

Chapter 6. Responses to Comments

6.1. Introduction

Kitsap County issued a Draft Supplemental Environmental Impact Statement (Draft SEIS) for the Comprehensive Plan Update 2016-2036, prepared in accordance with the State Environmental Policy Act (SEPA) on November 6, 2015. The County issued the Draft SEIS with a 30-day comment period, concluding December 7, 2015.

A list of commenters providing written and verbal comments is provided in Exhibit 6.1-1 below. A copy of the comments received during the comment period follow the responses to comments table, and are marked to correspond with the letter and comment number. Kitsap County posted the comments at its project website, which at the time of this writing was as follows:

http://compplan.kitsapgov.com/Pages/PublicCommentNov6_to_Dec72015.aspx.

Exhibit 6.1-1 Matrix of Commenters – Kitsap County Comprehensive Plan Update

#	Author Name	Comment, Letter or Letter Title	Letter
1	Bek Ashbey, City of Port Orchard	Re: would like more time to review DSEIS	Letter
2	William Ashby	Site-specific UGA removal Permit #'s 15 00454 and 15 00457. The above 2 UGA removal applications refer to a 30 ac farm and an abutting 7 1/2 acres. These 2 parcels contain critical wetlands in support of coolcreek, a salmon bearing stream. Stream buffer fencing and wetland exclusion area fencing exists to preclude cattle entry. Currently running 20 head of Herefords. Kit Co. conservation district has complete records. These 2 parcels have no belonging in any UGA; be it Alt 1, 2, or 3. I prefer Alt 3 should be site-specific removal permits be denied.	NA
3	William Ashby	I strongly support Alternative No. 3. I own a 30ac agriculturally zoned farm. "Cool Creek", a salmon bearing stream runs through the farm. The farm has critical wetlands in support of "cool creek". Stream buffer fencing, wetland exclusion area fencing is established, Kit Co. conservation.	NA
4	Craig Baldwin WestSound Engineering, Inc.	15 00657 Gonzalez. As the owner's engineer, I noticed that Exhibit 1 and Item 'M' both list the property to the east as vacant or undeveloped. As noted in Item 'H', there is a gas station on the RCO parcel to the east.	NA
5	Phil Best	RE: Kitsap County Comprehensive Plan Update	Letter

#	Author Name	Comment, Letter or Letter Title	Letter
6	Laurel Blaisdell	My mother owns 17 acres of land in Port Orchard at 5315 E Blaisdell Lane. Currently due to zoning laws we are unable to divide the land in less than 5 acre lots. Surrounding property has been zoned to much smaller lots. When my mother dies how are we supposed to divide this land fairly between 4 siblings? It's impossible! Can you please change the zoning laws so that we can do a fair division of the land? All we are asking is fairness of the zoning laws. It makes no sense that our property has been singled out to be the only land in the area that has to be 5 acre plots. This is a very serious problem in our family. We have had this property in our family since the 1940s and would greatly appreciate a fair division. Appreciate your time and consideration.	NA
7	Peter Boorman	Port Orchard UGA. 1st choice- Alternative 3, 2nd choice- Alternative 2 I completely reject the original UGA. 1. You cannot provide adequate infrastructure for Alt #2 never mind your original plans for the UGA. 2. Two of the major developers proposed at SE Baker and Phillips are/were 3 years delinquent on county taxes-how can you expect them to pay assessments? 3. West sound utility cannot supply water and sewerage without #3-5m and the 2 developers cannot pay taxes how can they pay over \$800,000.00 in assessments?	NA
8	Martha Burke	Department of Community Development Dear Sir: I am a member of the Suquamish Citizen's Advisory Committee and I am sending this Email to comment on the draft Comprehensive Plan for Kitsap County. My comment is in regard to the Capital Facilities Plan, and specifically the Transportation Improvement Plan. We spent considerable time in Suquamish to describe and prioritize what we would like to see for our community over the next 10 years. The Subarea Plan for Suquamish does a good job in capturing that. However, to implement those priorities, they have to be included as priorities of the Capital Facilities Plan, and more specifically as priorities for the Transportation Improvement Plan or TIP. We have tried to have the TIP include projects that we think are very important, not just for Suquamish, but for North Kitsap as a whole, and in fact for all of Kitsap County. The paving of the shoulders of Miller Bay Road leading out of Suquamish to Kingston is one such project. That would make this route much safer for non-motorized traffic such as bikers as well as pedestrians. It would provide options to using a car, which we thought was a goal of the County. It would attract more bikers, both recreational as well as commuters, and make North Kitsap more popular as a recreational destination, similar to what has happened in Jefferson County. Yet this project is never funded and we are lectured regarding how the cost of such improvements make them unaffordable. No such improvements are included as priorities for funding over the six years of the TIP except as a place holder for the farthest year out. County staff has been supportive of our efforts in developing a Subarea plan for Suquamish; now we need your help in having it realized. Thank you, Sincerely, Martha Burke	NA
9	Roma Call, Port Gamble S'Klallam Tribe, Natural	RE: Draft Supplemental Environmental Impact Statement, Draft Comprehensive Plan Update 2016-2036	Letter

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	Resources Department		
10	James and Sergia Cardwell	RE: Oppose the reallocation of commercial properties in South Kitsap to Central and North Kitsap	Letter
11	Tom Curley	RE: Covers detailed issues regarding Suquamish	Letter
12	Jeff Davidson	I would like to see community centers in the south end and north end. Could you extend the sewer and water projects out to NW Hal Mile Rd.? Section 4-102, Half Mile Road should be shown as a Bicycle Route that connects to Clear Creek Rd. You cannot connect to Clear Creek Rd from Trigger Ave. Section 4-106, Half Mile Road recently had traffic counts performed and should be re-evaluated.	NA
13	Chuck and Carol DeCosta	We need something like California's Proposition 13 to prevent taxes from forcing retirees like me out of our homes.	NA
14	Chuck DeCosta	RE: Covers concerns, Title 2 and Title 5.	Letter
15	Chuck and Carol DeCosta	A good system in this area that can be improved upon is the phone service for cell phones and computer connections. I live in Seabeck and do not get reliable cell phone service, nor any computer service or TV service that is consistently reliable as they are both by satellite. I have underground electrical service so it is costly to dig to install lines for Cable. How about installing a cell tower transfer station for these type of area like they have to the electrical meters in our area that use that technology so they don't need meter reader? With all the new technology this is now practicable.	NA
16	Chuck and Carol DeCosta	The one thing that can be greatly improved in this area is a compiled notification system for all events going on in the community. You would think a master calendar of events on the County Website would be a great vehicle for compiling such events. At present there is no one place to go to see all the scheduled and known events going on in the area both private and governmental and County.	NA
17	Mary Earl	RE: Silverdale Plan	Email
18	Ron Eber	RE: Detailed comments on all documents	Email
19	Charles Ely	The two areas that I feel need more emphasis in the Comprehensive Plan are the preservation of agricultural lands and more areas set aside for the shooting sports. Thank you	NA
20	Susan Ganer	Where are the maps that designate boundaries for sub areas? Maps for Land Use designations? It is VERY difficult to comment when I cannot find how the plan affects my property.	NA
21	Dean and Judy Geisman	My husband and I want out of the UGA. We live at 5879 SE Phillips Rd. We moved there because it is an open and uncrowded area. It's quiet and peaceful. We would like it to remain that way. We don't want water and sewer going down Phillips or housing developments springing up all around us. We are in favor of zoning map #3 for Port Orchard.	NA

#	Author Name	Comment, Letter or Letter Title	Letter
22	Ron L. Gillespie	RE: Comprehensive Plan input from Ron Gillespie Page reference are taken from the CD purchased from DCD	Email
23	Brittany Gordon; Area Habitat Biologist; Washington Department of Fish and Wildlife	Re: comments on all elements of the Comprehensive Plan Update	Letter
24	Gormanous, Kathy	I personally can really only comment on the area that effects me, and that is the Silverdale UGA. I think that this area should stay the same and support the Silverdale UGA map staying the same. I think that classifying an area as "Urban Cluster Residential" is a term that is misleading. What exactly does "Cluster" mean? For Kitsap County, I believe the component of rural and farmland still remains true to this day. It is important to remember the roots in which this community was built upon and where we are going tomorrow. Allow Bainbridge Island and Downtown Bremerton to become bedroom communities to the Metropolitan Seattle, but keep the center core of the county partly rural to give the sense of community and to allow for fellowship amongst those who still choose today to raise their families on the core components of rural living. This will allow for the continuation of farming to which we enjoy keeping local and to which this county enjoys preserving as part of the roots and spirit of what it was once built upon. As big box stores and businesses bring in revenue to the County and Cities within the County, the County has been able to support itself by the constant influx of military and commercial businesses currently within the area, we do not need to turn into another Lacey and Tumwater. This community is not suffering from tax revenue, if nothing else, this County and Community has remained steadfast and whole and can afford to continue sustaining farming, parks, open space, and trails in conjunction with the conservation district keeping historical locales a part of history and community.	NA
25	Gormanous, Kathy	No to Urban Cluster Residential	NA
26	Patricia Graf-Hoke, Visit Kitsap Director	RE: Detailed comments on tourism related topics	Letter
27	Patricia Graf-Hoke, Visit Kitsap Director	RE: Detailed comments on tourism related topics	Letter
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29	Patricia Graf-Hoke, Visit Kitsap Director	RE: Detailed comments on tourism related topics	Letter
30	Patricia Graf-Hoke, Visit Kitsap Director	RE: Detailed comments on tourism related topics	Letter
31	Patricia Graf-Hoke, Visit Kitsap Director	RE: Detailed comments on tourism related topics	Letter
32	Scott Hall	RE: Comments on 2016 Kitsap County Draft Comprehensive Plan	Letter
33	Jerry Harless	RE: November 2015 Draft Comprehensive Plan, Capital Facilities Plan and Supplemental EIS	Letter
34	Harris, Steven	RE: Elverd Lee Harris Credit Shelter Trust Permit Number 15-00724	Letter
35	Harris, Gary	RE: Elverd Lee Harris Credit Shelter Trust Permit Number 15-00724	Letter
36	Yula May Harris	RE: Elverd Lee Harris Credit Shelter Trust Permit Number 15-00724	Letter
37	Jim, Cathy Hayes	RE: 4803 Anderson Hill Road	Letter
38	Gary Stewart/ Cathy Hayes/ Gary Stewart/ Cathy Hayes	(Silverdale Urban Growth Area) The Urban High Res. Proposed zoning change (from mixed use). On the SW side of Anderson Hill Rd (across from High school and Jr. High) will not support that proposed density. There is a fish bearing stream (strawberry creek) that runs through that area and the road traffic patterns would be prohibitive. (Properties would never be developed if changed to Urban High zoning). Better Alternative would be to leave as Mixed Use or change to Urban Low Res.	NA
39	Kevin Kilbridge	The maps of Kitsap County show a county park astride Wynn Jones Road in South Kitsap (purple on your map). Many years ago, the county put up a nice big sign, "Thomas Wynn-Jones County Park". It was gone almost immediately. I guess that Mr. Wynn-Jones gave the land including his house to the county and that the county deemed it a non-strategic parcel and sold it. There is a watershed protection area in the neighborhood marked by signs in a few places around the perimeter. Has this anything to do with Wynn-Jones? Unsigned county parks seem very strange to me. Please let me know about it.	NA
40	Kitsap Livable Environment Action Network (KLEAN)	KLEAN associates: Bruce McCain, PhD, Bert Jackson, Marilyn Bode, Mary Gleysteen, Margaret Tufft, Craig Jacob brown, Alice McCain, and Mark Barabasz Re: Letter regarding Port Gamble area and policies	Letter
41	Tecla Legge	I appreciate the more common sense recognition of fragile geography found in Alternatives 2 and 3 for the Kingston plans. Keep on working.	NA

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42	Mark Libby	After reviewing the material presented in the November Comprehensive Plan Open House meetings, I am writing to support the "Kingston UGA Option 3" that proposes a 4% expansion of the UGA by including the Jefferson Point area. In my opinion as a Kingston resident, including Jefferson Point in the UGA is recognizes the reality that this area is already developed, densely populated, and divided into small lots. Inclusion in the UGA should facilitate the needed installation of public infrastructure, including water, sewer, fiber optics and road improvements. The proposed UGA Option 3, (and Option 2), also provides an improved designation of public property and a lower density zoning in the geo-hazard areas along the Ohio Avenue bluffs. I strongly support those changes to the Kingston UGA. Thanks for your outreach and consideration of my "local" view point.	NA
43	Michael Maddox	RE: Land Use Reclassification Request	NA
44	Mark Mauren	Re: Comments on many elements of the Comprehensive Plan update and specific Land Use Reclassification Requests	Letter
45	Joyce Merkel	RE: Tax Lot 092501-3-011-2008 Consideration should be given (and changed) to extend the bus. Com. Zoning west of clear creek road and south of 2-006 tax lot (see map) all the way south to Greaves Way. Reasons/Findings: 1.) Entire area is mostly commercial now and with non-residential 2.) The area is 2 min. from /to major arterial easy Access 3.) Not suited for residential use 4.) The old Clear Creek Road Right-of-Way (not vacated) divides the properties from the B-conu. to the west. 5.) The Clear Creek to the South also divides these properties from the Large B-C to the West. Please See Map.	Letter (attachments)
46	The Mischels	RE: Comments on density issues	Letter
47	NA	I own property on Phillips Rd South of Danado. I believe Alternative 2 makes the most sense.	NA
48	NA	Avery/Curtiss Site-specific. Alternative 2 is grouping out site with many blocks to the west, most of which are not buildable. Our site has all utilities available to site, as well as road access. Please consider our site separately rather grouping as both Alternatives show.	NA
49	NA	I live in NW Silverdale. I am concerned that the expansion outside the current retail core will change the rural, natural quality that drew us to purchase our home in the area. I especially do not like Alternative 3 for this reason. I am concerned because I do not like the way big box stores dominate the landscape (example-East Bremerton). Having just returned from California, I do not want us to suffer the same fate of strip malls and industrial areas that encroach upon residential areas. Small mom-and-pop store are one thing. Unfettered large scale retail and industrial development is another thing entirely. My concern is heightened by the new shopping center on Greaves Way. This is not the direction I would like to see our county continue going vis-a-vis development. I had high hopes that the shopping center would be nicer. Instead, we have "the great wall of Silverdale" as the first thing we see when entering Silverdale from the north. The shopping center itself is a California stipe strip-mall separated by a	NA

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		parking lot. Perhaps the rest of Kitsap county should place a higher level of concern on maintaining aesthetics better (like Bainbridge-when development seems more carefully controlled).	
50	NA	Alternative 2 the best so far. Can be changed to add rural residential category South of Tibardis - East of Tracyton Blvd to Stampede. / Keep Barker Creek Restricted or protected or whatever term is used for NO GROWTH- keep natural.	NA
51	NA	The Silverdale growth options: Alternative 2 is better. Denser growth with more tall buildings serves the community much better than a geographically expanded area. Silverdale will be a more cohesive community with a dense core to create a "soul".	NA
52	NA	South of Tibardis and East of Tracyton Blvd to Stampede road should be rural residential	NA
53	NA	You cannot keep a rural feel to the county when you allow for urban development around that/ Bay- keep the bay areas rural-(Bay from Fairground North to Silverdale). Try to keep some of the area into parks for public access. Much of the area around the Bay is wetlands- it serves the purpose of cleaning the water- let's be environmentally sensitive.	NA
54	NA	Royal Valley - should remain Senior Citizen category / Rural Restricted - Barker Creek area should be Rural Restricted / Silverdale Shoreline - from Silverdale to Tracyton on west side of Tracyton Blvd)- East side should all be rural residential and not urban	NA
55	NA	#2 Kingston Alternative #2 makes sense as it protects the land surrounding the public schools. - I would urge alt #2 - thanks	NA
56	NA	Kingston Urban Growth Area Alternative #2 makes the most sense as I can see it. Wow... I should have done my homework- a lot of work went into this and by the way, why isn't Kingston a town?	NA
57	NA	5315 Blaisdell lane in port orchard is unfairly zoned. Please include it in the growth area from r5 to r1. Thank you for your time and attention to this.	NA
58	NA	<p>PLEASE PLEASE PLEASE CHANGE the 5315 E Blaisdell Lane property to R1 like all the parcels around us! If you look at the map NOBODY around us has acreage we are the only ones impacted by this zoning! This is simply unfair!</p> <p>My father bought this land in the depression, we have paid taxes ever since. My mother is in hospice now and there is no way to fairly divide the estate with the 5 acre minimum. The growth management act boundary came within a few hundred feet of out property but sadly 5315 E Blaisdell lane was outside the growth area. We are the only property in the area impacted by this arbitrary boundary.</p> <p>We understand the zoning and growth boundary area are under review.</p> <p>Please modify the boundary to include all of Blaisdell lane in the growth area.</p> <p>It is ONLY FAIR!</p>	NA

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59	NA	<p>Please include Blaisdell Lane in the growth area, to be R1 instead of R5. There are no other properties that have large acreages and this property should be allowed to match the surrounding area.</p> <p>To limit this pocket of land to 5 acre minimum is unfair to the family that owns this land and would like to distribute it among relatives in the future. Please consider including Blaisdell Lane in the growth area.</p> <p>Thank you for your consideration in the matter.</p>	NA
60	NA	I did not see the Fire District information that was submitted?	NA
61	NA	The development of business and industry should be paramount in this plan. This is necessary to create meaningful employment to our citizens. It should foremost in the mission statement. We should be appealing to the state to set up tax free zones for industry.	NA
62	NA	<p>All, First, Good Draft. Second, As member of the Kitsap County Non Motorized Citizens Advisory Committee I want to support the Transportation Section of the new proposed Comp Plan. I am very pleased to see the Multi-Modal support to Transportation being recommended in the Comp Plan Transportation Section.</p> <p>As you know, I have been a big proponent here in the Kitsap of Sustainability for decades. NMT is a huge part of that sustainability picture and I have been at the fore front of that movement to change Kitsap Co. approach to NMT, especially since starting NKTA in 2007.</p> <p>As you have heard me say countless times in the past, and I am happy to see in the new Comp Plan, that; It is important to recognize the link between supporting non-motorized transportation, our economy and our citizens health. The new generation that will be our leaders and business builders are increasingly demanding non-motorized links for their schools, workers, family and recreation. To compete with the Counties and States around us we need to stay ahead (catch up here) of the curve and the demands from citizens for NMT, if we want to attract business and their work force in the future, to our county.</p> <p>One of the businesses we must not forget about in the Comp Plan is the Equestrian. I know that this sounds funny at first, but if you think about it and the money spent to have healthy horses, it raises ones eye brows. Think of it this way: If you have a horse you need land (lots of it), barn, big truck, horse trailer, farm equipment, fencing, feed, tack.....did I mention a Vet and maybe lessons, yet?</p> <p>Here's a fact I didn't know until I was President of NKTA. Kitsap County has one of the largest horse populations in this State!</p> <p>Also, In the Comp Plan it should be noted that Kitsap County Parks needs to support the existing Equestrian business by providing trails and parking areas. Kitsap County DCD needs to support the retaining of large parcels of open space for farms for producing local foods, so that we are less dependent on others far away for our needs and we support local businesses. Kitsap County also needs to support the recycling of the waste products from farms into compost and soil amendments for our gardens and cultivated fields. Locally produced soil amendments do not have to be trucked in from out of the county and there are thriving landscape businesses in need of the locally produced resource. We need to support and encourage this recycling of these farm wastes and less dependence on harmful chemical fertilizers, if we are looking to</p>	NA

