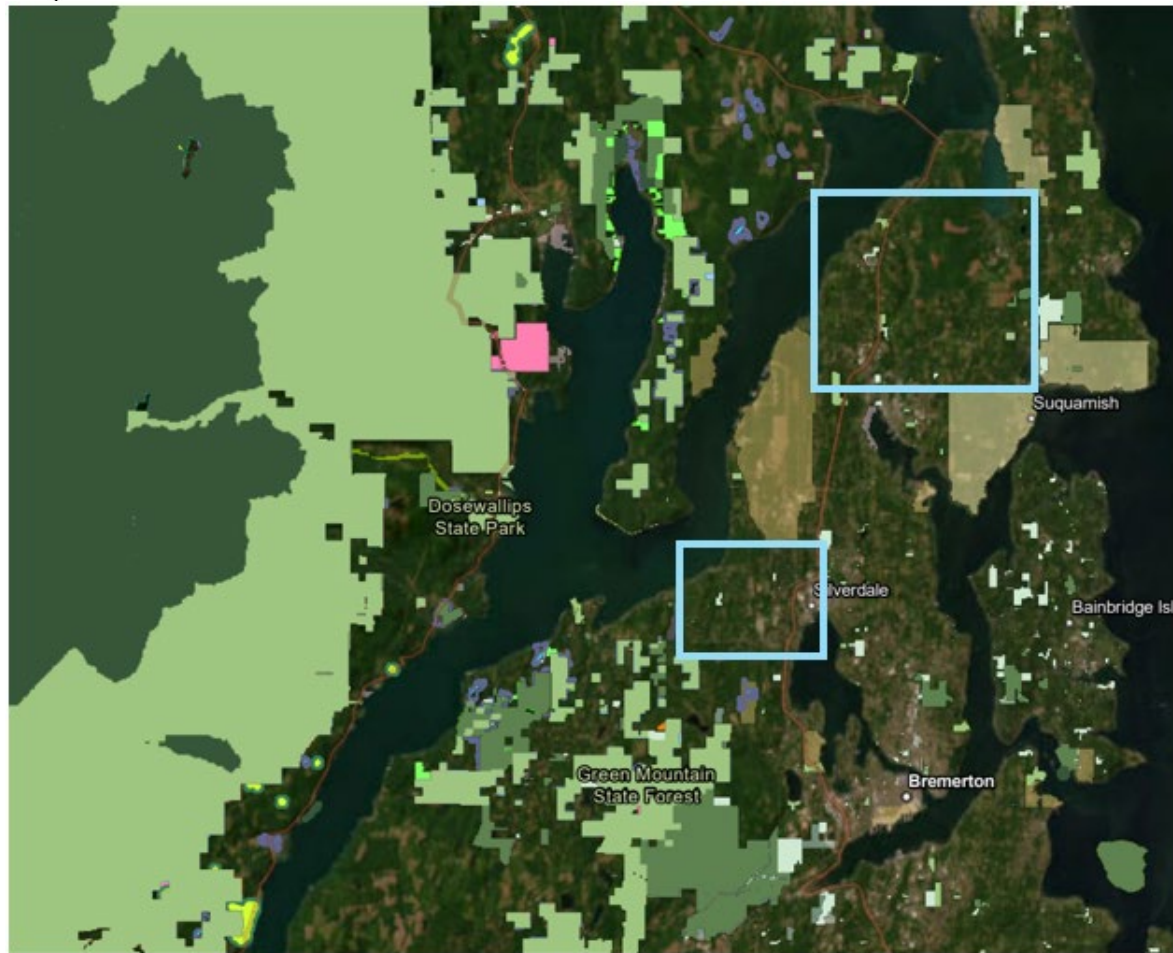


Connected Landscapes of Statewide and Regional Significance overlaid on Connectivity Hotspots and Conversion Risk (Figure 15: Washington Habitat Connectivity Plan 2025) shown above. Black circle indicates PGST reservation. Blue shaded arrow indicates wildlife corridor connection gap to PGST reservation.



