Boundary Line Adjustment (BLA) Draft Code - Proposed Changes from Public Comments

PC Briefing 11/18/2025

Commenter	Draft Code Section	Comment	Staff Recommendation	Planning Commission Recommendation
William McCoy	Section E.8.	I support adding a clear BLA process; however, I'm concerned one part of the proposed code re: decision criteria - "The adjustment is not part of a concurrent or sequential series of multiple proposed adjustments which would circumvent the subdivision regulations in Chapter 16.40, including but not limited to having the effect of altering a recorded plat." - reads so broadly that any BLA within a recorded plat could be viewed as "having the effect of altering a recorded plat," even where no dedications, roads, or easements are changed. That outcome would be inconsistent with state law distinguishing BLAs from plat alterations and could chill routine, lawful BLAs between platted lots. I urge that this language be tightened up so it's clear that BLAs that alter platted lots are permissible. For example it could be worded as: **"The adjustment shall not be part of a concurrent or sequential series of adjustments that would result in the creation of additional lots, tracts, or building sites, or otherwise circumvent the subdivision requirements of Chapter 16.40. Boundary line adjustments within a recorded plat are permissible provided they do not modify dedications, roads, easements, notes, or other features shown on the face of the plat that would require a formal plat alteration**".	The draft code section was based on similar language in the City of Poulsbo's BLA code. DCD staff and Legal support revising this section to correspond to Mr. McCoy's suggested language. Additionally, the state limits short plats to no more than one every five years involving the same lots, to avoid "daisy chaining" of short plats to avoid the regular subdivision process. Legal suggests a similar time frame limitation for BLAs involving the same lot or lots.	
Kitsap Public Health District	Sections E.6. and E.10.	For criteria #6, there are no standards listed to determine "adverse impacts" on water supply or septic systems. We would suggest that the standards that should be applied for that determination would be the requirements of the applicable Kitsap Public Health Board ordinance(s)... For criteria #10 the language "proposed to be served by onsite sewage disposal systems" should be removed...**it would be more consistent and provide a more thorough review to simply require that every BLA receive Health District approval prior to director approval."**	DCD staff concurs with KPHD's recommendation, as highlighted.	
Kevin Biggs	Sections F.3. and J.	Mr. Biggs believes that Section F.3. could be read to only require property combinations (mergers) to have their revised legal descriptions and survey maps recorded with the Auditor.	As Mr. Biggs notes, both property combinations and BLAs are required to record their revised legal descriptions and survey maps with the Auditor. Staff recommends that F.3. be deleted, and J. be revised to state: "Within one year of approval of the application <u>for a boundary line adjustment or a property merger</u>, the applicant is required to record all final documents with the County Auditor, including the survey map signed and stamped by the Surveyor<u>, revised legal descriptions,</u> and any deeds conveying property. ..."	