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		support a more sustainable future. Kitsap County needs to support restorative forest management and open spaces on our Private and Public lands. I am on the Kitsap County Parks Forest Citizens Advisory Committee. Forest and tree health and abundance is not a luxury.	
63	NA	Kingston UGA - For the area along OHIO AVE NE, I am in favor of the reduced density as shown on Alternatives 2 and 3. (Reduced to 1-5 DU/AC).	NA
64	NA	The Parks and Trails detailed Plan needs to be included in Comp Plan. Last time it was included as Appendix E.	NA
65	NA	Not clear what's happening in Kingston...seems like less density in the areas surrounding Kingston and not much of a change to the central area. Would suggest add opportunities for higher density in Kingston along the main street to the ferry	NA
66	NA	I support option #2 Generally to the extent it concentrates growth in urban growth areas near transit and other services. - On the Central Kitsap Plan, all of the properties on the west side of Almira should be high density residential, not the one w/ NBHD commercial. - A little concerned about higher densities at Gorst w/out some significant transportation/alleys improvements though I support the concept of additional density in the area.	NA
67	NA	Vacation Rentals are becoming a huge problem in our neighborhoods- How can we do "Help your neighbor" when the neighbors constantly change?	NA
68	Rex Nelson	I live on Lars Hansen Rd 1/2 mile north of Banner Forest. Apparently the 1 House 10 Acre zoning has been retained.	NA
69	Tom Nevins	CapF and Utilities Policy 29. Consider the impacts of sewer plans on groundwater quality and quantity. Change 'Consider the' to Prevent. Groundwater is an essential community asset therefore protection must take precedence over development/property rights.	NA
70	Tom Nevins	RE: Central Kitsap UGA zoning changes The re-zone along Highway 303 up to the Brownsville H'way allows commercial/industrial uses. This is unneeded and removed the rural residential feel of more of H'way 303. There was once an attempt to limit the Highway 303/Wheaton Way commercial development northward movement at Fairgrounds Road. That was the community value a decade ago. Has that changed? Is there an unmet need? Unless compelling argument in favor, the zoning should not change.	NA
71	Tom Nevins	RE: Detailed comments regarding Land Reclassification requests.	Letter
72	Tom Nevins	RE: Detailed comments regarding Land Reclassification requests.	Letter
73	Tom Nevins	RE: Loss of rural character.	Letter
74	Alison O'Sullivan Biologist, Suquamish	RE: Draft Kitsap County Comprehensive Plan Updates 2015	Letter

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	Tribe Fisheries Department		
75	William Palmer	RE: Comments on process, documents and his concerns.	Email
76	William Palmer	RE: Comments on process, documents and his concerns.	Email
77	William Palmer	RE: Comments on process, documents and his concerns.	Email
78	FSN, William Palmer LLC	RE: Response to Staff Report for FSN, Inc. (Curtis-Avery) Land Use Reclassification Comprehensive Plan Amendment-Urban Reserve to Urban Low-Permit No: 15 00641.	Letter
79	Chuck Bair, William Palmer LLC	RE: Bair Reclassification Request.	Letter
80	Schourup, William Palmer LLC	RE: Response to Staff Report For Schourup, LLC's UM to Urban Industrial Land Use Reclassification Comprehensive Plan Amendment/ Rezone- Permit No: 15 00739.	Letter
81	Edwards, William Palmer LLC	RE: Response to Staff Report for Edwards Rural Residential to Urban Low Land Use Reclassification Comprehensive Plan Amendment/ Rezone -Permit No: 15 00737.	Letter
82	Fox Harbor Rentals, William Palmer LLC	RE: Response to Staff Report For Fox-Harbor Rental's Land Use Reclassification Comprehensive Plan Amendment - Rural Protection to Rural Residential - Permit No: 15 00738.	Letter
83	Laurier Enterprises, William Palmer LLC	RE: Response to Staff Report For Laurier Enterprises Land Use Reclassification Comprehensive Plan Amendment	Letter
84	Tallman, William Palmer LLC	RE: Response to Staff Report For Tallman's Land Use Reclassification Comprehensive Plan Amendment - Rural Wooded to Rural Residential - Permit No: 15 00742.	Letter
85	Chuck Bair, William Palmer LLC	RE: Responses to Staff Report For Chuck Bair Land Use Reclassification Comprehensive Plan Amendment - Rural Residential 5 Ac. To Rural Industrial - Permit No: 15 00697.	Letter
86	Sedgwick Partners, William Palmer LLC	RE: Response To Staff Report For Sedgwick Partner Land Use Reclassification Comprehensive Plan Amendment- Urban Low to Highway Tourist Commercial- Permit No: 15 00735.	Letter
87	Robert Paulsen	RE: Permit Number 15 00722, Royal Valley LLC Reclassification Request In the 2012 comprehensive plan update, the County was under a mandate to revisit and reduce Urban Growth Areas. Even with these constraints, The Royal Valley LLC group proposed the conversion of part of a Central Kitsap rural area into a new UGA area, justified by the need for senior housing. Thus the Senior Living Homestead Zone was created. No justification was provided for the need for additional UGA capacity	NA

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		<p>other that for senior housing (55 years of age or older).</p> <p>In February of this year, I met with Royal Valley LLC , to discuss a site-specific amendment, for the Senior Living Homestead Zone, they intended to submit for the 2016 comprehensive plan update. During this meeting I was told by Ellen Ross-Cardoso that they wanted to delete the requirement that 90% of owners be 55 years of age or older. The reason given was that there was insufficient demand for housing for this age group.</p> <p>I don't believe the Royal Valley rezone would have been approved in 2012 absent the justification for the need for senior housing. If senior housing is not a viable project, than the original rezone justification is invalid.</p> <p>Deleting the requirement that 90% of owners be 55 years or age or older seems to me to be a bait and switch tactic that should not be allowed.</p>	
88	Linda Paralez	Re: Response to Staff Reports	Letter
89	Jim Reed	<p>Good morning Mr. Wolfe ~</p> <p>And thank you again for returning my call.</p> <p>As I mentioned in our conversation the property in question (3663, 3665, 3667 Chico Way NW, Bremerton 98312. Tax ID # 052401-3-101-2004.) had been zoned HTC for approximately 25 years plus. We made a major investment based on that zoning which allows us a very flexible tenant base and to my surprise without any notification it has been down zoned to RCO which has extremely limited uses.</p> <p>These limited uses do not allow for a type of tenant that would be suitable for the types of structures built on site, nor would the revenue stream from such a limited tenant base be adequate to meet the obligations of this development.</p> <p>After you review the circumstances could you please contact me back, so that I may move forward to address this issue</p> <p>Thank you again,</p>	NA
90	Jim Reed; Chico Business Park	RE: Comprehensive plan update comments.	Letter
91	Cynthia Rossi Lead Habitat Biologist, Point No Point Treaty Council	RE: Kitsap County Comprehensive Plan First Draft	Letter
92	Allison Satter, Senior Planner DCD, City of Bremerton	RE: Kitsap County 2016 Comprehensive Plan Update-City of Bremerton Comments.	Letter
93	Jill Seely	<p>South End of Port Orchard UGA: I am a property owner in the southeastern portion of Phillips road area. The southern most line of the UGA makes the most sense in Alternative 3. The areas south east of this line but included in Alt 1 and 2 are in reality not development friendly. They contain steep ravines, running water, bogs and swampy areas. It is a natural drainage area for several creeks and springs and general run-off from the greater Phillips Rd area. This is reflected by its Rural Protected status.</p>	NA

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		Putting this area in the UGA does not seem practical. Option 3 is the only good choice for this southeastern line.	
94	Jan Shandera	<p>Hi, I'm a relatively new resident in Port Orchard. I've just gone quickly, very quickly given its length, over the comp. plan. There's several things I'd like to ask, comment on, and or request. I am not sure this is the correct forum but I'll proceed.</p> <p>1) Regarding transportation: I find it very difficult to use public transportation here. For instance, to get to Seattle using a ferry I must drive 30 minutes to Bremerton, get there 30 minutes early, and then ride for an hour. I can drive to Seattle in half the time. When I get there I'm not stuck at the ferry terminal, either. It's frustrating that once you get there the monorail is still a good walk away. I live very close to the Southworth-Fautleroy ferry. If it would take us to Seattle that would be wonderful. But instead it drops us off somewhere south of the city where I don't understand anyone would want to go.</p> <p>2) In the interest of maintaining our rural character, as I see mentioned, I must say that I was shocked to see the enormous bill boards erected on Sedgwick Road near 16. They don't even belong on 16, in my opinion and I think they are ugly big city things that don't belong in our community. Can we avoid having any more of these monsters erected?</p> <p>3) Regarding promotion of active recreational opportunities (page 70) I have often wondered why we don't have a public pool somewhere in the area. We have a long hot summer. A while ago there was a newspaper article about the fact that Bremerton finds they need to maintain the quality of the fountain water for swimming by the ferry. Yes, people use it for a wading pool. I think this is an obvious demonstration of the fact that many people would enjoy a real pool in the area. We are surrounded by water, but I don't consider much of it to be accessible. Fresh water bodies all seem to have warning signs about parasites. Meanwhile, the water in the Sound is of questionable quality for swimming, especially for children, due to pollution.</p> <p>4) Lastly, restrooms. The skateboard park in Port Orchard has been hugely successful. I see on the signs that a real bathroom is planned. What happened? Those portables are pretty bad, especially for the younger children.</p>	NA
95	Richard Shattuck	Letter: RE: Comment on Comprehensive Plan Amendment for Silverdale Subarea	Letter
96	Richard Shaw	RE: Comments on the 2016-2026 Draft Comprehensive Plan regarding Tax Parcel Numbers 072302-2-022-2002 and 072302-2-024-2008	Letter
97	Dr. Sheila Shinberg	1st Choice- Option #3, 2nd Choice-Option #2 The real challenge for both Option #1 and 2 is that there is no infrastructure to support the density proposed, everything from traffic lights to pipes and wires for sewerage and water to roads. Two developer in Option #1 and 2 are unable to even pay their taxes. What does that mean for utility assessments? Option #3 makes the most sense all the way around.	NA
98	Doug Skrobut	RE: Detailed comments on all documents	Letter
99	Jon Michael Stoican	RE: Property Owner on Bethel Avenue, requesting no changes to the Urban Growth Boundaries in the Bethel Corridor.	Letter
100	Jim Walter Cornerstone	My comment is in reference to the zoning classification request by Cornerstone Alliance Church, permit number 15 00607. Cornerstone Church has been notified of	NA

#	Author Name	Comment, Letter or Letter Title	Letter
	Alliance Church	<p>the fact that, if their zoning request is approved, they will find themselves in non-conformity to the new Zoning ordinances. Under the proposed Comprehensive Plan, a church would not be allowed in a RI zoning classification, nor would it be allowed to obtain a Conditional Use Permit for that zoning. On behalf of the Church, I would like to explain our specific situation and ask that the Planners work to provide a solution that will benefit all, and still fulfill the objectives of the new Comprehensive Plan.</p> <p>After approximately 15 years in its present location, Cornerstone Alliance Church is planning to relocate. However, before we can relocate we need to sell our property and building. Because of unique location of the church, the building and property have been difficult to market to other churches. The church leadership ultimately determined that the property location made it ideal for Industrial zoning rather than Residential zoning, and were thankful for the invitation from the County to apply for zoning reclassification. Now that the church has been informed of the possibility of nonconformity under the new Comprehensive Plan, we recognize that we could be denied our request rather than be placed in this position by the County. I would ask that the Planners, then, create a caveat in the proposed Comprehensive Plan that would allow us to continue to use the property as a Church until the property transfers ownership. With this caveat, the church would be able to market its property to Industrial businesses until a buyer is found. Otherwise, we will be faced with the loss of rezoning costs and still have difficulties in marketing our facility to the right buyer. We believe this solution may yield a positive outcome for both the Church and for the County, in that it will ultimately provide more Industrial zoning in Kitsap County.</p> <p>Thank you for your consideration.</p>	
101	Mike Walton, Executive Director Kitsap Public Facilities District	<p>DCD/Comp Plan - My general comment is that there is not enough mention and emphasis on tourism or plans to support and encourage it into the future.</p> <p>- For those of us that live here, we don't see it as a tourist destination – but, look at the data - it is! Time to take advantage of that. - The branding as “The Natural Side of Puget Sound” has been particularly effective and should be continued and emphasized.</p> <p>- Most departments in the County are inward focused, not outward focused, so they don't make or include plans to attract visitors - Our plans have not generally acknowledged how visitors from outside can positively affect our income and resources</p> <p>Following are a number of sections of the Draft Comp Plan that I suggest a) modifying to include tourism (as the 3rd or 4th highest revenue generator in the County); b) restating some goals to include tourism as a focus or priority; c) restating some policies to include tourism as a primary or secondary intended outcome; and d) adding some Goals or Policies to properly prioritize tourism's importance in the Economic Development segment of the Plan. I may have some additional suggestions in the next couple of days. I hope that you will consider these suggested changes or additions in the cooperative spirit that they have been proposed,</p>	NA
102	Robert Waters	RE: Reallocating Commercial property from South Kitsap to Central and North Kitsap	Letter
103	Cheryl and Keith Webster	(Individual Site-specific Change) Our family is requesting a consideration of a site-specific zoning change for consistency and underlying Land Use based on Historic Family use of this land. The Land site in question is located in Hansville at the end of Buck Lake Road in section 21, Township 28 North, Range 2 East, on Lot 6215-D. - Map Included. Our request is to have the land designation changed from Rural	Letter

#	Author Name	Comment, Letter or Letter Title	Letter
		Wooded to Rural Residential to allow grandchild the opportunity to have the land. The land on Lost 6215-D is currently 1 dwelling on 15 acres. We would request the land be changed to 1-5 acre lot with dwelling and 2 5 acre wooded lots or 1-5 acre lot with dwelling and a 10 acre wooded lot. Thank you for your time and consideration. Very respectfully, Cheryl (daughter of land owner) and Keith Webster. (Right of Way Deeds to County included).	

6.2. Responses to Comments

Responses to comments are provided in Exhibit 6.1-1. Comments that state an opinion or preferences are acknowledged with a statement that the comment is noted. Comments that ask questions or request revisions to the Draft SEIS are provided with a response that either explains the approach of the SEIS analysis or offers clarifications. Letters with multiple comments are marked with a corresponding sub-number and follow this matrix.

Exhibit 6.2-1 Responses to Comments

Comment	Response
1. Ashbey, Bek	
1-1	Comment noted. Alternative 1 No Action retains the 2015 Urban Growth Area (UGA) boundary.
1-2	Kitsap County considered the request and retained the comment period. However, Board of County Commissioner Garrido and County staff attended work sessions with the Port Orchard City Council. Further, hearings on a staff recommended alternative were held in February 2016 to allow for more comment on UGA boundaries and land use designations.
1-3	Comment noted. See also the Preferred Alternative addressed in Final SEIS Chapter 2.
2. Ashby, William	
2-1	Comment noted. The referenced land use reclassification applications (15 00454 and 15 00475) were not carried forward for evaluation as separate requests. However, they were evaluated in the Comprehensive Plan Update as part of the Port Orchard UGA boundary alternatives. Alternative 1 No Action retains the property in the UGA. The Preferred Alternative removes the properties from the UGA and replaces Urban Low (UL) zoning with Rural Protection (RP).
3. Ashby, William	
3-1	Comment noted. See Response to 2-1.
Baldwin, Craig	
4-1	Comment noted. There is a vegetated undeveloped area abutting the parcel boundaries in the right of way; see Attachment 1. Across Viking Way there is a gas station. An undeveloped Rural Commercial (RCO) designated property exists to the east across Silverdale Way NW. See the March 1, 2016 Staff Report, Attachment 1, and Attachment 3: http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx .

Comment	Response
Best, Phil	
5-1	The comment is noted and forwarded to County decision makers. State information shows that between Bremerton and Seattle, it is possible to catch a number of salmon species including chum and sockeye. ⁶
5-2	The comment is noted and forwarded to County decision makers.
5-3	The comment is noted and forwarded to County decision makers.
5-4	The comment is noted and forwarded to County decision makers.
5-5	The comment is noted and forwarded to County decision makers.
5-6	The comment is noted and forwarded to County decision makers.
5-7	The comment is noted and forwarded to County decision makers.
Blaisdell, Laurel	
6-1	The property is outside the UGA and is not proposed for inclusion in the UGA. The subject property is 5 acres in size consistent with the zone. It is recommended that the commenter consult attorneys about the means by property may be passed on.
Boorman, Peter	
7-1	The comment is noted and forwarded to County decision makers.
Burke, Martha	
8-1	The comment is noted and forwarded to County decision makers. Project 62 of the TIP includes paving shoulders on Miller Bay Road/Augusta Avenue. The funding is identified for years 4-6 of the six year period.
Call, Roma (Port Gamble Sklallam Tribe)	
9-1	The comment is noted and forwarded to County decision makers. The Preferred Alternative is a blend of Alternatives 1 and 2. The UGA in total is reduced by 203 acres or 1%.
9-2	<p>The proposed Comprehensive Plan goals, policies, and plans address cultural resources. For example, the April 10, 2016 final draft includes the following policy: "Land Use Policy 21. Preserve and protect features of historic, archaeological, cultural, scientific and educational value or significance through coordination and consultation with the appropriate local, state and federal authorities, affected Indian tribes, and property owners, through non-regulatory means."</p> <p>Please also note that the Shoreline Master Program is considered part of the Comprehensive Plan. As a result of tribal input on Kitsap County's 2014 Shoreline Master Program update, a policy was adopted directing establishment of a more efficient method of gaining tribal input on cultural resources relative to development activity within the shoreline jurisdictional area, where a large percentage of mapped cultural resources occur. The County subsequently created a publicly accessible data base to implement this policy, and encourages the tribes and other interested parties to utilize the system to identify potential impacts before they occur.</p> <p>The SEIS for the 2016 Comprehensive Plan Update does not repeat analysis of cultural resources from the 2006 EIS or the Gorst EIS that were adopted together with this Comprehensive Plan Update 2036 SEIS. However, that analysis and mitigation measures are still applicable.</p>

⁶ See: <http://wdfw.wa.gov/fishing/washington/MarineArea/10010/>.