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9/23/2025

U.S. PAD-US Protected Areas (USGS & Esri 2020) ElementOccurrences Current w/ 20250730
GAP Status 2
GAP Status 3
GAP Status 4
Rare and/or High Quality Ecosystem
NAPs and NRCAs
Natural Resource Conservation Area (NRCA)
Non-ONR Major Public Lands
WA State Parks and Recreation Commission
Other Federal
Tribal Lands
World Imagery

Low Resolution 15m Imagery
High Resolution 60m Imagery
High Resolution 30m Imagery
Citations
Esri, Earthstar Geographics, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community

Shaded areas represent US, Tribal, and State protected areas. Areas outlined in blue represent the major gaps between protected areas surrounding PGST reservation and wildlife corridors. These areas of where future development and planning need to account for wildlife corridor connectivity to recently updated Washington Habitat Connectivity Plan.



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Outline of PGST wildlife corridor currently in development. Connects north to south from Hansville Block, through Reservation, to Miller Lake. This is an attempt to connect already protected critical areas within the corridor.

We look forward to working with you on implementing these changes. Much more work is yet to be done to ensure our sovereign tribal treaty rights are protected for the next seven generations. Especially as we brace for the impacts that climate change and continued development will have on all our natural resources.

Thank you again for the opportunity to comment during this process. Should you have any questions, please contact Marla Powers at the address or phone number below.

Sincerely,

Marla Powers, Environmental Planner, Natural Resources Department
Port Gamble S'Klallam Tribe
31912 Little Boston Road NE
Kingston, WA 98346
(360) 689-7551 mpowers@pgst.nsn.us



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Enclosure: Treaty Rights At Risk Report
Puget Sound Regional Council Vision 2050

(Entered in YOTR Comment Form 9-22-25 by BParsons but comments were cut off in the form and formatting was not retained)

Submission for Rural and Resource Lands Chapter Update

I am submitting these comments on behalf of the Kitsap Environmental Coalition working group focused on the Year of the Rural. Our focus is on the protection and health of our natural environment and all forms of life including but not limited to humans. The group is still gathering input from members and listening to the views of other organizations. Here are the suggestions we have ready at this time. We expect to comment further as the YOTR work proceeds.

Before getting to specifics of the chapter, we want to emphasize that we support the guiding focus of the 2024 Comp Plan—concentrate housing density in UGA and protect rural areas from sprawl. We also want to express appreciation for the action by the BOCC in June 2025 to not proceed with the Rural Wooded and Rural Protected rezone requests that asked for greater housing density (rezone to Rural Residential).

General Comments on the Chapter

1. We support continued retention of this chapter as a separate chapter in the Comp Plan. Our rural and resources lands are vitally important to the health of all of life in Kitsap. The separate chapter helps to emphasize that.
2. Give more attention to mapping, understanding and protecting wildlife corridors.
3. Give more attention to containing/controlling rural development.
4. Give more attention to protection of critical area ecosystems.

Rural development (p.17-18)

1. We generally agree with policies in this section.

For 5th policy in this category (about Buildable Lands Program):

2. We strongly agree with first strategy to prepare a Rural Lands Analysis. Especially emphasize the location of wildlife corridors and habitat connectivity.
3. The second strategy (about monitoring) needs more than monitoring. It needs enforcement of the policies and needs information on how the data will be used to take any necessary corrective action.

Resource Lands and Working Lands (p. 18-20)

1. Second goal (about forest lands), 4th Policy bullet (on p.19): We are concerned about the language of “use of industry-standard Best Management Practices” within forest resource lands and rural wooded. We want to see clearcutting of forests stopped in Kitsap. This will not happen by supporting “industry-standard Best Management Practices”? Instead, change this to best available science and technology.