Comment	Response
9-3	Comment noted. The Draft SEIS addresses climate change and greenhouse gas emissions including mitigation measures. Strategies proposed for the Environment chapter of the Draft Plan establish a process for adaptive management in response to future changes moving forward (strategy 6).
9-4	<p>The Capital Facility Plan addresses 6-year and 20-year growth and incorporates system plans by special districts. Over the 20-year period more detailed 6-year plans would be updated by service providers, and the County would accordingly update the Capital Facility Plan.</p> <p>Kitsap County Public Works currently hosts annual meetings with local Tribes regarding planned capital improvement projects requiring Hydraulic Project Approvals. Public Works also solicits annual input on updates to the 6-year Transportation Improvement Program (TIP). The commenter is encouraged to contact the Department of Public Works for further information regarding notification of annual meetings and opportunities for input (360-337-5777), or sign up directly for electronic notifications on a wide range of County topics directly via Kitsap County's main web page (www.kitsapgov.com).</p>
Cardwell, James and Sergia	
10-1	Each UGA is sized according to its growth allocations. No growth is reallocated from South to Central or North Kitsap. The Preferred Alternative offers an alternative approach to commercial designations along the Bethel Corridor. See Final SEIS Chapter 2.
Curley, Tom	
11-1	The comment is noted and forwarded to County decision makers.
11-2	The comment is noted and forwarded to County decision makers. A complete streets study has been conducted in Kingston by the Public Works Department. It is due for completion in 2016.
11-3	The comment is noted and forwarded to County decision makers. See Response to Comment 11-2.
Davidson, Jeff	
12-1	<p>The comment is noted and forwarded to County decision makers.</p> <p>The Draft Capital Facilities Plan addresses capital facilities including community centers in all regions of the county. The Kingston Community Center will be relocated due to the realignment of state route 104, and will be re-built with private funding; it is not listed in the Draft Capital Facilities Plan as it is not a publicly funded project. Expansion or replacement of the Givens Community Center is anticipated in years 2022 and 2036, with costs and revenue sources to be determined. In addition is possible that there will be a South Kitsap Community Center developed in partnership between the YMCA, City of Port Orchard, and Kitsap County. A market analysis is pending on this potential center.</p> <p>The County has adopted a non-motorized facility plan in 2013. A committee helps guide the implementation. See this page: http://www.kitsapgov.com/pw/nonmotor.htm.</p>
DeCosta, Chuck and Carol	
13-1	The comment is noted and forwarded to County decision makers.
DeCosta, Chuck	
14-1	The comment is noted and forwarded to County decision makers.
14-2	The comment is noted and forwarded to County decision makers.
14-3	Consistent with Growth Management Act (GMA) goals for property rights, all property is given a reasonable use of property. Permit procedures offer public comment opportunities and due process for applicants.

Comment	Response
14-4	The comment is noted and forwarded to County decision makers. Critical areas regulations are required by GMA; in any case federal regulations require the protection of wetlands that help filter water and provide habitat. The regulations offer variance procedures for unique cases to assist property owners. The Kitsap County Health Department and Washington Department of Ecology enforce septic system and water quality regulations.
14-5	The comment is noted and forwarded to County decision makers. Consistent with federal and state laws, Kitsap County enacts regulations for public safety and welfare of the community. Where appropriate, nonconforming uses, also commonly known as “grandfathered” uses, are exempted unless the use is expanded or changed.
DeCosta, Chuck and Carol	
15-1	<p>Cellular phone service, high speed internet, and digital TV are all privately provided utility services, as described in the Draft SEIS Section 3.3.10, Energy and Telecommunications. Private providers make decisions about where and when to add more cellular towers.</p> <p>Because Seabeck is not located in an UGA, it would see less population and employment growth during the Comprehensive Plan planning period (through 2036), under all Alternatives. Less growth could make new cellular towers less cost-effective for private providers; however cell towers are placed also based on coverage needs of the provider and customers.</p>
DeCosta, Chuck and Carol	
16-1	<p>The comment is noted and forwarded to County decision makers. Kitsap County offers notification opportunities for multipole departments and topics – please see this page:</p> <p>https://public.govdelivery.com/accounts/WAKITSAP/subscriber/new</p>
Earl, Mary	
17-1	The comment is noted and forwarded to County decision makers.
17-2	The comment is noted and forwarded to County decision makers.
17-3	The comment is noted and forwarded to County decision makers.
17-4	The comment is noted and forwarded to County decision makers. The plan is part of the Comprehensive Plan and is intended to be consistent with that plan horizon year of 2016-2036. If annexation occurs sooner, that would not be inconsistent with the plan.
17-5	The Capital Facilities Plan addresses the need to replace the community center in Silverdale. The County is currently discussing with multiple public and private stakeholders on a future replacement of the Community Center and redevelopment of the Campus as a whole through a public-private partnerships. Feasibility assessments for development and associated costs are intended to be conducted in 2016. Demolition is shown in the capital project list in 2016.
17-6	The comment is noted and forwarded to County decision makers.
17-7	The comment is noted and forwarded to County decision makers.
17-8	The comment is noted and forwarded to County decision makers.
17-9	The comment is noted and forwarded to County decision makers.
17-10	The comment is noted and forwarded to County decision makers.
17-11	The comment is noted and forwarded to County decision makers.
17-12	The comment is noted and forwarded to County decision makers.

Comment	Response
17-13	The comment is noted and forwarded to County decision makers.
17-14	The comment is noted and forwarded to County decision makers.
17-15	The comment is noted and forwarded to County decision makers. Kitsap Transit has been planning for the Silverdale Transit Center. See information at their website: http://www.kitsaptransit.com/agency-information/planning .
17-16	The comment is noted and forwarded to County decision makers.
17-17	The comment is noted and forwarded to County decision makers.
17-18	The comment is noted and forwarded to County decision makers.
17-19	The comment is noted and forwarded to County decision makers.
17-20	The comment is noted and forwarded to County decision makers.
Eber, Ron	
18-1	Comment noted. Planning Commission meetings are open to the public, as are Board of County Commissioner (BOCC) meetings. Please refer to the City's website for the schedule of upcoming meetings and public hearings on the Comprehensive Plan Update.
18-2	Comment noted. While many Comprehensive Plan goals and policies would be the same regardless of the alternative due to the common framework of the County's vision, GMA goals and Countywide Planning Policies, some differ depending on the UGA boundaries, land use plan changes, and growth targets. Further, goals and policies are being amended based on public comment.
18-3	Comment noted. Several of the staff reports and recommendations for the site-specific reclassification requests state that an unmet need has not been identified and is a factor in the recommendations.
18-4	The comment is noted and forwarded to County decision makers. For the most part, the Preferred Alternative excludes changes to Rural classifications. The few that are proposed for approval in the Preferred Alternative are based on unique circumstances, such as the present altered conditions, lot pattern and abutting conditions.
Ely, Charles	
19-1	The comment is noted and forwarded to County decision makers. The Land Use Element addresses rural and resource land use. The County is also considering Transfer of Development Rights (TDR) provisions to further protect agricultural uses. See Draft SEIS Appendix G, Reasonable Measures. Regarding lands for shooting sports, the locations where such uses are allowed are addressed in the County Code. See Responses to Comment 14-5.
Ganer, Susan	
20-1	Currently applied future land use designations and zoning classifications can be found at an individual parcel scale at the County Assessor website: https://psearch.kitsapgov.com/webappa/ . Proposed maps showing alternatives for County future land use designations and zoning classifications (both complete maps and "changes only" maps) are available at the County's dedicated website: http://compplan.kitsapgov.com/Pages/home.aspx . Please also contact Department of Community Development Staff for individual assistance: 360.337.5777 or email to help@kitsap1.com .

Comment	Response
Geiselman, Dean and Judy	
21-1	The comment is noted and forwarded to County decision makers. The Preferred Alternative excludes the property at 5879 SE Phillips Rd from the Port Orchard UGA. See Preferred Alternative maps in Final SEIS Chapter 2, or online at http://compplan.kitsapgov.com/Pages/home.aspx .
Gillespie, Ron L.	
22-1	The comment is noted and forwarded to County decision makers.
22-2	The comment is noted and forwarded to County decision makers.
22-3	The comment is noted and forwarded to County decision makers.
22-4	The comment is noted and forwarded to County decision makers. The proposed UGA boundaries for the Preferred Alternative do not result in a net expansion of UGA boundaries. See Final SEIS Chapter 2.
22-5	The comment is noted and forwarded to County decision makers. Sign code amendments are not part of the Comprehensive Plan Update 2036 work program, but can be considered in the future as part of implementing actions.
22-6	The comment is noted and forwarded to County decision makers.
22-7	The comment is noted and forwarded to County decision makers.
22-8	The comment is noted and forwarded to County decision makers.
22-9	The comment is noted and forwarded to County decision makers. South of Bucklin Hill Road and west of Tracyton Boulevard is still within the Silverdale UGA, but the NW Barker Creek Corridor and points south west of the Central Kitsap UGA are excluded from the UGA.
22-10	The comment is noted and forwarded to County decision makers.
22-11	The comment is noted and forwarded to County decision makers.
22-12	The comment is noted and forwarded to County decision makers.
22-13	The comment is noted and forwarded to County decision makers.
22-14	The comment is noted and forwarded to County decision makers.
22-15	The comment is noted and forwarded to County decision makers.
22-16	The comment is noted and forwarded to County decision makers.
22-17	The comment is noted and forwarded to County decision makers.
22-18	The comment is noted and forwarded to County decision makers.
22-19	The comment is noted and forwarded to County decision makers.
22-20	The comment is noted and forwarded to County decision makers.
22-21	The comment is noted and forwarded to County decision makers.
22-22	The comment is noted and forwarded to County decision makers. The County is required to consider best available science in its critical areas regulations, and that includes the State of Washington Department of Ecology (Ecology) guidance on including avoiding, minimizing, and mitigating impacts. See: http://www.ecy.wa.gov/programs/sea/wetlands/bas/ .

Comment	Response
22-23	The comment is noted and forwarded to County decision makers. The Shoreline Master Program has been developed and adopted by the County and Ecology, and is intended to meet State guidelines on docks and other in-water or upland development.
22-24	The comment is noted and forwarded to County decision makers. In addition to requiring the SEPA Checklist consistent with State rules at WAC 197-11, development applications are subject to County code requirements for transportation impact analysis, critical areas reports, and other requirements depending on the nature of the project.
22-25	The comment is noted and forwarded to County decision makers.
22-26	The comment is noted and forwarded to County decision makers. Flexible standards is intended to reference a suite of development practices designed to minimize or avoid impacts to natural systems, such as clustering, low impact development, etc.
22-27	The comment is noted and forwarded to County decision makers. Please refer to the Countywide Planning Policies (CPPS) where growth is allocated consistent with the GMA. The Comprehensive Plan Update does not result in a net increase of the UGA.
22-28	The comment is noted and forwarded to County decision makers.
22-29	The comment is noted and forwarded to County decision makers. The Comprehensive Plan policies provide direction, but the development regulations carry out the policy direction and are more specific and directive.
22-30	The comment is noted and forwarded to County decision makers.
22-31	Examples to "Remove regulatory barriers to alternative housing models for people experiencing homelessness" could include addressing small unit sizes, parking standards, or other code requirements, which would be determined during the code implementation phases following the Comprehensive Plan Update.
22-32	By this policy, the County would intend to review housing types allowed in the development regulations (building code, zoning code) and consider others that are missing or have limited zones where they are allowed.
22-33	The comment is noted and forwarded to County decision makers.
22-34	The comment is noted and forwarded to County decision makers.
22-35	The comment is noted and forwarded to County decision makers. Access could be by transit or other means.
22-36	The comment is noted and forwarded to County decision makers.
22-37	The comment is noted and forwarded to County decision makers.
22-38	The comment is noted and forwarded to County decision makers.
22-39	The comment is noted and forwarded to County decision makers.
22-40	The comment is noted and forwarded to County decision makers.
22-41	The comment is noted and forwarded to County decision makers.
22-42	The comment is noted and forwarded to County decision makers.
22-43	The comment is noted and forwarded to County decision makers. Any technical deviations are based on unique local circumstances and documentation by an engineer subject to County review.
22-44	The comment is noted and forwarded to County decision makers.

Comment	Response
22-45	The comment is noted and forwarded to County decision makers. The policy cites consistency with GMA and other laws. GMA requires a public participation process for plan updates and amendments.
22-46	The comment is noted and forwarded to County decision makers.
22-47	The comment is noted and forwarded to County decision makers. Under GMA cities are the primary providers of urban services and counties are the primary provider of regional and rural services. Thus, there is an expectation that over the long term areas in the UGA would be part of a city. However, incorporation or annexation is largely a property owner and voter led process, and cannot be predicted.
22-48	The comment is noted and forwarded to County decision makers. Please see the capital facility plan for proposed levels of service and facilities designed to serve Silverdale and other UGAs.
22-49	The comment is noted and forwarded to County decision makers.
22-50	The comment is noted and forwarded to County decision makers. See Response to Comment 22-47.
22-51	The comment is noted and forwarded to County decision makers.
22-52	The comment is noted and forwarded to County decision makers.
22-53	The comment is noted and forwarded to County decision makers.
22-54	The comment is noted and forwarded to County decision makers.
Gordon, Brittany (Washington Department of Fish and Wildlife (WDFW) Habitat Biologist)	
23-1	<p>The comment is noted and forwarded to County decision makers. The requested policy amendment would require the County to eventually provide resources for a complete inventory that would likely be a significant expense.</p> <p>The County uses the best available information from a variety of sources. The shorelines have been inventoried per the Shoreline Management Act and implementing guidelines, and will be subject to periodic review and a cumulative impacts analysis. The County uses the best available maps including from state agencies such as WDFW (e.g. priority habitats and species). At a site-specific level development applicants provide new information beyond published sources and that information is folded into County GIS layers.</p>
23-2	The comment is noted and forwarded to County decision makers.
23-3	The comment is noted and forwarded to County decision makers.
23-4	The comment is noted and forwarded to County decision makers.
23-5	The comment is noted and forwarded to County decision makers.
23-6	The comment is noted and forwarded to County decision makers. Please see Final SEIS Chapter 2 for a description of the Preferred Alternative and its comparison to Alternative 2 and other alternatives.
23-7	The comment is noted and forwarded to County decision makers. Under the No Action Alternative, the area in question is Business Center. Please see Final SEIS Chapter 2 for a description of the Preferred Alternative. A portion of the Business Center zone along NE Trigger is proposed for reduction near the Bangor Base.
23-8	The comment is noted and forwarded to County decision makers. Please see Final SEIS Chapter 2 for a description of the Preferred Alternative and its comparison to Alternative 2 and other alternatives. Urban Restricted (UR) is applied to the area in East Bremerton along Enetei Beach.
23-9	The comment is noted and forwarded to County decision makers. 15-00522 is related to the Ueland Tree Farm with a mining operation that has been studied in an EIS to which WDFW has been an agency with jurisdiction. The Preferred Alternative proposes a change of Urban Reserve (URS) to Rural Protection (RP), and does not

Comment	Response
	propose the Rural Industrial (RI). See the March 1, 2016 Staff Report: http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx .
23-10	The comment is noted and forwarded to County decision makers. Application 15-00607 is related to the Cornerstone Alliance property. The Preferred Alternative retains the Rural Residential (RR) designation. See the March 1, 2016 Staff Report: http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx .
23-11	The comment is noted and forwarded to County decision makers. The Preferred Alternative does not include the requested change to Rural Commercial (RCO) in George's Corner requested by application 15 00378. In order to be consistent with the adopted LAMIRD plan, and to correct the noted split zones, the Preferred Alternative recommends parcel 272702-2-047-2003 be rezoned entirely to Rural Protection (RP) and the remaining residential portion of parcel 272702-2-046-2004 be RP.
23-12	The comment is noted and forwarded to County decision makers. Regarding 15-00689, the request for a change from Rural Protection (RP) to Rural Commercial (RCO) is not included in the Preferred Alternative.
23-13	The comment is noted and forwarded to County decision makers. Site 15-00701: The Preferred Alternative includes the proposed change to Industrial. However, under any use, critical areas regulations would apply.
23-14	The comment is noted and forwarded to County decision makers. The referenced application 15-00380 to request a change from Urban Restricted (UR) to Highway Tourist Commercial (HTC) was withdrawn.
23-15	The comment is noted and forwarded to County decision makers. The properties in application 15-00686 are included in the Preferred Alternative as Rural Protection (RP) instead of Rural Wooded (RW). The original request was to change to Rural Residential (RR), but the application was amended, and is included in the Preferred Alternative as RP.
23-16	The comment is noted and forwarded to County decision makers. Site 15-00714: The property is proposed for Rural Residential (RR) in the Preferred Alternative instead of Rural Wooded (RW). The staff report notes that there could be a reduction in forest cover under present or proposed designations; however, the use of low impact development techniques could allow added residences while retaining natural soils and storm water and minimizing the reduction in forest cover; the County applies stormwater management requirements that promote low impact development standards. The tributary stream would be protected by critical areas regulations.
Gormanous, Kathy	
24-1	The comment is noted and forwarded to County decision makers. The Preferred Alternative includes the Royal Valley LLC reclassification request as Urban Cluster Residential. The allowable uses of Senior Living Homestead Zone (SLHZ) will be applied to the Urban Cluster Residential (UCR) zone, and requirements for master planning and allowed uses will be equivalent.
Gormanous, Kathy	
25-1	The comment is noted and forwarded to County decision makers.
Graf-Hoke, Patricia	
26-1 ED and Tourism	The comment is noted and forwarded to County decision makers.
27-1 Transportation	Comment noted. Among new policies addressing tourism, a Silverdale Regional Center (where the County's highest traffic counts typically occur) policy addresses adequate transportation infrastructure for commercial tourist activity.

Comment	Response
28-1 Land Use	The comment is noted and forwarded to County decision makers.
29-1 ED and Tourism	The comment is noted and forwarded to County decision makers.
30-1 Parks and Open Space	The comment is noted and forwarded to County decision makers.
31-1 Subarea / Neighborhood Plans	The comment is noted and forwarded to County decision makers.
Hall, Scott	
32-1	The comment is noted and forwarded to County decision makers.
32-2	The comment is noted and forwarded to County decision makers.
32-3	The comment is noted and forwarded to County decision makers.
32-4	The comment is noted and forwarded to County decision makers.
32-5	The comment is noted and forwarded to County decision makers.
32-6	The comment is noted and forwarded to County decision makers.
32-7	The comment is noted and forwarded to County decision makers.
32-8	The comment is noted and forwarded to County decision makers.
32-9	The comment is noted and forwarded to County decision makers.
32-10	The comment is noted and forwarded to County decision makers. The Comprehensive Plan sets policies that then can be implemented by regulations and programs. Please also note the County is considering adoption of amended Transfer of Development Rights (TDR) Regulations to promote agricultural land conservation. See Draft SEIS Appendix G, Reasonable Measures.
Harless, Jerry	
33-1	<p>The 30-day comment period for the Draft SEIS is consistent with SEPA Rules at WAC 197-11-455(6) and -510. Public hearings are not required during the comment period. All comments during the 30-day comment period are included in this Final SEIS, and responses are provided. The Comprehensive Plan including the Capital Facility Plan were the subject of many Planning Commission and Board of County Commissioner meetings and hearings from December 2015 to April 2016, at the time of this writing.</p> <p>The County is developing code amendments to implement the Comprehensive Plan. See a summary in Draft SEIS Exhibit 2.6-15. Draft Development Regulation Amendments. As the code amendments are ready for public review additional opportunities for comments will be provided.</p>
33-2	The comment is noted and forwarded to County decision makers. The County is developing concurrent zoning code and map changes with the Comprehensive Plan to ensure consistency. See also Response to Comment 33-1.
33-3	The County's Buildable Lands Report methodology was upheld in Growth Management Hearings Board Final Decision and Order in Case No. 15-3-0005 (Harless IV). The latest Buildable Lands Report (BLR) was prepared in 2014 and comments were solicited through 2015. For the purposes of this document, the report is called the 2014 BLR.

Comment	Response																														
	<p>The 2014 BLR did not adjust targets that are contained in the Countywide Planning Policies (CPPs). See also the Draft SEIS Appendix A for a description of the Silverdale correction to the base year figures in the CPPs.</p> <p>The 2014 BLR assessed 2012 population capacity in relation to targets between <u>2010-2036</u> (Table 4u-9 and Appendix B). The Draft SEIS Alternatives compare 2012 capacity to targets adjusted for a <u>2012</u> base year. The approach to capacity estimates was essentially the same and the results are very similar as shown below for unincorporated UGAs.</p> <p style="text-align: center;">Comparison of Buildable Land Capacity Results for Unincorporated UGAs: 2014 Buildable Lands Report and Draft SEIS No Action Alternative</p> <table border="1" data-bbox="402 552 1295 968"> <thead> <tr> <th data-bbox="402 552 638 705">Unincorporated UGA</th> <th data-bbox="638 552 802 705">2014 BLR Capacity: 2012</th> <th data-bbox="802 552 966 705">Surplus/ Deficit 2010-2036 Target</th> <th data-bbox="966 552 1130 705">2015 Draft SEIS No Action Capacity</th> <th data-bbox="1130 552 1295 705">Surplus/ Deficit 2012-2036 Target</th> </tr> </thead> <tbody> <tr> <td data-bbox="402 705 638 758">Bremerton UGA</td> <td data-bbox="638 705 802 758">4,347</td> <td data-bbox="802 705 966 758">334</td> <td data-bbox="966 705 1130 758">4,350</td> <td data-bbox="1130 705 1295 758">378</td> </tr> <tr> <td data-bbox="402 758 638 810">Port Orchard UGA</td> <td data-bbox="638 758 802 810">6,297</td> <td data-bbox="802 758 966 810">-62</td> <td data-bbox="966 758 1130 810">6,320</td> <td data-bbox="1130 758 1295 810">210</td> </tr> <tr> <td data-bbox="402 810 638 863">Central Kitsap UGA</td> <td data-bbox="638 810 802 863">6,557</td> <td data-bbox="802 810 966 863">-207</td> <td data-bbox="966 810 1130 863">6,398</td> <td data-bbox="1130 810 1295 863">-444</td> </tr> <tr> <td data-bbox="402 863 638 915">Silverdale UGA</td> <td data-bbox="638 863 802 915">7,647</td> <td data-bbox="802 863 966 915">-1,132</td> <td data-bbox="966 863 1130 915">7,644</td> <td data-bbox="1130 863 1295 915">-1,079</td> </tr> <tr> <td data-bbox="402 915 638 968">Kingston UGA</td> <td data-bbox="638 915 802 968">2,868</td> <td data-bbox="802 915 966 968">-64</td> <td data-bbox="966 915 1130 968">2,823</td> <td data-bbox="1130 915 1295 968">-103</td> </tr> </tbody> </table> <p>Note: Poulsbo City Limits/UGA addressed together – see Draft SEIS for results of capacity and targets with and without the combined Poulsbo City Limits/UGA across alternatives. Overall direction is the same with/without the Poulsbo City/UGA results.</p> <p>The County’s responsibility is to size unincorporated UGAs, whereas cities are responsible for growth capacity in their city limits. Application of the BLR method by the County to the Unincorporated UGAs shows the following:</p> <ul style="list-style-type: none"> • Alternative 1 No Action Alternative is under capacity for assigned targets in some UGAs. Under Alternative 1, unincorporated UGAs collectively would be below Countywide Planning Policy (CPP) population targets by 8%. • Alternative 2 includes a UGA reduction and upzones that show unincorporated UGAs are 8% below CPP targets. • Alternative 3 would show a net increase in UGA lands and would have unincorporated UGA capacity at 4% below targets. • The Preferred Alternative does not result in a net UGA expansion compared to Alternative 1 No Action. The Preferred Alternative would size unincorporated UGAs 6% below targets. See Final SEIS Chapter 2. 	Unincorporated UGA	2014 BLR Capacity: 2012	Surplus/ Deficit 2010-2036 Target	2015 Draft SEIS No Action Capacity	Surplus/ Deficit 2012-2036 Target	Bremerton UGA	4,347	334	4,350	378	Port Orchard UGA	6,297	-62	6,320	210	Central Kitsap UGA	6,557	-207	6,398	-444	Silverdale UGA	7,647	-1,132	7,644	-1,079	Kingston UGA	2,868	-64	2,823	-103
Unincorporated UGA	2014 BLR Capacity: 2012	Surplus/ Deficit 2010-2036 Target	2015 Draft SEIS No Action Capacity	Surplus/ Deficit 2012-2036 Target																											
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Silverdale UGA	7,647	-1,132	7,644	-1,079																											
Kingston UGA	2,868	-64	2,823	-103																											
33-4	See Response to Comment 33-3. The Preferred Alternative would size unincorporated UGAs 6% below targets. The Preferred Alternative does not result in a net UGA expansion compared to Alternative 1 No Action; rather it reduces the UGA area by 1%.																														
33-5	See Response to Comment 33-3 and 33-4. The County is considering additional reasonable measures to address inconsistencies in actual versus planned growth. See Draft SEIS Appendix G and Final SEIS Appendix B. Examples of measures under the Preferred Alternative include a net reduction in Silverdale UGA boundaries while increasing the growth capacity of the Silverdale Regional Growth Center.																														
33-6	The comment is noted and forwarded to County decision makers.																														

Comment	Response
33-7	The comment is noted and forwarded to County decision makers. The Growth Management Hearings Board found Kitsap County needed to correct the 2014 BLR to report annual monitoring. The Draft SEIS Appendix G shows year by year results for permit and plat densities as well as evaluates adopted reasonable measures and identifies new reasonable measures for consideration.
33-8	The comment is noted and forwarded to County decision makers.
33-9	The County is developing code amendments to implement the Comprehensive Plan. See a summary of Draft SEIS Exhibit 2.6-15. Draft Development Regulation Amendments. The County needed the direction of a preferred alternative in order to prepare detailed changes, available in April 2016. As the code amendments are ready for public review additional opportunities for public comments have been provided. However, key regulatory concepts are stated in the Draft and Final SEIS, and are largely related to the land use plan and zoning changes that were analyzed in the SEIS Alternatives (e.g. removal of the Urban Reserve and Mixed Use Zones, potential changes to combine Commercial zones, changes to the Senior Living Homestead zone per a reclassification request, etc.). For code sections that are pending update, Kitsap County will assess whether additional SEPA analysis is warranted given the nature of the regulation updates.
33-10	<p>The County is responsible for sizing unincorporated UGAs. Cities are responsible for growth capacity in their city limits. The County has sized such UGAs collectively to be below the designated targets as shown in Response to Comment 33-3. Further, the Unincorporated UGA capacity results are very similar between the 2014 BLR and the Draft SEIS No Action Alternative as shown in Response to Comment 33-3 above.</p> <p>Though the focus of SEIS evaluation is on unincorporated lands (see Fact Sheet – Location or Draft SEIS Section 2.3), the Draft SEIS Alternatives study the impacts of expected city growth collectively with unincorporated UGA growth.</p> <p>For cities and UGAs collectively the 2014 BLR estimated a land capacity for 86,237 persons. The Draft SEIS Alternatives assumes that cities and UGAs would grow collectively by up to 62,000 persons for purposes of studying cumulative impacts. The difference is not with Unincorporated UGAs but with city limit assumptions.⁷ City limit boundaries are not sized in the same way as unincorporated UGAs are sized. Cities may plan for expected growth rather than the full capacity for growth within their city limits. Accordingly, the Draft SEIS Alternatives each have growth assumptions for the cities generally including adopted plan growth assumptions or assuming growth targets plus 5% (see Draft SEIS Appendix B). Cumulative growth assumptions are similar to the assumptions of the 2006 EIS and 2012 SEIS. Please see Final SEIS Chapter 5 for clarifications to properly state the Alternative countywide growth assumptions.</p> <p>Though city limits are not “sized” under GMA, Kitsap County has considered the sizing of Unincorporated UGAs in light of city capacities. Kitsap County has worked with Port Orchard to create a smaller unincorporated UGA in consideration of its city limit capacity. Thus the Preferred Alternative shows a Port Orchard UGA that is 25% smaller than the CPP population target. Similarly, Kitsap County has not increased the Bremerton UGA for land capacity purposes – the County has limited any adjustments to Bremerton’s UGA to add in city-owned watershed land and less than 5 acres of urban lots in the West Bremerton UGA; the Bremerton UGA is within 1% of its</p>

⁷ The difference in countywide growth numbers between the 2014 Buildable Lands Report (BLR) and SEIS Alternatives is primarily with the City of Bremerton. The City had a land capacity estimate of about 34,198 persons in the 2014 BLR (more recently updated to be 32,446 persons with the City’s more recent Comprehensive Plan Update efforts). The relatively large capacity compared to its 2012-2036 target of 12,367 is a result of the City’s focus on dense mixed use centers that rely on redevelopment of already urban sites that are more difficult to achieve and dependent on market forces. The City’s planning assumption is about 13,800 similar to its 2004 Comprehensive Plan and the County’s Alternative 1 No Action assumption for the City. That primarily accounts for the 20,000 person difference.

Comment	Response
	<p>growth target. Poulsbo UGA is not changing with this 2016 Update and is within 5% of its UGA target. Bainbridge Island city limit boundaries are island-wide; it does not have a UGA.</p>
<p>33-11</p>	<p>Please see Draft SEIS Appendix G. While the Reasonable Measures interviewees included County employees involved in permitting, and developers who develop projects in the County, the list of interviewees also included business owners (Doctors Clinic, Kitsap Mall), non-County agencies (Kitsap Transit), a farmer (Mr. Darnall), and a West Sound Conservation Council member (Mr. Nevins). The Suquamish Tribe was contacted but declined to participate in the interviews.</p> <p>The Draft Reasonable Measures analysis in Draft SEIS Appendix G was subject to public comment including the commenter's letter.</p>
<p>33-12</p>	<p>The Draft SEIS provides a high level summary of the 2014 BLR and the Draft Reasonable Measures analysis in Appendix G, where a more complete evaluation identifies areas of effectiveness and areas of ineffectiveness, as well as potential reasonable measures to consider.</p> <p>The 2015 Draft SEIS Appendix G evaluates the 35 already adopted reasonable measures and then evaluates seven future measures (amended, new) in terms of the potential benefits of amendments, example jurisdictions that use these measures and evaluation of each measure's effectiveness. This approach was designed to fulfill the Board's direction in 2007. Per <i>Suquamish Tribe et al. v. Kitsap County</i>, CPSGMHB No. 07-3-0019c, FDO (8/15/2007) a reasonable measures evaluation should contain "a description, potential benefits, jurisdictions using the measure, and ...the effectiveness of the measure."</p> <p>After the publication of the Draft SEIS, the Growth Management Hearings Board has required the County to address reasonable measures to a greater degree in its 2014 BLR. The Board declined to rule on the reasonableness of either the current BLR list of reasonable measures or the proposed measures under SEPA review as the County is in the process of adopting its Comprehensive Plan Update.</p> <p>The 2015 Draft SEIS Appendix G provides analysis that would meet the level of information that the Board has required be included in the 2014 BLR: "(a) a list of currently-adopted reasonable measures, with perhaps a summary of monitoring data as to their effectiveness, and (b) suggested additional measures for discussion, preferably with a brief notation as to the particular inconsistency each measure is hoped to address."</p>
<p>33-13</p>	<p>The quoted language from the Draft SEIS indicates that several reasonable measures have been effective per the evaluation in Appendix G; however the Draft SEIS does <i>not</i> state that all reasonable measures have been effective. On the contrary, the Draft SEIS Appendix G offers changes to reasonable measures in order to better meet growth management goals.</p> <p>The commenter is directed to the 2015 Draft SEIS Appendix G where Exhibit 37 identifies either retaining, improving, or removing the 35 existing reasonable measures. Alternative 1 No Action, by its definition, would not make changes to existing plans or regulations and would not implement these recommendations for changes. However, Alternatives 2 and 3 and the Preferred Alternative would implement such measures; see Appendix B of this Final SEIS regarding reasonable measures proposed with the Preferred Alternative.</p> <p>Some of the 35 adopted reasonable measures have been effective, such as mandating minimum densities and increasing urban residential densities (see Draft SEIS Appendix G, Exhibit 21): "Comparing residential densities before and after 2006 reveals an overall increase since reasonable measures were adopted in the 2006 Comprehensive Plan. Average permitted gross residential density from 2002 to 2006 was 3.89 units per acre. From 2007 to 2012 the average density was 4.95 units per acre. This increase in gross density is an indicator that reasonable measures have been successful in accommodating more single-family housing growth within UGAs on a per-acre basis."</p>
<p>33-14</p>	<p>Please see Draft SEIS Appendix G Section 3.2 regarding the reduction of permits on legacy lots and lessening production of rural lots. Also see Section 4.1 of the Appendix on increasing urban densities.</p>

Comment	Response
33-15	The Draft SEIS summarizes the analysis of reasonable measures and refers to the analysis in Draft SEIS Appendix G made available simultaneous with the Draft SEIS in order to allow for public comment and to provide information useful in developing amended or new reasonable measures.
33-16	The comment is noted. The County has focused on making UGAs more attractive places for development, and over time the permits on legacy lots has lessened, and rural subdivisions have slowed. See Draft SEIS Appendix G Section 3.2.
33-17	Kitsap County evaluated ways to discourage development of legacy lots The Draft SEIS and the associated Draft SEIS Appendix G provide options and examples to consider approaches to development of legacy lots. See Final SEIS Appendix B for Reasonable Measures associated with the Preferred Alternative.
33-18	In Appendix G on page 70, the use of a maximum lot size is described in terms of potential effectiveness, where an upper bound lot size is identified. Further, the recommendation is that the use of maximum lot size could be considered as part of the 2016 Comprehensive Plan Update development regulations update. See Final SEIS Appendix B for Reasonable Measures associated with the Preferred Alternative.
33-19	See Response to Comment 33-17. The commenter notes that Health Department requirements could influence different owners to cooperate to aggregate properties. That could still occur today as Health Department standards would still require minimum lot sizes for septic systems. See Final SEIS Appendix B for Reasonable Measures associated with the Preferred Alternative.
33-20	Parcel reconfiguration does not allow any net increase in density, and is not intended to result in a need for urban services. It is another option under consideration. The commenter's preference for lot aggregation is noted and forwarded to County decision makers.
33-21	<p>The Draft SEIS provides an evaluation of alternatives and elements of the environment. To assist with the evaluation of alternatives designed to meet growth management goals Draft SEIS Appendix G Reasonable Measures was prepared.</p> <p>The County will identify reasonable measures in its Comprehensive Plan Update and its amendment of the 2014 BLR per the Growth Management Hearings Board decision.</p>
33-22	<p>The Capital Facilities Plan sewer section identifies the necessary improvements to both serve new growth and extend sewer to existing areas under all studied alternatives. The timing of extensions will be based on demand for service.</p> <p>The cost and revenue analysis shows that <i>dedicated</i> capital funds for all County facility types (e.g. roads, parks, and sewer) are limited and thus the County must find other funding sources and has done so in the past and will do so in the future. For sewer this could include developer extensions, rates, etc. For each capital project identified in the planning period the sources of revenue are identified. Thus, the level of growth in the UGAs is accounted in the planned improvements, and revenues have been identified for each capital project.</p>
Harris, Steven	
34-1	The comment is noted and forwarded to County decision makers.
34-2	The comment is noted and forwarded to County decision makers.
34-3	The comment is noted and forwarded to County decision makers.
34-4	The comment is noted and forwarded to County decision makers. The Harris Reclassification Request is included in the Preferred Alternative. See Final SEIS Chapter 2. See the March 1, 2016 Final Staff Report. http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx .

Comment	Response
Harris, Gary	
35-1	The comment is noted and forwarded to County decision makers.
35-2	The comment is noted and forwarded to County decision makers.
35-3	The comment is noted and forwarded to County decision makers.
35-4	The comment is noted and forwarded to County decision makers. The Harris Reclassification Request is included in the Preferred Alternative. See Final SEIS Chapter 2. See the March 1, 2016 Final Staff Report. http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx .
Harris, Yula May	
36-1	The comment is noted and forwarded to County decision makers.
36-2	The comment is noted and forwarded to County decision makers.
36-3	The comment is noted and forwarded to County decision makers.
36-4	The comment is noted and forwarded to County decision makers. The Harris Reclassification Request is included in the Preferred Alternative. See Final SEIS Chapter 2. See the March 1, 2016 Final Staff Report. http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx .
Hayes, Jim and Cathy	
37-1	The area was under consideration for UGA development in 2006. The Comprehensive Plan Update 2036 Preferred Alternative includes the property in the UGA boundary while excluding other areas presently in the UGA closer to Bangor based on the Joint Land Use Study with the Navy, County and multiple local governments.
Stewart, Gary; Hayes, Cathy;	
38-1	Comment noted. In the Preferred Alternative, some areas currently zoned Mixed Use (MU) in the western portion of the Silverdale Regional Growth Center would be changed to Urban High residential zoning and portions of the area that are more sensitive would be Urban Restricted (UR). See Final SEIS Chapter 2.
Kilbridge, Keven	
39-1	The Park zone is applied to the Wynn-Jones Preserve. The property is identified as the Wynn Jones Preserve on on-line maps. The signage for the property is an operational concern for the Parks Department. Please contact the Parks Department regarding the ability to add signage. The County provides directions to the site, rules, and other information, here: http://www.kitsapgov.com/parks/Parks/Pages/regionalparks/wynnjones_preserve.htm .
Kitsap Livable Environment Action Network (Bruce McCain, PhD, Bert Jackson, Marilyn Bode, Mary Gleysteen, Margaret Tufft, Craig Jacob Brown, Alice McCain, and Mark Barabasz)	
40-1	<p>The comment is noted and forwarded to County decision makers. Please note the following:</p> <ul style="list-style-type: none"> • Port Gamble Town Redevelopment Master Plan is currently being evaluated through an environmental impact statement, thus providing a specific opportunity to evaluate and provide public comments on site-specific impacts. The Draft EIS has been on hold at the request of the applicant, but is anticipated to be issued for public comment in 2016. • The land owner (Olympic Property Group) has a vested land use application under the current Rural Historic Town Waterfront zoning designation. This designation was established during a prior Comprehensive Plan effort is not currently proposed for revision. • Site-specific environmental factors (e.g. flood hazard areas) will be utilized as part of the EIS and development permit review process. This will include distribution of documents to agencies with oversight on the Port Gamble Bay clean-up effort.