2. Second goal (about forest lands), 5th Policy bullet (on p.19): Add a strategy to this policy to this effect: “Encourage longer rotations in timber production, disallow clearcutting and encourage new forestry practices.”
3. Second goal (about forest lands), 6th Policy bullet (on p.19): Change the Forestry Advisory Council to include community members. We need an advisory council that can help to transparently negotiate industry interests with those of various community interests.
4. Fourth goal (about agricultural lands lands), 2nd Policy bullet (on p.19-20): While we strongly agree about having an Agriculture Advisory Council, that council also need to include community members to help to transparently negotiate ag interests with those of various community interests.
5. Fourth goal (about agricultural lands lands), 2nd Policy bullet (on p.19-20): In addition to an Agriculture Advisory Council, consider having an Equestrian Advisory Council that includes both horse owners and community members.

Rural Business (p. 20-21)

1. Question: We Appreciate attention to rural business. How this will be monitored for its value and what needs to be done to support such businesses? How will innovation in rural businesses be encouraged by the county? Please be more specific.
2. Ensure that the Critical Areas Ordinance (CAO) is strictly followed when businesses are set up. Also ensure monitoring and consequences for violation of the CAO.

Rural Services and Infrastructure (p. 21-22)

1. Regarding Goal 2 (LAMIRD), hold fast to the LAMIRD boundaries and requirements. Do not allow sprawl beyond these boundaries and ensure adherence to policies.
2. Give priority to Goal 3 in this category (rural walkability and bikeability). Add strategies to the policy under this goal to support more concrete action. Connections within rural areas are very important.
3. Give greater attention to creeks and other water bodies when building is permitted.

Rural Environment (p.22)

1. This is a very important set of goals and needs to be given priority attention. State that environmental protection in rural areas has priority over other policy categories.

Change to 2024 Climate Change Element (p. 24)

Edit your suggested change to read:

Policy 7.3 Encourage owners of private forests and designated Forest Resource Lands to keep these properties forested or in continuing timber production *using best available science that includes climate change science.*

Strategy 7a. We agree with your change for the 2024 Climate Change chapter except, please drop “in production”. While we encourage a focus on keeping forestlands forested the

county needs to encourage that it be untouched or appropriately thinned/harvested in sustainable ways without clearcutting.

Submission for Code Update

I am submitting these comments on behalf of the Kitsap Environmental Coalition working group focused on the Year of the Rural. Our focus is on the protection and health of our natural environment and all forms of life including but not limited to humans. The group is still gathering input from members and listening to the views of other organizations. Here are the suggestions we have ready at this time. We expect to comment further as the YOTR work proceeds.

1. In our submission on the draft Rural and Resource Lands Chapter we called for a change to the Forestry Advisory Council and the Agriculture Advisory Council to include community members. This needs to be addressed in or before the code updates.
2. It is our understanding that the agriculture community has been actively developing and recommending policy and code changes. Are their recommendations included here? If not, these code updates are premature. Why not wait to update the codes until the Ag Advisory Council is established? This speaks to the importance of forming and supporting advisory councils as soon as possible and before codes are updated.

Submission for Reclassification Request Recommendation

[to be submitted later]

Submission Regarding Draft Reclassification Staff Report, Year of the Rural

September 23, 2025

I (Beverly Parsons) am submitting these comments on behalf of the Kitsap Environmental Coalition working group focused on the Year of the Rural. Our focus is on the protection and health of our natural environment and all forms of life including but not limited to humans.

The Comment Form does not accommodate the length of our comment and thus we are submitting this as an email attachment to Heather Cleveland, YOTR lead county planner.

We have reviewed the Reclassification Requests Staff Report and here are our conclusions re the three Rural Industrial and Rural Commercial Reclassification Requests.

On June 23, 2025, the Kitsap Commissioners issued Resolution No. 117-2025. This resolution set forth general criteria for Land Use Reclassification Requests (hereafter requests.)

Requests must further goals of the Growth Management Act, RCW 36.70A, as well as the 2024 Comprehensive Plan Update and KCC 21.08. Requests will specifically be evaluated on:

- 1) How circumstances related to the request and/or the area in which the property affect by the request is located have substantially changed since the adoption of the 2024 Comprehensive Plan or applicable development regulations;
- 2) How the assumptions upon which the 2024 Comprehensive Plan is based are no longer valid, or there is new information available which was not considered during the adoption of, or during the last annual amendment to, the Comprehensive Plan or development regulations; and
- 3) How the requested redesignation is in the public interest and the proposal is consistent with the Kitsap County Comprehensive Plan.