Comment	Response
Legge, Tecla	
41-1	The comment is noted and forwarded to County decision makers.
Libby, Mark	
42-1	The comment is noted and forwarded to County decision makers. The Jefferson Point area was included in Alternative 3. It is not include in the Preferred Alternative. See Chapter 2 of the Final SEIS. The area west of Ohio Avenue NE is shown as Urban Restricted (UR) as proposed in Alternatives 2 and 3.
Maddox, Michael	
43-1	The comment is noted and forwarded to County decision makers.
43-2	The comment is noted and forwarded to County decision makers. The Preferred Alternative includes the Gonzalez site as Rural Industrial (RI), but retains the Cornerstone Alliance Church as Rural Residential (RR). See the March 1, 2016 Final Staff Report. http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx .
Mauren, Mark	
44-1	Comment noted. See the March 1, 2016 Final Staff Report. http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx .
44-2	The proposed access and suitability for the Mineral Resources Overlay (MRO) is described on page 10 of the March 1, 2016 Final Staff Report. See the link in Response to Comment 44-1.
44-3	The original application materials submitted by the applicant do not mention the zoning amendment as being necessary to support the existing mining operation. A zoning change to Rural Industrial (RI) is not required to permit land uses that have already been approved as part of the Mineral Resource Conditional Use Permit (CUP). The CUP could be amended to address the expansion of uses already approved under the existing CUP. See pages 9 and 11 of the March 1, 2016 Final Staff Report: The RI designation is not required to support the existing mining operation if the MRO request is approved.
44-4	Comment noted. The means of access has been studied with a project level Supplemental EIS: Ueland Tree Farm Mineral Resource Project- Proposed CUP Modification Final Supplemental Environmental Impact Statement August 4, 2015.
44-5	Comment noted. See response to comment 44-3.
44-6	Comment noted. See the March 1, 2016 Final Staff Report which references information provided by the applicant.
44-7	Comment noted. See the March 1, 2016 Final Staff Report which references information provided by the applicant.
44-8	Comment noted. See the March 1, 2016 Final Staff Report which references information provided by the applicant.
44-9	Comment noted. See the March 1, 2016 Final Staff Report which references information provided by the applicant.
44-10	Comment noted. Please note other mineral operations in the rural area of Kitsap County are also not zoned Rural Industrial (RI). See also Response to Comment 44-3.
44-11	Comment noted. See response to comment 44-3.
44-12	Comment noted. See response to comment 44-3. Following reclamation additional Comprehensive Planning and zoning evaluation can occur at that time.

Comment	Response
44-13	Commented noted. If the subject property is rezoned to Rural Industrial (RI) future development could occur based on any of the allowed land uses in the RI Zone. Therefore, the analysis in the staff report is not based entirely on the existing mining operation, but also what land use and development could occur in the future in accordance with the RI zoning.
44-14	Comment noted. See response to comment 44-3.
44-15	Comment noted. See response to comment 44-13.
44-16	See Responses to Comment 44-3 and 44-4 as well as 44-13.
44-17	See Responses to Comment 44-3 and 44-4 as well as 44-13.
44-18	See Responses to Comment 44-3 and 44-4 as well as 44-13.
Merkel, Joyce	
45-1	The comment is noted and forwarded to County decision makers. The Preferred Alternative shows the designation of Commercial, consolidating a number of current zones. See Chapter 2 of the Final SEIS.
Mischel, Jerry and Judy	
46-1	The comment is noted and forwarded to County decision makers. The Preferred Alternative includes the property as Rural Protection (RP) with an equivalent lot density of 1 unit per 10 acres as the Urban Reserve (URS) zone.
46-2	The comment is noted and forwarded to County decision makers. GMA also promotes lower density in areas within or between UGAs.
46-3	The comment is noted and forwarded to County decision makers. The area is not part of a UGA and would retain that status.
46-4	The comment is noted and forwarded to County decision makers. See Response to Comment 46-1.
NA	
47-1	The comment is noted and forwarded to County decision makers.
NA	
48-1	Comment noted. Site-specific reclassification requests must be considered within the context of the plan alternatives and other proposed land use and zoning amendments. The Preferred Alternative includes the 1.6 acre property in the reclassification request in the West Bremerton UGA as Urban Low (UL).
NA	
49-1	The comment is noted and forwarded to County decision makers. The Preferred Alternative results in a net decrease of UGA land, and promotes a more mixed use character in the Regional Growth Center, more similar to Alternative 2 than Alternative 3. See Final SEIS Chapter 2.
NA	
50-1	The comment is noted and forwarded to County decision makers. The Preferred Alternative retains Barker Creek corridor outside the UGA. The Tracyton area is retained in the UGA.

Comment	Response
NA	
51-1	The comment is noted and forwarded to County decision makers. The Preferred Alternative is similar to Alternative 2 in the Draft SEIS by creating a UGA that is reduced in area with a denser core in the Regional Growth Center (RGC).
NA	
52-1	The comment is noted and forwarded to County decision makers. The Preferred Alternative retains the Tracyton area in the UGA.
NA	
53-1	The comment is noted and forwarded to County decision makers. The Preferred Alternative retains Barker Creek corridor outside the UGA. Much of the shoreline west of the Central Kitsap UGA is outside the UGA. The Preferred Alternative retains the Tracyton area in the UGA due to its urban lot pattern and ability to be sewered.
NA	
54-1	The comment is noted and forwarded to County decision makers. The Preferred Alternative shows Royal Valley as Urban Cluster (UC) where master plan provisions would apply. Senior Living Homestead Zone (SLHZ) provisions would be moved into the UC zone. The Preferred Alternative retains Barker Creek corridor outside the UGA.
NA	
55-1	The comment is noted and forwarded to County decision makers. The Preferred Alternative recognizes the school, and expands the Kingston UGA to the west to address all the school owned property.
NA	
56-1	The comment is noted and forwarded to County decision makers. Alternative 2 with an adjustment to the western UGA boundary to address school-owned property is part of the Preferred Alternative. Incorporation is an option for property owners and residents, but it is a citizen led process.
NA	
57-1	The comment is noted and forwarded to County decision makers. The area is retained as Rural Residential (RR) at 1 units per 5 acres. A one-acre lot size is not allowed by GMA to avoid sprawl, and is not an option in Kitsap County zones.
NA	
58-1	The comment is noted and forwarded to County decision makers. See Response to Comment 57-1.
NA	
59-1	The comment is noted and forwarded to County decision makers. See Response to Comment 57-1.
NA	
60-1	Please review Capital Facility Plan section 4.3 - Public Safety, Fire Protection on page 4-40 for information on all the Kitsap County Fire Departments and Districts: North Kitsap Fire and Rescue, Poulsbo Fire Department, Bainbridge Island Fire Department, Central Kitsap Fire and Rescue, Bremerton Fire Department, and South Kitsap Fire and Rescue.

Comment	Response
NA	
61-1	The comment is noted and forwarded to County decision makers. Please see the Economic Development Element of the Comprehensive Plan.
NA	
62-1	The comment is noted and forwarded to County decision makers.
NA	
63-1	The comment is noted and forwarded to County decision makers. See the Preferred Alternative which applies Urban Restricted (UR) in the area along Ohio Avenue.
NA	
64-1	The comment is noted and forwarded to County decision makers. The Capital Facilities Plan summarizes and incorporates by reference information in the 2012 Parks, Recreation, and Open Space Plan. See Sections 1.3 and 4.4. The Parks Department intends to update the plan by 2018.
NA	
65-1	The comment is noted and forwarded to County decision makers. Under all alternatives, Kingston retains mixed use and commercial zoning in the town center. Modest UGA changes are proposed to address school district properties.
NA	
66-1	The comment is noted and forwarded to County decision makers. Commercial zoning is proposed with the Preferred Alternative west of Almira Drive NE, but that allows for mixed use residential. Gorst is studied in an adopted 2013 subarea plan adopted by the County and City and is proposed for streetscape and road improvements.
Vacations Rental Petition	
67-1	The comment is noted and forwarded to County decision makers.
Nelson, Rex	
68-1	The property retains a Rural Protection (RP) zone in all studied alternatives.
Nevins, Tom	
69-1	The comment is noted and forwarded to County decision makers.
Nevins, Tom	
70-1	The comment is noted and forwarded to County decision makers. The added commercial designations along SR 303 in Central Kitsap was proposed to add capacity to better meet the employment target for the UGA. The SR 303 corridor is currently inside the designated UGA boundary.
Nevins, Tom	
71-1	The comment is noted and forwarded to County decision makers. The proposal is recommended for denial in the Preferred Alternative. See the March 1, 2016 Staff Report: http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx .

Comment	Response
71-2	<p>The comment is noted and forwarded to County decision makers. The Preferred Alternative would approve the Mineral Resource Overlay (MRO) on the subject property, with Rural Protection (RP) zoning, and would deny the request for Rural Industrial (RI) zoning. See the March 1, 2016 Staff Report: http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx.</p>
71-3	<p>The comment is noted and forwarded to County decision makers. The comment is noted and forwarded to County decision makers. Application 15-00607 is related to the Cornerstone Alliance property. The Preferred Alternative retains the Rural Residential (RR) designation. See the March 1, 2016 Staff Report: http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx.</p>
71-4	<p>Site-specific reclassification requests must be considered within the context of the plan alternatives and other proposed land use and zoning amendments. The Preferred Alternative includes the 1.6 acre property in the reclassification request in the West Bremerton UGA as Urban Low (UL). Whereas initially the City of Bremerton did not support the application at the time the December 2015 staff reports were issued, the City has now indicated it would support the proposal. The site is within 150 feet of sewer service. The 1.6 acre property is already platted at urban lot sizes. The Final SEIS and Preferred Alternative CFP address the site. See the March 1, 2016 Staff Report: http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx.</p>
71-5	<p>The comment is noted and forwarded to County decision makers. The Preferred Alternative does not include the requested change to Rural Commercial (RCO) in George's Corner. See Response to Comment 23-11.</p>
71-6	<p>The comment is noted and forwarded to County decision makers. The subject property does not have existing water and sewer utilities, but both services are within close proximity. The property was included in the Draft SEIS Alternative 3 and considered in the Draft Capital Facility Plan. The property is in a lower tier of priority for urban services as it is not already characterized by urban growth or served by urban services such as sewer. The Preferred Alternative Silverdale UGA proposal is to create a more compact UGA boundary and focus more growth into the Regional Growth Center (RGC). Some areas to the west of the UGA are proposed for either exclusion (near Bangor) or inclusion (an area with existing urban development and urban services to the south – and considered in 2012). The site is not included in the Preferred Alternative. See also the March 1, 2016 Staff Report: http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx.</p>
71-7	<p>The comment is noted and forwarded to County decision makers. The Preferred Alternative does not include the requested change for El Dorado Hills LLC. See the March 1, 2016 Staff Report: http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx.</p>
71-8	<p>The comment is noted and forwarded to County decision makers. The Fox Harbor Rentals proposal for increased rural density is not included in the Preferred Alternative. See the March 1, 2016 Staff Report: http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx.</p>
71-9	<p>The comment is noted and forwarded to County decision makers. The applicant has revised the application since December 2015 to request Rural Protection (RP) instead of Rural Residential (RR) in place of the existing Rural Wooded (RW). The revised application is recommended by staff for approval and is included in the Preferred Alternative. See the March 1, 2016 Staff Report: http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx.</p>
71-10	<p>The comment is noted and forwarded to County decision makers. The Preferred Alternative includes the Gonzalez site as Rural Industrial (RI), but retains the Cornerstone Alliance Church as Rural Residential (RR). See the March 1, 2016 Final Staff Report. http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx.</p>

Comment	Response
71-11	The comment is noted and forwarded to County decision makers. The Harris Reclassification Request is included in the Preferred Alternative. See the March 1, 2016 Final Staff Report. http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx .
71-12	The comment is noted and forwarded to County decision makers. The request is included in the Preferred Alternative. See the March 1, 2016 Final Staff Report. http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx .
71-13	The comment is noted and forwarded to County decision makers. The proposal is included in the Preferred Alternative due to its location and surrounding uses as well as other factors. See the March 1, 2016 Final Staff Report. http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx .
71-14	The comment is noted and forwarded to County decision makers. The request is not included in the Preferred Alternative. See the March 1, 2016 Final Staff Report. http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx .
71-15	The comment is noted and forwarded to County decision makers. The proposed Rural Employment Center (REC) zoning designation allows for a wider range of commercial, industrial, and institutional uses than under existing zoning including general offices, retail, and restaurant. An airport and supporting facilities is not a permitted or conditional use in the REC, but the airport could continue to operate as a non-conforming use. The site is included as a Type II LAMIRD in the Preferred Alternative. See the March 1, 2016 Final Staff Report. http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx .
71-16	The comment is noted and forwarded to County decision makers. The Porter request is included in the Preferred Alternative. See the March 1, 2016 Final Staff Report. http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx .
71-17	The comment is noted and forwarded to County decision makers. The request is included in the Preferred Alternative. The property is currently located in the Central Kitsap UGA which requires additional employment uses, and is in an area where urban services are available to serve the site. See the March 1, 2016 Final Staff Report. http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx .
71-18	The comment is noted and forwarded to County decision makers. The request is included in the Preferred Alternative. See the March 1, 2016 Final Staff Report. http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx .
71-19	Comment noted. The Royal Valley area has been considered in UGA alternatives in 2006 and 2012. It was added into the UGA in 2012 for senior housing purposes. The Preferred Alternative would apply Urban Cluster Residential (UCR) instead of Senior Living Homestead (SLH) in order to allow for both multi-generational housing and continuum of care. Master planning would still be required. See the March 1, 2016 Final Staff Report. http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx .
71-20	Comment noted. The Ryan application was withdrawn. The Preferred Alternative does not change the present residential land use designation or zoning for the site in the Gorst UGA.
71-21	The comment is noted and forwarded to County decision makers. The site is already in the UGA. The request to change zoning from Urban Medium (UM) Residential to Industrial (IND) is included in the Preferred Alternative. The request is supported by the City of Bremerton. Though resulting in an employment capacity above the target, the Preferred Alternative job capacity is reduced over the Alternative 1 No Action employment capacity. See the March 1, 2016 Final Staff Report. http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx .

Comment	Response
71-22	The comment is noted and forwarded to County decision makers. Approval of the site-specific reclassification may establish a precedent for approving similar requests in the future. The request is not included in the Preferred Alternative. See the March 1, 2016 Final Staff Report. http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx .
71-23	The comment is noted and forwarded to County decision makers. The request is included in the Preferred Alternative based on Board of County Commissioner (BOCC) direction.
71-24	The comment is noted and forwarded to County decision makers. The request is included in the Preferred Alternative, subject to conditions. See the March 1, 2016 Final Staff Report. http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx .
71-25	The comment is noted and forwarded to County decision makers. The proposal is included in the Preferred Alternative. Golf courses (the existing use on the site) are a prohibited use under Rural Wooded (RW) zoning and are a conditional permitted use under Rural Residential (RR) zoning. See the March 1, 2016 Final Staff Report. http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx .
Nevins, Tom	
72-1	The 2012 Appendix includes a matrix of alternative sewer methods. The referenced sentence is indicating that community drainfields are suitable in urban areas under two circumstances: 1) where aquifer recharge and stream flows are of issue; or 2) as interim measures that promote the future extension of advanced forms of wastewater service that are described below in other rows of the matrix.
Nevins, Tom	
73-1	The comment is noted and forwarded to County decision makers. The Draft SEIS addresses the LAMIRD criteria for the Keyport Junction LAMIRD proposed under Alternative 2. See Draft SEIS Exhibit 3.2-15. Keyport Junction Type III LAMIRD.
O'Sullivan, Alison (Suquamish Tribe Fisheries Department)	
74-1	Please see comment responses to Comment 33-1 and 33-2.
74-2	Please see Responses to Comments 33-3 and 33-10. The Preferred Alternative, including UGA boundaries, is based on established UGA growth targets, 2014 Buildable Lands Report (BLR) methods upheld by the Growth Management Hearings Board, and balance of GMA goals. UGA expansions may be offset by UGA reductions in other locations. The Reclassification Requests are reviewed against County Code criteria which do address need. Some Reclassification Requests are carried forward in the Preferred Alternative.
74-3	The comment is noted and forwarded to County decision makers. Urban services are focused in UGAs. See the proposed Capital Facilities Plan.
74-4	The comment is noted and forwarded to County decision makers.
74-5	The comment is noted and forwarded to County decision makers. See Response to Comment 23-11.
74-6	The comment is noted and forwarded to County decision makers. See Response to Comment 23-9.
74-7	The comment is noted and forwarded to County decision makers. See Response to Comment 71-20.
74-8	Please see Responses to Comments 33-3 and 33-10.
74-9	Comment noted. The Draft Capital Facilities Plan addresses sewer service in the UGA.

Comment	Response
74-10	The comment is noted and forwarded to County decision makers.
74-11	The comment is noted and forwarded to County decision makers. The Comprehensive Plan Update EIS in 2006 addressed Cultural Resources and is adopted by the County (see Notice of Adoption accompanying the Kitsap County 2016 Comprehensive Plan Update). Additionally, the Gorst EIS is adopted by the County as part of the Kitsap County 2016 Comprehensive Plan Update. See Response to Comment 9-2 regarding permit tracking opportunities to identify cultural resources prior to development.
74-12	<p>The Draft SEIS includes the following mitigation measure in Section 3.1.4.</p> <ul style="list-style-type: none"> • Kitsap County supports and implements ecological restoration projects. Planned restoration projects are highlighted in the Shoreline Restoration Plan, Appendix C of the adopted Kitsap County SMP. Kitsap County is also an active member jurisdiction in leading the Hood Canal Coordinating Council and the West Sound Watersheds Council, both of which are responsible for coordinating the implementation of restoration actions within the Kitsap Peninsula and Hood Canal regions. <p>The Chico Watershed Plan, and its proposed areas of protection and restoration, is added to this mitigation measure in Chapter 5, Clarifications, and Corrections, of the Final SEIS.</p>
74-13	The comment is noted and forwarded to County decision makers. See Final SEIS Appendix B.
74-14	The comment is noted and forwarded to County decision makers. Please see proposed Reasonable Measures in Final SEIS Appendix B.
74-15	The comment is noted and forwarded to County decision makers. Please see proposed Reasonable Measures in Final SEIS Appendix B.
74-16	The comment is noted and forwarded to County decision makers. Please see proposed Reasonable Measures in Final SEIS Appendix B.
74-17	The comment is noted and forwarded to County decision makers. Please see proposed Reasonable Measures in Final SEIS Appendix B.
74-18	The comment is noted and forwarded to County decision makers. Please see proposed Reasonable Measures in Final SEIS Appendix B.
74-19	The comment is noted and forwarded to County decision makers. See Final SEIS Appendix B.
74-20	<p>The purpose of the report was to evaluate existing measures and identify potential new ones.</p> <p>Clustering and Master Planned Development: Measure 2 would “Allow clustered residential development”. Measure 11 is to allow “master planning large parcel developments.” Both Measure 2 and Measure 11 were adopted by the County in Resolution 158-2004. Measure 2 is also included in the Kitsap Regional Coordinating Council (KRCC) produced “Reasonable Measures: A Desktop Reference Guide” as Measure 18. Both measures are applied in UGAs. Thus to remove from evaluation UGA reasonable measures that are already adopted would defeat the purpose of the report to evaluate the effectiveness of the adopted measures. Whether the County chooses to continue the reasonable measures is a policy choice. Parcel reconfiguration is another new rural measure. It would not allow added lots, but would allow a configuration that could better protect natural features. However, the report notes limitations on its use in other counties. The commenter’s position on clustering is noted and forwarded to County decision makers.</p> <p>Legacy lot consolidation/aggregation is under consideration as a new measure. See Section 6.2 of the Draft SEIS Appendix G. Lot consolidation or aggregation would be triggered by a minimum parcel size for new development. The ability to add incentives such as fee waivers is a recommendation to overcome some limitations in other counties’ experience.</p>

Comment	Response
	The Draft SEIS Appendix G includes an evaluation of each measure including year by year results. It provides recommendations for amending or adding reasonable measures and for removing others.
74-21	The Capital Facilities Plan Appendix A contains maps showing existing and planned sewer infrastructure.
Palmer, William (email - overall process)	
75-1	RCW 36.70A.210 (2) indicates that countywide planning policies are a framework for each county and city to develop their comprehensive plans. The countywide planning policies are to be adopted by the County in cooperation with cities. There is no requirement that the policies be included in the Comprehensive Plan. The Countywide Planning Policies have been adopted by Kitsap County in all the years cited and apply to the County's Comprehensive Plan and other cities' plans. There have been revisions to Kitsap County Countywide Planning Policies through the year 2014.
Palmer, William (email - public participation)	
76-1	See Response to Comments 1-2 and 33-1.
76-2	The County and City staffs held meetings on mid-2015 to spring 2016 on land capacity and the County and City participated in the Kitsap Regional Coordinating Council on growth allocations and capacity methods. The County met with the Port Orchard Mayor and Council members in winter 2016. The County held multiple public hearings on alternatives and the City of Port Orchard made comments. Much of the Bethel Corridor is retained in the Preferred Alternative described in Chapter 2 of this Final SEIS.
76-3	The growth in South Kitsap has not been "transferred" to North Kitsap. Each UGA is sized based on its growth targets in the Countywide Planning Policies. Population and employment targets are based on the State Office of Financial Management projections and the Puget Sound Regional Council VISION 2040 Regional Growth Strategy. Based on the Regional Growth Strategy, designated Centers like Silverdale mall area, Bremerton Downtown, and the South Kitsap Industrial Area.
76-4	The County has had an extensive public participation process. The County's Public Participation Plan and periodic reports are found at the County's dedicated website: http://compplan.kitsapgov.com/pages/products.aspx .
76-5	The County held a 30-day comment period on the Draft SEIS. In addition numerous Planning Commission and Board of County Commissioner hearings have been held. The County held public hearings in February 2016 on the alternatives and staff recommendations. Additional hearings have been held in March 2016 on reclassification requests. The County also hosted a Comprehensive Plan Open House at the County Administration Building on the afternoon of April 15, 2016. In addition, there will be legislative hearings on the Comprehensive Plan itself between April and June 2016.
76-6	See summaries of public events and comments over the last two years at the link in Response to Comment 76-4.
76-7	See Response to Comments 76-4 through 6. Regarding specific events in addition to those noted in the prior responses in 76-4 through 76-6, Kitsap County held meetings with stakeholders such as home builders when the Draft Plan and EIS were available for review.
76-8	See Response to Comment 76-5.
76-9	The County's public participation process has substantially exceeded GMA requirements identified in RCW 36.70A.035 and 140.
76-10	See Response to Comments 76-4, -5, and -9.
76-11	See Response to Comments 76-4, -5, and -9.

Comment	Response
76-12	See Response to Comments 76-4, -5, and -9.
76-13	See Response to Comments 76-4, -5, and -9.
76-14	See Response to Comments 76-4, -5, and -9.
76-15	See Response to Comments 76-4, -5, and -9.
Palmer, William (email – overall process)	
77-1	See Response to Comment 75-1.
FSN; Palmer, William	
78-1	Comment noted. The final staff reports published March 1, 2016 show all the application's parcels. See http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx .
78-2	As the staff reports issued in fall 2015 were provided for public comment, no recommendations were provided. The final staff reports published March 1, 2016 include specific recommendations. The criteria in the staff reports are those in the County's code (KCC Chapter 21.08) published and available to the applicant's and their representatives: http://www.codepublishing.com/WA/KitsapCounty/ . The staff report addresses all of the criteria in KCC 21.08.070.A and D.
78-3	Regardless of the configuration of the parcels, County maps identify the subject parcels as being within a "Moderate Geological Hazard Area", which is a factor in determining the appropriateness of the parcels to support urban development. The applicant states in the SEPA checklist that the subject parcels have slopes of approximately 20 percent, which is one of the criteria for designating Areas of Moderate Geological Hazard in accordance with KCC 19.4000.410. In accordance with KCC 19.4000.410.B a site-specific geotechnical report may be provided if the applicant questions the County information on geological hazards. No geotechnical report was provided with the application.
78-4	While Kitsap County provides sewer service, the property is requesting inclusion in a UGA assigned to the City of Bremerton. Thus, it is important that the City be in concurrency. The City of Bremerton has newly indicated their support for the application. Please see the updated staff report here: http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx .
78-5	See Response to Comment 78-2.
78-6	See page 5 of the March 1, 2016 staff report indicating there is updated buildable lands information.
78-7	See page 6 of the March 1, 2016 staff report indicating the staff finds the plan is still generally valid, but references updated buildable lands information.
78-8	This is a legislative process. The staff and applicant have provided information. The County Board of Commissioner will determine if the property is included in the UGA.
78-9	On page 6 the March 1, 2016 staff report indicates: "these lots were platted pre-GMA and are urban sized lots that do not meet Kitsap County's established rural character."
78-10	The comment is noted and forwarded to County decision makers.
78-11	The staff report indicates sewer service is close but only a broad analysis of sewer has been prepared in 2006. That is not equivalent to a site-specific sewer plan.
78-12	The Urban Reserve (URS) zone is a rural zone. Due to its confusing title the zone is being eliminated. While the lots have been platted, there is no urban development on them. Health Department rules for septic systems would

Comment	Response
	result in less density on the legal lots of record if retained in the rural area than if sewerred and included in the urban area.
78-13	See Response to Comment 75-1.
78-14	See Response to Comment 78-12. URS is a rural zone per KCC 17.315.010, which states "The Zone is intended to allow continued rural development...." The City of Bremerton has sufficient development capacity in the UGA under present land use and zoning designations. The Preferred Alternative makes minor adjustments to the Bremerton UGA and accordingly reduces the capacity to be within 1% of target, even with inclusion of the small Curtiss-Avery application.
78-15	The comment is noted and forwarded to County decision makers.
78-16	See Response to Comment 78-11.
78-17	Regarding sprawl, the staff report indicates "If in the UGA, the development potential with the already created small lots would be realized if sewer service is provided." Past Comprehensive Plan Updates regarding UGA boundaries are legislative actions – policy choices – and balance GMA goals including appropriately sizing UGAs as well as Growth Management Hearings Board cases. The applicant is directed to the record of those past plan updates. There was a deliberative process, not an arbitrary one.
78-18	See Response to Comment 78-4.
78-19	See Response to Comment 75-1.
78-20	See Responses to Comment 78-4, 78-12 and 78-14.
78-21	See Response to Comment 78-14.
78-22	See the Final SEIS Transportation results for the Preferred Alternative, and the Draft SEIS for Alternatives 2 and 3 for the associated transportation results. Cumulatively growth, including the small increment from the property, would require additional improvements.
78-23	Comment noted. The comment letter is part of the Final SEIS and has been posted online.
Bair, Chuck and Patty; William Palmer (letter dated 12/4/15)	
79-1	Permitted and conditional uses in the Rural Industrial (RI) Zone were determined by the County as part of past planning processes (e.g. 1998). Conditional use review minimizes the likelihood of significant adverse impacts from development in the RI zone by requiring a more detailed by the County.
79-2	The comments are noted and forwarded to County decision makers. Non-conforming rules allow grandfathered uses until they are removed or discontinued. See KCC Chapter 17.460.
79-3	The comments are noted and forwarded to County decision makers. The County will weigh and balance GMA goals including the potential availability of vacant and redevelopable land in UGAs.
Shourup; William Palmer LLC	
80-1	Comment noted. The updated staff reports posted on the Kitsap County 2036 website include specific recommendations. The criteria in the staff reports are those in the County's code (KCC Chapter 21.08) published and available to the applicant's and their representatives: http://www.codepublishing.com/WA/KitsapCounty/ . The staff report addresses all of the criteria in KCC 21.08.070.A and D.

Comment	Response
80-2	Comment noted. The information on wetlands is consistent with the updated Staff Report March 1, 2016, available: http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx .
80-3	Exhibit 1 on page 2 of the staff report identifies current land use west and north of the subject property as "Government and Services" which is based on Kitsap County GIS data and Assessor tax use information. The staff report accurately describes the parcel to the north as being zoned "Industrial".
80-4	County decisions regarding site-specific reclassification requests are legislative actions and not quasi-judicial. Unless an application is determined to directly conflict with local or state laws, the County has discretion in approving or denying requests based on the County review criteria, public input, guidance from GMA, County planning goals and policies, and best practices for urban and rural planning.
80-5	Comment noted. See Response to Comment 80-4.
Edwards, William Palmer LLC	
81-1	See Response to Comment 78-2. The updated staff reports posted on the Kitsap County 2036 website include specific recommendations. The staff report addresses all of the criteria in KCC 21.08.070.A and D.
81-2	The comments are noted and forwarded to County decision makers. Critical area maps are guides to presence of critical areas such as wetlands. Development applications would provide more detailed reports at the time of application.
81-3	The comments are noted and forwarded to County decision makers. The map of current uses are based on Assessor use codes.
81-4	The comments are noted and forwarded to County decision makers. The staff report analysis was at a planning level with caveats noted. See also Response to Comment 81-2.
81-5	The comments are noted and forwarded to County decision makers. See also Response to Comment 81-2.
81-6	See Response to Comment 75-1.
81-7	See Response to Comment 75-1.
81-8	County decisions regarding site-specific reclassification requests are legislative actions and not quasi-judicial. Unless an application is determined to directly conflict with local or state laws, the County has discretion in approving or denying requests based on the County review criteria, public input, guidance from GMA, County planning goals and policies, and best practices for urban and rural planning.
Fox Harbor Rentals, William Palmer LLC	
82-1	Comment noted. The updated staff reports posted on the Kitsap County 2036 website include specific recommendations. The criteria in the staff reports are those in the County's code (KCC Chapter 21.08) published and available to the applicant's and their representatives: http://www.codepublishing.com/WA/KitsapCounty/ . The staff report addresses all of the criteria in KCC 21.08.070.A and D.
82-2	Comment noted. The maps attached to the staff report clearly identify areas on the subject property that have mapped environmental constraints. Environmental constraints are one factor used in determining the appropriate zoning for the property as required per the County legislative review criteria.
82-3	Comment noted. The staff report identifies there are areas zoned Rural Residential (RR) at lot sizes more compatible with the 1 unit per five acres than the subject site which is over 20 acres in size.
82-4	Comment noted. See Response to Comment 82-1.

Comment	Response
82-5	County decisions regarding site-specific reclassification requests are legislative actions and not quasi-judicial. Unless an application is determined to directly conflict with local or state laws, the County has discretion in approving or denying requests based on the County review criteria, public input, guidance from GMA, County planning goals and policies, and best practices for urban and rural planning.
82-6	Population growth of the proposal is the proposed action, and is not the same as assumptions of the No Action (pre-update) Comprehensive Plan.
82-7	County legislative actions need to consider the context of the whole Comprehensive Plan and GMA requirements. See Response to Comment 82-5.
82-8	The analysis in the staff report does not identify the demand for service as urban, merely that there would be an incremental increase in demand in the area of the proposed application.
82-9	Staff's analysis of the application also considers cumulative impacts if the County were to approve all similar site-specific reclassification requests. See Response to Comment 82-5.
82-10	The comments are noted and forwarded to County decision makers.
82-11	Rural Protection (RP) zoning applies beyond the properties noted by the applicant to other areas of south Kitsap County.
82-12	See Response to Comment 82-9.
82-13	The comments are noted and forwarded to County decision makers.
82-14	See Response to Comment 75-1.
82-15	See Response to Comment 75-1.
82-16	The application by itself does not substantially affect the urban/rural population balance under Criteria 4a, but would set a precedent for future changes from RP to RR; staff report conclusions are that Criteria 4a is not fully met. Criteria 4b shows the land is not a resource land of long-term significance, and the application does not affect this criteria.
82-17	The staff report provides findings and conclusions for County decision maker consideration. County decisions regarding site-specific reclassification requests are legislative actions and not quasi-judicial. Unless an application is determined to directly conflict with local or state laws, the County has discretion in approving or denying requests based on the County review criteria, public input, guidance from the GMA, County planning goals and policies, and best practices for urban and rural planning.
Laurier Enterprises; Palmer, William M.	
83-1	Comment noted. The updated staff reports posted on the Kitsap County 2036 website include specific recommendations. The criteria in the staff reports are those in the County's code (KCC Chapter 21.08) published and available to the applicant's and their representatives: http://www.codepublishing.com/WA/KitsapCounty/ . The staff report addresses all of the criteria in KCC 21.08.070.A and D.
83-2	The comments are noted and forwarded to County decision makers.
83-3	Comment noted. The public comments made regarding the reason for the application is added to the Public Comments section of the March 1, 2016 Staff Report. See the report available here: http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx .

Comment	Response
83-4	The current land use and zoning descriptions in Exhibit 1 come from Kitsap County GIS and Mapping department. See Attachments in staff report for corresponding maps.
83-5	County decisions regarding site-specific reclassification requests are legislative actions and not quasi-judicial. Unless an application is determined to directly conflict with local or state laws, the County has discretion in approving or denying requests based on the County review criteria, public input, guidance from the GMA, County planning goals and policies, and best practices for urban and rural planning.
83-6	The comments are noted and forwarded to County decision makers. Staff reports are available at the project website at the link provided in Response to Comment 83-3 in advance of the public hearings on reclassification requests held in March 2016.
Tallman; William Palmer	
84-1	Comment noted. The updated staff reports posted on the Kitsap County 2036 website include specific recommendations. The criteria in the staff reports are those in the County's code (KCC Chapter 21.08) published and available to the applicant's and their representatives: http://www.codepublishing.com/WA/KitsapCounty/ . The staff report addresses all of the criteria in KCC 21.08.070.A and D.
84-2	Comment noted. The maps attached to the staff report clearly identify areas on the subject property that have mapped environmental constraints. Environmental constraints are one factor used in determining the appropriate zoning for the property as required per the County legislative review criteria. Maps are an indicator of potential critical areas.
84-3	Commented noted. The maps are based on Assessor information. Ownership may change overtime, as may uses allowed by the applicable zoning.
84-4	The Rural Wooded (RW) zone has been applied to public and private land. The intent of the zone, is in part to: "encourage the preservation of forest uses, retain an area's rural character and conserve the natural resources while providing for some rural residential use."
84-5	Comment noted. Staff's analysis of the application also considers cumulative impacts if the County were to approve all similar site-specific reclassification requests.
84-6	Comment noted. See response to comment 84-5.
84-7	The analysis in the staff report does not identify the demand for service as urban, merely that there would be an incremental increase in demand in the area of the proposed application.
84-8	See response to comment 84-5.
84-9	Increasing rural density could allow future homesites and greater clearing of existing woodlands; low impact development techniques may be applicable. A mine nearby is another type of resource use.
84-10	See Response to Comment 84-4.
84-11	See above Response to Comment 84-5. Additionally the Board of County Commissioners (BOCC) has noted in its authorization of the request that adjacent parcel patterns to the north and west of the applicant's property have similar RR designations.
84-12	See above Response to Comment 84-5.
84-13	Please see Response to Comment 75-1.
84-14	Please see Response to Comment 75-1.

Comment	Response
84-15	<p>See response to comment 84-5 regarding rural/urban population balance and precedent setting actions. The site is not a designated land of long-term significance for forestry as stated in the staff report, criteria 4b.</p> <p>County decisions regarding site-specific reclassification requests are legislative actions and not quasi-judicial. Unless an application is determined to directly conflict with local or state laws, the County has discretion in approving or denying requests based on the County review criteria, public input, guidance from the Growth Management Act (GMA), County planning goals and policies, and best practices for urban and rural planning.</p>
Bair; William Palmer (Response to staff report)	
85-1	<p>Comment noted. The updated staff reports posted on the Kitsap County 2035 website include specific recommendations. The criteria in the staff reports are those in the County's code (KCC Chapter 21.08) published and available to the applicant's and their representatives: http://www.codepublishing.com/WA/KitsapCounty/. The staff report addresses all of the criteria in KCC 21.08.070.A and D.</p>
85-2	<p>Comment noted. The Background section of the staff report includes basic information and data about the subject property and surrounding areas. This information is based in part on Kitsap County GIS and Assessor's data. Upzoning the subject property to support future Rural Industrial (RI) use would likely have increased impacts than redevelopment for single-family use under current zoning. Regardless, the fact the subject property is within a designated Category II aquifer recharge area is a relevant fact for decision-makers to be aware of.</p>
85-3	<p>The information presented in Exhibit 1 concerning current land use and zoning for the subject property and adjacent areas is provided by Kitsap County GIS and Assessor data. The land use classification "Government and Services" is provided by the Assessor's office. See maps attached to the staff report on current land use and zoning. An adjacent non-conforming use is not particularly relevant to the site-specific reclassification request given its status of conflict with its zoning. The surrounding zoning of Rural Residential was more of a factor in staff's analysis and recommendation.</p> <p>The "Error! Reference not found" was a cross reference in the Microsoft word document that was broken and has been corrected in the latest version of the staff report, available here: http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx.</p>
85-4	<p>Comment noted. See responses below.</p>
85-5	<p>Comment noted. The response for General Criteria A.1 refer to the adoption of the most recent Comprehensive Plan, which is the 2012 County Comprehensive Plan and subsequent amendments.</p>
85-6	<p>Comment noted. Since the subject property is in the rural area and not proposed to be added to the UGA the provision of urban services was not a factor in staff's analysis.</p>
85-7	<p>Comment noted. These facts do not appear to be relevant to staff's analysis or recommendation on this site-specific reclassification request. The analysis and recommendations are based on the current Kitsap County Comprehensive Plan.</p>
85-8	<p>Commented noted. The current Kitsap County Comprehensive Plan is from 2012 including subsequent amendments.</p>
85-9	<p>a) Comment noted. Growth targets and capacity relate primarily to the sizing of UGAs. Since the subject property is in the rural area and not proposed to be added to the UGA the updated growth targets and capacity are not a significant factor in staff's analysis and recommendation other than the fact that the County in general aims to focus more growth in urban areas.</p> <p>b) Commented noted. Exhibit 4 includes relevant sections of the Comprehensive Plan in relation to the site-specific reclassification request. Expanding Rural Industrial (RI) zoning to a single property in an area otherwise</p>

Comment	Response
	<p>designated for rural residential development is not consistent with the County's goals to allow limited commercial and industrial uses in rural areas and preserving rural character.</p> <p>c) Comment noted. The updated growth targets and capacity are most relevant to the sizing of UGAs and not a significant factor in staff's analysis or recommendation.</p> <p>d) Comment noted. Updated growth targets and capacity for urban areas is not a significant factor in staff's analysis and recommendation.</p>
85-10	<p>a) Coordinated planning is in the public interest and while the scale of the Bair site-specific application request is small the cumulative effect of granting all similar request throughout the County would not be. The applicant materials submitted address primarily the personal financial interests of the applicant. See "b" regarding public interest and policy choices.</p> <p>b) The County's must balance goals of the GMA, and its own vision, such as providing a compatible and predictable growth pattern for its citizens including this rural neighborhood which has a predominantly rural character.</p> <p>c) Zoning designations are intended to address desired future land use, which may conflict with the current land use.</p> <p>d) Non-conforming uses are a common occurrence with regard to zoning designations. The County may consider current use in establishing zoning designations, but is under no obligation to zone properties based on current use. Dana Heating Company appears to be a service related use, and not industrial.</p>
85-11	<p>See Response to Comment 85-1. The staff report is based on the criteria in KCC 21.08.070.A and D. Staff reviewed the application materials in detail and the application materials will be provided to County decision-makers.</p>
85-12	<p>Comment noted. The adjacent land use to the South is not industrial, but service related. Regardless of case law on "spot zoning", it's not in the public interest to rezone single properties for industrial use in an area zoned for rural residential development and use. County decisions regarding Reclassification Requests are legislative actions and not quasi-judicial. Unless an application is determined to directly conflict with local or state laws, the County has discretion in approving or denying requests based on the County review criteria, public input, guidance from the GMA, County planning goals and policies, and best practices for urban and rural planning.</p>
85-13	<p>Staff's interpretation of the vision statement is that rural commercial and industrial areas should be limited and focused on existing areas, not that all requests for limited areas of commercial and industrial designations should be approved. The subject property is not within an existing area zoned for rural commercial or industrial development and use, and there is not sufficient evidence that the proposal will serve the public interest, or that it is supported by the County's Comprehensive Plan policies.</p>
85-14	<p>Staff was referring to the existing rural residential zoning, not zoning in place before the Growth Management Act (GMA), which is not relevant to this reclassification request.</p>
85-15	<p>The subject property or surrounding properties are not zoned for RI use. Therefore, approval of the reclassification request would constitute expansion of industrial zoning in an areas zoned Rural Residential, as correctly stated in the staff report.</p> <p>Zoning designations are based on desired future development and land use and not based solely on current land use. Also, please note that County decisions regarding Reclassification Requests are legislative actions and not quasi-judicial as described in Response 85-12.</p>
85-16	<p>See Response to Comment 85-16.</p>
85-17	<p>See Response to Comment 85-10.</p>