APP-ID: 57 Moran

The owners of this 5.21 acre rural residential property are Moran Humberto and Larios Adriana Tovar. The owners seek a rezone from Rural Residential to Rural Industrial.

As noted by the staff, the site contains a general purpose building, an unpaved driveway and a parking area. The remainder of the property is forested. Access is from SR-3. A wetland delineation report provided by the applicant notes that a Category III wetland is on the west side of the property. A linear area of high erosion hazard extends through the middle of the property. The property is significantly encumbered by critical areas and buffers. The owners also own a 4 acre parcel to the north, zoned rural residential and developed with a single family residence and a detached garage built in 1964.

The staff reports significant non-compliance for the owners' four acre property immediately adjacent to the subject property. "An active code enforcement matter (Case#CC 220108) exists

for the property. An inspection on 3/17/2022 noted "crew moving dirt, grading are for new building with no permits, new structures built without permits, old garage converted into and used as office for commercial business in residential area, running contractor storage area without permits with standing water/wetlands on west side of parcel, no BMPs in place, truck traffic tracking mud, work continued after stop work was posted."

Hearing Officers routinely deny permits for violations of County Ordinances and State Law. Here the owners are seeking huge financial gain by a rezone from Rural Residential to Rural Industrial. You have to admire the "hutzpah" of the owners in seeking the rezone despite the ongoing and active code enforcement on the owners' adjacent property. In the event that the Commissioners grant this rezone, the decision is very likely to be reversed on appeal, potentially with costs assessed against the County.

In implementing Resolution No. 117-2025, the staff must answer the question of "how circumstances related to the proposed amendment and/or the area in which the property affected by the proposed amendment is located have substantially changed since the adoption of the Comprehensive Plan or applicable development regulations." In the staff report, the staff notes that there has not been a change in circumstances since the adoption of the 2024 Comprehensive Plan. "However, because this proposal was initially submitted in 2022, staff also considered whether circumstances had changed since the adoption of the 2016 Comprehensive Plan.

At this point, the staff failed to follow through with the directive of Resolution No. 117-2025; here is the exact text from the staff report: (TO BE INSERTED, SUMMARY OF CHANGES, IF ANY, IN THE AREA OF THIS PROPOSED AMENDMENT SINCE 2016.) (Capitalization added.)

The Commissioners must deny this reclassification request. The staff report is incomplete. The proposed changes will give a huge economic benefit to the applicant while violating the Growth Management Act. An active code enforcement matter (Case#CC 220108) exists for the owners' adjacent property. An inspection on 3/17/2022 noted "crew moving dirt, grading are for new building with no permits, new structures built without permits, old garage converted into and used as office for commercial business in residential area, running contractor storage area without permits with standing water/wetlands on west side of parcel, no BMPs in place, truck traffic tracking mud, work continued after stop work was posted."

The proposed changes will provide a huge economic benefit to the applicant while violating the Growth Management Act, the Clean Water Act, RCWs and Kitsap County ordinances.

C. APP-ID Stokes/Campbell

Owners Jeff Stokes and Craig Campbell seek a rezoning from rural protection to rural commercial of 7.66 acres. The site is five parcels that total 7.66 acres in size, under the ownership of the two parties. There is a single family residence on one parcel and a mobile home on another parcel, with the remainder of the site being forested. Access is from SE Mullenix Road. The largest parcel and the northeast parcel are heavily encumbered by critical areas.

Burley Creek, a Type F stream, runs through these properties with a mapped wetland corridor. Areas of seismic and geologic hazards are on three of the five properties.