Comment	Response
85-18	See Responses to Comment 85-10 and 85-12.
85-19	Comment noted. For existing RI areas please refer to County existing land use and zoning maps. The Government or Service designation is based on current County assessor data and existing land use maps. Also see Responses to Comment 85-10 and 85-12.
85-20	Comment noted. The staff report shows the small use would not materially affect growth projections.
85-21	Comment noted. The staff report indicates there would not be a material effect on urban facilities and services.
85-22	See Response to Comment 75-1.
85-23	See Response to Comment 85-13. There is no demonstrated need aligning with the public interest and compatible with the character of RR zoning on adjacent lands. There are locations in other UGAs and existing RI lands to accommodate additional employment.
85-24	See Response to Comment 85-10.
85-25	See Response to Comment 85-12.
85-26	Comment noted. The staff report indicates urban services would not be required.
85-27	The criteria addresses contiguous zoning, not current or prior land use.
85-28	See Response to Comment 85-12.
85-29	The Comprehensive Plan Update alternatives have land capacity for expected employment growth across UGAs for the type of employment requested.
85-30	See Response to Comment 85-12.
Sedgwick Partners; William Palmer	
86-1	The updated staff reports posted on the Kitsap County 2035 website include specific recommendations. The criteria in the staff reports are those in the County's code (KCC Chapter 21.08) published and available to the applicant's and their representatives: http://www.codepublishing.com/WA/KitsapCounty/ . The staff report addresses all of the criteria in KCC 21.08.070.A and D.
86-2	The environmental features shown on County maps are relevant facts for County decision makers and indicate a higher likelihood of geological hazards and the presence of wetlands than if the properties were not designated on County maps. Environmental features are one consideration in determining appropriate zoning designations.
86-3	Exhibit 1 presents information about current land use and zoning for the subject property and adjacent properties based on Kitsap County GIS and Assessor's data. As noted, Exhibit 1 is accurate.
86-4	Comment noted. The staff report identifies changed conditions.
86-5	Comment noted. The staff report notes the zoning for the subject property was planned for in 2006, which is an accurate statement. The "Error! Reference not found" was a cross reference in the Microsoft word document that was broken and has been corrected in the latest version of the staff report.
86-6	Comment noted. The City of Port Orchard does not need additional employment capacity under Alternative 1 No Action. The approval of the site-specific reclassification request would result in an increase in employment capacity. Staff agrees that input from the City of Port Orchard should also be considered. Please note Finding of Fact #10 in the staff report states "The City of Port Orchard City Council does not support approval of the application."

Comment	Response
86-7	See Responses to Comment to letter 76.
86-8	<p>The staff report indicates the proposed amendment does not appear to be in the public interest. Reasons include concerns with spot zoning. Designating a single isolated single-family residential property for high-intensity commercial is contrary to the County's goals for coordinated planning and focusing commercial growth in compact areas or along transportation corridors with a concentration of commercial and mixed-use properties. The property is small and abuts other single family uses, and would set a precedent for strip commercial, unneeded as there is capacity elsewhere in the UGA for employment uses.</p> <p>Additionally, County decisions regarding site-specific reclassification requests are legislative actions and not quasi-judicial. Unless an application is determined to directly conflict with local or state laws, the County has discretion in approving or denying requests based on the County review criteria, public input, guidance from GMA, County planning goals and policies, and best practices for urban and rural planning.</p>
86-9	See Responses to Comment to letter 76.
86-10	See Response to Comment 86-8.
86-11	<p>Comment noted. Based on staff's review of the application and applicable County plans and policies staff finds the approval of the application is not in the public interest. The applicant has not provided sufficient evidence as to why the application is in the public interest, and not simply in the interest of the property owner. The City's lack of support is based on an Email from Port Orchard Development Director, 2015, to Kitsap County on April 14, 2015. See Contact Person on Fact Sheet to review project correspondence.</p>
86-12	See Response to Comment 86-1. The reclassification application is a form, not adopted law. The form summarizes criteria readily available in full in the published code.
86-13	The analysis indicates that the roadway would have future deficiencies with cumulative growth expected by 2036 (2035 is referenced in error in the staff report). Future improvements needed to address the future deficiency would be able to mitigate impacts.
86-14	<p>Comment noted. The "Error! Reference not found" was a cross reference in the Microsoft word document that was broken and has been corrected in the latest version of the staff report. Please refer to pages 2-2 and 2-3 of the Land Use Element in the 2012 Comprehensive for the vision for urban areas and economic development. While there is a mis-lettering of D.1.a and D.1.b the criteria are accurately stated.</p>
86-15	The staff's interpretation of the Vision is stated in the staff report. The applicant does not provide information about why the Vision is supportive of the application. See also Response to Comment 86-8.
86-16	The staff's review of Policy LU-29 is in the staff report. Both sides of the roadway adjacent to the subject site are in residential use and zoning.
86-17	The site is mapped with some constraints, abuts lower density uses, and would set a precedent for strip commercial development.
86-18	The staff report does not indicate compliance with the criteria cited.
86-19	By itself the site is not anticipated to materially affect adequacy of services, though it would increase demand for services; if other sites were reclassified due to precedent there could be a greater demand.
86-20	Comment noted. There is no disagreement the site is in the UGA.
86-21	See Response to Comment 86-6.
86-22	See Response to Comment 75-1.

Comment	Response
86-23	See Response to Comment 75-1.
86-24	The Comprehensive Plan Update 2016 is based on new information on land capacity not available in 2012. See Response to Comment 86-11.
86-25	The staff report interprets the listed policies based on the presence of single family uses on site, to the south and to the north. See Response to Comment 86-11.
86-26	Spot zoning one parcel would set a precedent for other strip commercial in opposition to the listed policy.
86-27	See responses to comments 86-25 and 86-26.
86-28	Comment noted. The commenter quotes the staff report – please refer to the rest of the staff report for context regarding the cumulative projected traffic on the corridor and need for mitigation.
86-29	The staff report findings have provided a basis for the staff conclusions and recommendations to deny the subject request.
86-30	The comment is noted and forwarded to County decision makers. The updated staff reports dated March 1, 2016 were made available prior to public hearings scheduled in March 2016. See report: http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx .
Paulsen, Robert	
87-1	The comment is noted and forwarded to County decision makers. Please see Response to Comment 71-19.
Paralez, Linda	
88-1	The comment is noted and forwarded to County decision makers. The Bair request is not included in the Preferred Alternative.
88-2	The comment is noted and forwarded to County decision makers. See Response to Comment 23-9.
88-3	The comment is noted and forwarded to County decision makers. The Cornerstone Alliance Church request is not included in the Preferred Alternative.
88-4	The comment is noted and forwarded to County decision makers. The DJM Construction request is not included in the Preferred Alternative.
88-5	The comment is noted and forwarded to County decision makers. The Tracyton Tavern application is included in the Preferred Alternative.
88-6	The comment is noted and forwarded to County decision makers. The Gonzalez application is included in the Preferred Alternative.
88-7	The comment is noted and forwarded to County decision makers. The Laurier Enterprises application is included in the Preferred Alternative.
88-8	The comment is noted and forwarded to County decision makers. The Lee application is not included in the Preferred Alternative.
88-9	The comment is noted and forwarded to County decision makers. The Merlinco application is not included in the Preferred Alternative.
88-10	The comment is noted and forwarded to County decision makers. The Port Orchard Airport is included in the Preferred Alternative.

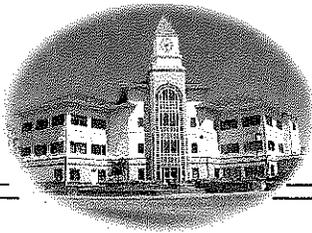
Comment	Response
88-11	The comment is noted and forwarded to County decision makers. The Prigger application is included in the Preferred Alternative.
88-12	The comment is noted and forwarded to County decision makers. The Rodgers application is included in the Preferred Alternative.
88-13	The comment is noted and forwarded to County decision makers. The Ryan application was withdrawn.
88-14	The comment is noted and forwarded to County decision makers. The Schorup application is included in the Preferred Alternative.
88-15	The comment is noted and forwarded to County decision makers. The Sedgwick Partners application is not included in the Preferred Alternative.
88-16	The comment is noted and forwarded to County decision makers. The Unlimited application is included in the Preferred Alternative.
88-17	The comment is noted and forwarded to County decision makers. The Curtiss-Avery application is included in the Preferred Alternative.
88-18	The comment is noted and forwarded to County decision makers. The Eldorado Hills II, LLC application is not included in the Preferred Alternative.
88-19	The comment is noted and forwarded to County decision makers. The Edwards-Mountainview Meadows application is not included in the Preferred Alternative.
88-20	The comment is noted and forwarded to County decision makers. The Fox-Harbor Rentals application is not included in the Preferred Alternative.
88-21	The comment is noted and forwarded to County decision makers. The Garland application (as revised to change RW to RP instead of RW to RR) is included in the Preferred Alternative.
88-22	The comment is noted and forwarded to County decision makers. The Harris application is included in the Preferred Alternative.
88-23	The comment is noted and forwarded to County decision makers. The McCormick application is included in the Preferred Alternative.
88-24	The comment is noted and forwarded to County decision makers. The Porter application is included in the Preferred Alternative.
88-25	The comment is noted and forwarded to County decision makers. The Royal Valley is included in the Preferred Alternative as Urban Cluster Residential (UCR).
88-26	The comment is noted and forwarded to County decision makers. The Tallman application is included in the Preferred Alternative. The BOCC has noted in its authorization of the request that adjacent parcel patterns to the north and west of the applicant's property have similar RR designations.
88-27	The comment is noted and forwarded to County decision makers. The Trophy Lake Golf Course application is included in the Preferred Alternative.
Reed, Jim (see spreadsheet for comment)	
89-1	The comment is noted and forwarded to County decision makers. The site is zoned Rural Commercial (RCO) under Alternative 1 No Action and all studied alternatives including the Preferred Alternative. In 2010, the property was changed from HTC as part of the County's Year of the Rural project. The property was applied a commercial

Comment	Response
	designation outside the UGA, a rural commercial designation. Public comment opportunities were provided at that time including direct mail notification of rezones. The commenter's address was part of the mailing list.
Reed, Jim (letter comments dated 12/7/15)	
90-1	The comment is noted and forwarded to County decision makers. See Response to Comment 89-1.
90-2	The comment is noted and forwarded to County decision makers. See Response to Comment 89-1.
90-3	The comment is noted and forwarded to County decision makers. See Response to Comment 89-1.
90-4	The comment is noted and forwarded to County decision makers. See Response to Comment 89-1.
90-5	The comment is noted and forwarded to County decision makers. See Response to Comment 89-1.
90-6	The comment is noted and forwarded to County decision makers. See Response to Comment 89-1.
Rossi, Cynthia (Point No Point Treaty Council)	
91-1	The comment is noted and forwarded to County decision makers.
91-2	The comment is noted and forwarded to County decision makers. Please see Responses to Comment 33-1 and 33-2.
91-3	The comment is noted and forwarded to County decision makers. Please see Response to Comment 74-11.
91-4	The comment is noted and forwarded to County decision makers. Please see Responses to Comment 33-1 and 33-2.
91-5	Please see Response to Comment 33-22 regarding sewer plans for UGAs. Capital plans to expand solid waste, transportation, stormwater, and water supply facilities are also addressed.
91-6	Please see Draft SEIS Appendix G, Reasonable Measures, for a description of the proposed Transfer of Development Rights (TDR) amendments.
91-7	The comment is noted and forwarded to County decision makers. As part of developing the Preferred Alternative, the Comprehensive Plan Elements and Capital Facilities Plan are updated and evaluated in the Final SEIS. The Preferred Alternative is evaluated in terms of buildable lands using methods upheld by the Growth Management Hearings Board.
91-8	In developing the Draft SEIS the ecological restoration plans were considered and referenced in mitigation measures. Specific reference to salmon recovery plans are added to mitigation measures. See Response to Comment 74-12.
91-9	The comment is noted and forwarded to County decision makers.
91-10	The Draft SEIS addresses greenhouse gas emissions in Section 3.1.2. The Draft Comprehensive Plan Element policies address climate change. See Response to Comment 9-3,
91-11	The comment is noted and forwarded to County decision makers. Each reclassification request staff report address the presence of critical areas.
Satter, Allison (City of Bremerton)	
92-1	The comment is noted and forwarded to County decision makers.
92-2	The comment is noted and forwarded to County decision makers. Alternative 1 No Action tests a population figure that is consistent with City plans whereas Alternatives 2 and 3 address growth targets plus 5%. The Preferred

Comment	Response
	Alternative includes the City's population assumption of 13,757. The County's employment assumption is similar to the City's and a little higher (target plus 5% and Naval Base Kitsap jobs) for a conservative analysis.
92-3	The comment is noted and forwarded to County decision makers. The Preferred Alternative has growth assumptions similar to the City's assumption.
92-4	The comment is noted and forwarded to County decision makers. The map is from the Puget Sound Regional Council data. It is corrected in this Final SEIS.
92-5	The comment is noted and forwarded to County decision makers. The area near Enetai is proposed as Urban Restricted in the Preferred Alternative similar to Alternative 3.
92-6	The comment is noted and forwarded to County decision makers. The Preferred Alternative retains the East Bremerton UGA boundaries as presently adopted due to its urban density development and ability to extend sewer service.
92-7	The comment is noted and forwarded to County decision makers. Due to the balancing of growth and capacity and considering environment constraints around Kitsap Lake, the change to the West Bremerton UGA is small consisting of just a few lots with urban development.
92-8	The comment is noted and forwarded to County decision makers. No change to densities in the Rocky Point and West Hills are proposed in the Preferred Alternative.
92-9	The comment is noted and forwarded to County decision makers. The Preferred Alternative adds Urban Low (UL) Residential in place of Industrial in the Navy Yard City area.
92-10	The comment is noted and forwarded to County decision makers. While the long-term vision for Gorst includes medium density residential at the mine site, the site would retain its industrial designation until reclamation is proposed and until the population projections allow.
92-11	The comment is noted and forwarded to County decision makers. The Ryan application has been withdrawn. It was located along Gorst Creek and is presently zoned Urban Restricted due to the presence of the Gorst Creek floodplain.
92-12	The comment is noted and forwarded to County decision makers. The land added to the watershed is proposed for addition to the Bremerton UGA. It would not add growth capacity as it is for watershed purposes.
92-13	The comment is noted and forwarded to County decision makers. The Final Draft Comprehensive Plan issued in April 2016 includes the following proposed policy: "Land Use Policy 24. Explore policy intent with the City of Bremerton for the future of the Central Kitsap Urban Growth Area."
92-14	The comment is noted and forwarded to County decision makers. The Preferred Alternative does not change the rural designations along Barker Creek.
Seely, Jill	
93-1	The comment is noted and forwarded to County decision makers. See the Preferred Alternative boundary for the Phillips Road Area that reduces the UGA where critical areas are present and where property owners have requested to be excluded from the UGA.
Shandera, Jan	
94-1	The comment is noted and forwarded to County decision makers. Kitsap County has planned in collaboration with Kitsap Transit. The UGAs are intended to become denser to better support transit.

Comment	Response
94-2	The referenced billboards are located within the City of Port Orchard city limits. New billboards are not allowed Kitsap County jurisdiction. See Title 17 for details.
94-3	The South Kitsap Community Pool located on the campus of South Kitsap High School in Port Orchard is open Monday- Saturday for general swim and swim lessons. More information about hours and times is found on the South Kitsap School District (SKSD) Community Swimming Pool website .
94-4	<p>The restrooms located near the playground are open in the Spring through Fall, but are closed for the Winter Season from October 1st to March 31st.</p> <p>The County's park improvement standards include adding restrooms for active parks; as funding allows the County will complete installation of restrooms. Based on capital plans restrooms are planned for the park.</p>
Shattuck, Richard	
95-1	The comment is noted and forwarded to County decision makers. Some areas of Mixed Use are proposed to be Urban High (UH) Residential or Urban Restricted (UR) instead depending on environmental constraints Critical areas regulations will also apply to development applications to protect natural systems.
Shaw, Richard	
96-1	The comment is noted and forwarded to County decision makers. The land use and zoning designations are not proposed for change on the subject properties and would likely to continue to have both Urban Low and Urban Restricted zoning depending on environmental constraints on the property.
Shinberg, Sheila	
97-1	The comment is noted and forwarded to County decision makers.
Skrobot, Doug (McCormick reclassification report)	
98-1	The comment is noted and forwarded to County decision makers.
98-2	The comment is noted and forwarded to County decision makers.
98-3	<p>Comment noted. The intent of the Rural Wooded (RW) zone (KCC 17.301.010) is: "... to encourage the preservation of forest uses, retain an area's rural character and conserve the natural resources while providing for some rural residential use. This zone is further intended to discourage activities and facilities that can be considered detrimental to the maintenance of timber production. Residents of rural wooded (RW) residential tracts shall recognize that they can be subject to normal and accepted farming and forestry practices on adjacent parcels."</p> <p>The site is not in resource land of long-term commercial significance. It does have a wooded character. Zoning allows rural residential uses. The use of low impact development techniques would assist in retaining forest cover with rural residential uses at a higher density.</p>
98-4	The staff report indicates the proposed request is consistent with GMA and other county policies. See the staff reports most recently updated March 1, 2016 at the time of this writing, available: http://compplan.kitsapgov.com/Pages/LandUseReclassificationRequestDraftStaffReports.aspx .
98-5	See Response to Comment 98-3.
98-6	The criteria in the staff reports are those in the County's code (KCC Chapter 21.08) published and available to the applicant's and their representatives: http://www.codepublishing.com/WA/KitsapCounty/ .