In implementing Resolution No. 117-2025, the staff must answer the question of "how circumstances related to the proposed amendment and/or the area in which the property affected by the proposed amendment is located have substantially changed since the adoption of the Comprehensive Plan or applicable development regulations." In the staff report, the staff notes that there has not been a change in circumstances since the adoption of the 2024 Comprehensive Plan. "However, because this proposal was initially submitted in 2022, staff also considered whether circumstances had changed since the adoption of the 2016 Comprehensive Plan.

At this point, the staff failed to follow through with the directive of Resolution No. 117-2025; here is the exact text from the staff report: (TO BE INSERTED, SUMMARY OF CHANGES, IF ANY, IN THE AREA OF THIS PROPOSED AMENDMENT SINCE 2016.) (Capitalization added.)

The owners have submitted at least three prior requests for rezoning; all were denied.

2006-Reclassification request #112 was denied; subject parcel is not located within a water or sewer service district. Almost a third of the site appears to be constrained by a wetland and its buffer. Surrounding uses consist of residential, undeveloped and one stand alone commercial parcel to the south. The parcels are designated Rural Protection and are about one-half mile from the POSK preferred alternative boundary.

2009-Permit # 09-65996 "Comp Plan Amendment-Site Specific Application. Denied

2015-Permit # 15-00741 "Comp Plan Amendment-Site Specific Application. Denied/Withdrawn

The Commissioners must deny this reclassification request. The staff report is incomplete. The proposed changes will give a huge economic benefit to the applicant while violating the Growth Management Act, the Clean Water Act, RCWs, and Kitsap County ordinances.. Over the past nineteen years, Kitsap County's Commissioners have denied every prior request for rezoning.

APP-IE: 07 Skrobud-McCormick Lands Co.

"This site is a 20.95 acre parcel that is currently developed with a mobile home, carports and garages, two office buildings, a storage building and a shop building. The remainder of the property is forested. (emphasis added.)" The applicant indicates that there is a stream abutting the south boundary of the property that discharges into a ditch, which was associated with a former road northeast of the property. Critical areas maps show a Type N stream to the south that may have buffers located on the subject property or extending into the property.

The staff noted that "the Coulter Creek Heritage Park is nearby on the north side of Lake Flora Road. The Trophy Lake Golf Course is to the east. Several single-family homes are also located to the east. The site is bordered by SW Lake Flora Road to the north. The site is approximately

0.8 miles south of the City of Port Orchard. The present Comprehensive Plan Map and zoning for the property is Rural Wooded."(emphasis added.) Rural wooded zoning allows for forest resource uses and limited residential uses with a maximum density of 1 dwelling unit per 20 acres.

As part of the Findings of Fact, the staff noted that adjacent properties are zoned rural wooded, rural residential and park.

In implementing Resolution No. 117-2025, the staff must answer the question of "how circumstances related to the proposed amendment and/or the area in which the property affected by the proposed amendment is located have substantially changed since the adoption of the Comprehensive Plan or applicable development regulations." In the staff report, the staff notes that there has not been a change in circumstances since the adoption of the 2024 Comprehensive Plan. "However, because this proposal was initially submitted in 2022, staff also considered whether circumstances had changed since the adoption of the 2016 Comprehensive Plan.

At this point, the staff failed to follow through with the directive of Resolution No. 117-2025; here is the exact text from the staff report:(TO BE INSERTED, SUMMARY OF CHANGES, IF ANY, IN THE AREA OF THIS PROPOSED AMENDMENT SINCE 2016.) (Capitalization added.)

The staff report notes that in the case of Rural Commercial/Industrial and Type III LAMIRD Site Specific Amendment requests, every one of seven requirements must be satisfied for a recommendation for approval. The very first requirement is "demonstration of an unmet need for the proposed land use designation in the rural area." The staff states that "neither the 2024 Comprehensive Plan nor other existing studies indicate whether there is an existing unmet need for rural commercial or industrial lands." The staff "fudges" the additional six requisite criteria to attempt to "justify" the reclassification.

The Commissioners must deny this reclassification request. The staff report is incomplete. The proposed changes will provide a huge economic benefit to the applicant while violating the Growth Management Act, the Clean Water Act, RCWs and Kitsap County ordinances.