Comment	Response
Stoican, Jon Michael	
99-1	The comments are noted and forwarded to County decision makers. The property is retained in the UGA in the Preferred Alternative as Urban Low (UL). The proposal for the corridor was to apply commercial zoning to existing commercial uses and UL elsewhere in order to balance growth capacity and targets.
Walter, Jim (Cornerstone Alliance Church)	
100-1	The comments are noted and forwarded to County decision makers. In accordance with KCC 17.460 non-conforming uses may continue to operate subject to limitations on the expansion of the non-conforming use. If the site-specific reclassification request is approved the property can continue to be used as a Church. If the Church use ceases for a period of 24 months the non-conforming use shall be considered abandoned and only permitted and conditional uses may be allowed.
Walton, Mike	
101-1	The comments are noted and forwarded to County decision makers. Please refer to the proposed Economic Development Element of the Comprehensive Plan Update.
Waters, Robert	
102-1	The comments are noted and forwarded to County decision makers. The property is retained in the UGA in the Preferred Alternative as Urban Low (UL). The proposal for the corridor was to apply commercial zoning to existing commercial uses and UL elsewhere in order to balance growth capacity and targets.
Webster, Cheryl and Keith	
103-1	The comments are noted and forwarded to County decision makers. The property is in an area consistently zoned as Rural Protection (RP) under all studied alternatives. It is recommended the commenter contact an attorney about the means by which property can be conveyed.



CITY OF PORT ORCHARD City Council

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RECEIVED

NOV 30 2015

KITSAP COUNTY DEPT OF
COMMUNITY DEVELOPMENT

November 24, 2015

Kitsap County DCD
Attn: Steve Heacock
MS-36
Port Orchard, WA 98366

RE: DEIS Comprehensive Plan Update 2016-2036

This comment letter has been drafted on behalf of a majority of Port Orchard City Council members in attendance at the Port Orchard City Council Meeting on November 24, 2015 in response to the draft supplemental Environmental Impact Analysis issued by Kitsap County on November 6th 2015.

The Port Orchard City Council held its first discussion of the DEIS at its November 15, 2015 work study meeting. The City Council was surprised to see that the draft supplemental EIS contained alternatives that significantly alter the Urban Growth Boundary (UGA) associated with the City of Port Orchard. While the City Council has held discussions previously concerning possible amendment to the UGA boundary, the Council has not requested any reduction to the UGA boundary surrounding the City of Port Orchard.

1-1

The City Council and City staff has not had sufficient time to review the 374 page (plus 8 appendices) November 6, 2015 DEIS and respectfully requests an extension of the comment period. The Port Orchard City Council respectfully requests the public comment period on the Draft Supplemental Environmental Impact Statement be extended for a period of 60 days, until January 22, 2016.

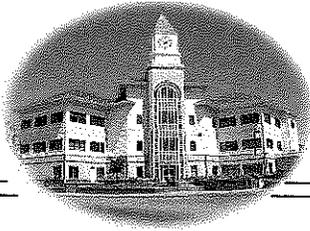
1-2

In the event that the County is unable to provide the City with additional review time, the City Council must support Alternative 1, the "no change alternative." Of particular concern under alternatives 2 and 3 are the removal of commercial and mixed use areas from the Port Orchard UGA and the subsequent down zoning within these areas.

1-3

Respectfully,


Council Member Bek Ashby



CITY OF PORT ORCHARD City Council

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Council Member Rob Putaansuu

Council Member John Clauson

Council Member Jerry Childs

Council Member Fred Chang

Council Member Cindy Lucarelli

Council Member Shawn Cucciardi

cc: Kitsap County Commissioners

Kitsap County Comprehensive Plan Update

Comments by Phil Best 12/7/2015

Page: pdf page (printed document page)

PAGE	SECTION/TOPIC	COMMENT	
3(iii)	Pictures	Swap picture of Chum (many in Kitsap) for Sockeye (not in Kitsap)	5-1
4(iv)	Planning Commission	Include missing members in list (Tom Nevins for example)	5-2
48(44)	(New) Environment Policy #20	Use tax incentives to protect beneficial open space, forestry, and agriculture areas through agreed commitments with willing landowners.	5-3
48(44)	(New) Environment Policy #21	Coordinate and share data with conservation land trusts and other voluntary organizations to identify and preserve priority areas for environmental protection and preservation.	5-4
66(62)	(New) Transportation Policy #30A	Design and implement methods of reducing and correcting non-point pollution of Puget Sound caused by surface water runoff from roads and parking areas.	5-5
66(62)	(New) Transportation Policy #30B	Hold contractors accountable for erosion and sewage spills occurring during construction of transportation facilities, and correct the problems caused by such incidents.	5-6
85(81)	CapF and Utilities Policy 27, Add:	Relocate the sewer pump station next to the Kitsap County Silverdale Waterfront Park to improve the visual impact, reduce sewage smells, minimize risk of pollution, and meet prior commitments to the community and park users.	5-7



PORT GAMBLE S'KLALLAM TRIBE
NATURAL RESOURCES DEPARTMENT
31912 Little Boston Rd. NE – Kingston, WA 98346

December 7, 2015

Kitsap County
Comprehensive Plan Update,
Planning and Environmental Programs Division,
Dept. of Community Development,
MS-36, 614 Division Street,
Port Orchard, WA 98366
compplan@co.kitsap.wa.us

Subject: Draft Supplemental EIS, Draft Comprehensive Plan Update 2016-2036

Dear Steve Heacock,

Thank you for the opportunity to comment on Kitsap County's draft Supplemental Environmental Impact Statement, Draft Comprehensive Plan Update, associated Draft Capital Facilities Plan, and Preliminary Land Use Reclassification Request Reports. On behalf of the Port Gamble S'Klallam Tribe's Natural Resources Department, I am submitting the following comments in support of Alternative 2 with recommendations related to cultural resources enhancement and protection, planning for the effects of climate change, and participation in the planning process for public services and utilities.

We support the County's Alternative 2 proposal, which represents a 4% net reduction of Urban Growth Area (UGA) lands and is consistent with the principles and directives of the Growth Management Act. Alternative 2 directs growth into UGA boundaries and promotes mixed uses and higher densities in centers and corridors, while protecting the rural character of the areas outside the UGA boundaries. We do not support the County's Alternative 3 proposal, which would result in a net 4% increase in UGA lands over the 20-year period.

9-1

Protecting Historic and Cultural Resources

Protecting Kitsap County's valued historic and cultural resources, including archeological resources, should be considered part of comprehensive planning for the next 20 years. By supporting opportunities for participation in cultural activities, and by advancing the protection of historic and cultural resources, the County will contribute toward improving the quality of life for its residents. The Draft Comprehensive Plan Update and SEIS did not include goals, plans or policies that would adequately protect and enhance these resources.

9-2

While the management of cultural resources crosses jurisdictional boundaries, the County may consider forming partnerships with Tribes, cultural organizations, residents and other entities, to coordinate plans for the preservation of cultural



PORT GAMBLE S'KLALLAM TRIBE
NATURAL RESOURCES DEPARTMENT
31912 Little Boston Rd. NE – Kingston, WA 98346

resources in the face of increasing population growth. Protecting these resources should be an integral part of County planning and community development. For example, project applicants should be required to consult with Tribes and cultural organizations as part of the County permitting process for development. The County should include cultural protection as one of the goals for its climate change, conservation, and parks programs and urban area plans. By promoting cultural education and opportunities for cultural activities that support diversity, cultural heritage and cultural tourism, the County will likely improve the social and economic vitality of its residents into the future.

Preparing for the Effects of Climate Change

The County makes a notable effort to limit greenhouse gas emissions through 2036 by setting targets and working to achieve them through land use, transportation and development strategies. However, the Draft Comprehensive Plan Update does not go far enough in planning for the effects of climate change. Addressing climate change is perhaps one of the most important challenges the County will face over the next 20 years and beyond, including the potential for significant environmental and economic impacts. Climate change has the potential to significantly effect natural and cultural resources, land use, human health and public safety. It is essential that the County address these issues now through the current Comprehensive Plan Update, since the next update in 2036 is likely to be too late for adequate preparation.

The County's Environment Policy 4 of the Comprehensive Plan Update requires the IRT or other entities to develop and implement climate change adaptation strategies that create more resilient communities against negative impacts of climate change. This policy and the Comprehensive Plan Update in general do not go far enough to describe the specific process and timeframe for this important work. The County should incorporate climate change planning in every aspect of the Comprehensive Plan Update and include specific steps for developing a Climate Action Plan that addresses local climate change impacts.

Rising sea levels and increased flooding events are anticipated, potentially changing the profile of our shorelines and floodways. The Comprehensive Plan Update should include policies and strategies for implementing a comprehensive assessment of risks to sea level rise and other environmental changes countywide. The plan should also include a process for developing policies and strategies that protect floodways, natural and cultural resources, public infrastructure and human health. Preparing for effects on stormwater, wastewater, water resources, salmon recovery, flooding risk, emergency management and other components of County planning are key in reducing our vulnerability to climate change.

9-3



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Planning Public Services and Utilities for Future Growth

The Comprehensive Plan Update and Capital Facilities Plan outline the need for increasing the capacity of public services and utilities to accommodate projected growth under each alternative. The details of the utility plan revisions are not presented in the Comprehensive Plan Update and Capital Facilities Plan, but general timeframes and strategies for developing the revisions are provided to some extent. The needed revisions include increasing solid waste capacity, additional sanitary sewer services, additional stormwater drainage systems, expanding water supply systems, and increasing transportation services.

While proposed mitigation measures for the effects of each alternative on public utilities have been identified in the SEIS, the details of the public utility revisions to accommodate population growth are not yet provided. The details of the utility plans are needed to fully determine the adequacy of the proposed mitigation measures and the capacity of the capital facilities to accommodate future growth. Therefore, the PGST Natural Resources Department would like to stay informed about these utility plans and to participate in the process for developing utility plan revisions that will address future population growth as they proceed. We appreciate the opportunity to continue working with the County and KPUD to review and comment on utility plan revisions as they are further developed. In addition, we would like to be involved in the County's climate change planning process as appropriate.

9-4

Thank you for your consideration of these comments. I look forward to reviewing the next drafts of the Comprehensive Plan Update and SEIS incorporating public comments. I would appreciate you keeping me informed about any related notices and distributions.

Sincerely,

Roma Call
Port Gamble S'Klallam Tribe
Natural Resources Department

TO - KITSAP COUNTY
DEPT. OF COMMUNITY DEV RECEIVED

Letter 10

DEC 07 2015

12-7-15

Kitsap County
Dept of Community Development

MY WIFE AND I, JAMES
& SERGIA CARDWELL RESIDING
AT 2720 S.E. BIELMEIER RD
PORT ORCHARD WA. 98367 AND
OWNING ADJACENT PROPERTIES
ON BIELMEIER RD OPPOSE
THE REALLOCATION OF COMMERCIAL
PROPERTIES IN SOUTH KITSAP
TO CENTRAL AND NORTH
KITSAP. FOR YEARS WE
HAVE BEEN ASSURED THE
BETHEL CORRIDOR WOULD
DEVELOP TO FOUR LANES. IT
HAS BECOME A TRAFFIC
NIGHTMARE AT TIMES. LOWES
WAS A PLUS BUT OTHER THAN
THAT PROGRESS IS AT A
STANDSTILL. PLEASE RECONSIDER
THE POTENTIAL LOSS OF MY
HOMETOWN SINCE 1968.
LET'S MAKE IT BETTER NOT WORSE.

10-1

SINCERELY

James & Sergia Cardwell
James & Sergia Cardwell
2720 S.E. BIELMEIER RD
Port Orchard WA. 98367

Tax Account 132301-4-034-2005

Dear Commissioner Gelder:

We always appreciate your attendance at our monthly SCAC meetings, and we were all glad you were at the October meeting to answer some questions from the public, but also to provide some feedback on expectations we have with the Complete Streets planning effort in Kingston. There was a mis-impression that it would be 'streetscape' planning, and now realize it is actually 'within the right-of-way' idea generation. We also heard some concern from you on whether or not Suquamish could use leftover funds from the Kingston planning effort.

11-1

Suquamish is unique in Kitsap County in being so complex jurisdictionally, with Kitsap County and the Suquamish Tribe each working to support their respective populations. The SCAC realizes that the Tribe's focus is on the tribal member population, with county responsibilities woven throughout due to checkerboarded ownership and public rights of way. Sometimes it must seem easier to just work on projects elsewhere to avoid confusion and possible confrontation ... but we see a stronger and richer community with both government entities working together. A place where this synergy will be most evident will be in downtown Suquamish, with Kitsap County road rights of ways weaving together mostly Tribe-owned properties. The Tribe timeline for redevelopment is at least ten years from now, according to Suquamish Tribe DCD. There is a strong feeling in the community that downtown Suquamish is languishing, and needs some planning attention - soon. The Complete Streets planning effort is thus more important than it might seem, because it could not only provide some ideas on immediate safety improvements, but also begin the planning dialogue with the Tribe as a participating partner, in a larger downtown vision. The timing for this sort of functional, place-driven collaboration is perfect for upcoming internal master planning efforts the Tribe is proposing. The SCAC concern is that we need a project to bring the Tribe and the County together. Downtown planning is ideal for this.

11-2

We hope you will agree with the SCAC that Suquamish is a richer, stronger community when the County and the Tribe working collaboratively. That will take leadership on both sides. Complete Streets may just be the project that could develop a shared vision for downtown Suquamish.

11-3

Respectfully,
Tom Curley

Chuck De Costa

Need to figure a way to keep taxes down for retirees. Cap their taxes after they reach 65 years old so you don't tax them out of their homes.

14-1

We need more good clean business in our area to create more jobs, like the NASCAR race track which was turned down. That would have been a great company to come into our area.

14-2

Cut back on land use regulations and rules and Codes like Title 2 and 5 that violate the rights of citizens. Make those Codes comply with our US Constitution and Bill of Rights as of now they do not follow our Constitution and they violate our due process rights and state we are guilty until we prove ourselves innocent and do not allow for Jury trials as provided for in the US Constitution. That would be a way to improve the lives of the people of Kitsap County.

14-3

There are way too many regulations on how us citizens can use their land. This should be the land of the free not the land of regulations. Stop all these new land use regulations the ones that are very intrusive like seasonal wet lands, regulations on what trees I can cut down and new boundary no cut zones at the periphery of my land. Try enforcing existing regulations for septic systems dumping raw sewage into the hood Canal. I turned in two properties that were doing just that and no action was taken as the people were poor and if you closed them down you would have to take care of them you thought, they are both young working couples just living in trash.

14-4

Do not force retroactively people to conform to "new codes" and laws or rules on existing properties like the Gun Club on Seabeck Hwy is being forced to comply with new rules or be shut down. It was grandfathered in by the County Board of Supervisors years ago and the new county Board of Supervisors are trying to make them conform to new County Code rules/permits retroactively, which is against our US Constitution of implementing retroactive laws against its people. Do not implement new requirement on existing homes in our area for the same reason.

14-5

Mary Earl Silverdale Sub Area Plan comments

Vision for Silverdale

In Land Use, meeting space and sidewalks should be included along with community gathering places and connecting through pedestrian friendly trails and paths respectively. | 17-1

Language should be added at the end of the paragraph “for new and redevelopment are fostered.” | 17-2

Economic Development

Language should be added to include tourism. Silverdale collects almost 85% of Kitsap’s Lodging tax. | 17-3

Governance “Within the 20 year planning horizon, Silverdale will be a self-governing city,” should perhaps be changed to a lower number since 20 was in the last version of this document and possibly the one before that. | 17-4

Capital Facilities “We have public facilities to support a vibrant and growing city” needs to reflect the vision. Currently, we do not have a community center nor are we a city. Capital facilities should include meeting rooms for public use, public parking garage, Park n Ride, and the Community Campus. | 17-5

Silverdale Sub Area Plan Goals and Policies

Land Use Silverdale Policy 7 Should include redevelopment | 17-6

Goal 3 “Encourage the status of Silverdale as a regional retail and service center and tourist destination.. | 17-7

Silverdale Policy 11 Encourage and support tourism activity and amenities as a significant contributor to the County’s economy. | 17-8

Silverdale Policy 17 Provide adequate Transportation infrastructure to serve a wide range of commercial, retail and tourism activity.” | 17-9

Goal 6 Support commercial development and redevelopment ...

Economic Development Silverdale Policy 11 Add tourist amenities | 17-10

Silverdale Policy 12 Add tourism | 17-11

Silverdale Policy 17 Add retail and tourism | 17-12

Silverdale Policy 18 Add businesses and industries | 17-13

Goal 6 In cluded redevelopment | 17-14

Transportation Silverdale Policy 21 Community priorities would suggest that a park n ride, transfer center, sidewalks and bike lanes in the regional center should be the focus before this new development. | 17-15

Goal 9 Develop a timeline for the Circulation Plan | 17-16

Silverdale Policy 28 Establish priorities and work on funding for completion of sidewalks and bicycle lanes free from mailboxes, street signs and other obstructions in the design district areas. | 17-17

Silverdale Policy 31 Encourage public/private development and maintenance of trails. | 17-18

Silverdale Policy 32 Develop and maintain an effective multimodal Transportation system for the Silverdale UGA. | 17-19

Silverdale Policy 33 Include park n ride and parking garage | 17-20

Mary Earl

Ron Eber

Here are some preliminary comments on the plan and multitude of documents.

1. Before any public hearings, there need to be some "detailed" briefing sessions open to the public like your other workshops where all the documents are reviewed, the connections are all explained and there can be an extended Q & A session. There simply is not adequate time to evaluate these materials at this time of year.

18-1

2. It appears that the proposed goals and policies are the same regardless of which alternative is chosen. This does not make sense with respect to the policies. They cannot provide the needed guidance for future growth and resource protection if such a wide diversity and range of options are possible. Policies should be tailored to provide specific guidance for each alternative.

18-2

3. With respect to the proposed site-specific plan and zone amendments, I do not believe the the analysis is adequate to justify the approval of any of them. Those that up zone land to a rural commercial or industrial designation have not adequately address the required standard that requires:

18-3

"Demonstration of an unmet need for the proposed land use designation in the rural area."

The proposed findings do not do this for the proposed "designations" in any specific way. It is not enough to just address a generalized need for the type of zone proposed but rather needs to address each and every use permitted with the proposed zones because any of these could eventually be approved under the new zone. Only by doing this can there be an adequate evaluation of an unmet need for any of these uses in the subject rural area. Regardless of what the applicant says they want to do, once the amendment is approved, they can then apply for any of the uses permitted in the applicable zone.

4. With respect to any amendments that increase the density of a rural residential designation that will permit the approval of new lots, none of these is appropriate. The County already has thousands of vacant lots and no need for anymore has been demonstrated that can possibly be consistent with the GMA.

18-4

Thanks for your consideration of these comments.

Comprehensive Plan input from Ron Gillespie
Page reference are taken from the CD purchased from DCD

Vision Statement: Be more direct in maintaining the quality of community, environment, and beauty of the area. Maintain a healthy balance between growth and environment. We could easily become a paved community; we also have to think about limited growth to help keep what we currently have.

22-1

Bullet points on **page 8** of Draft.

- Ensure compatibility between adjacent zones. *(I would like to know what this means – my interpretation is that you do not density build houses in an urban area next to a rural area for example, There should be a natural buffer between zones. This will take thoughtful planning and sensitivity to the quality of a neighborhood.)*
- Preserve open spaces, and recognized historical and archaeological resources to be preserved for future generations *(Don't tie open spaces to the historical and archaeological resources – put as separate bullet point...we shall establish and maintain open spaces both in a rural and urban setting. Land has to be set aside for maintaining a quality of life that people moved to the area for. Create walking and biking trails and buffers throughout the urban areas – plan them in do not let them happen by accident. Think about a natural setting in an urban area.)*
- Provide greater distinction between urban and rural areas *(The first thing that you should do is stop the urban grab – you need to reduce the urban area and seriously think about how to approach development in other parts of the county. You also need to let the land determine whether or not the designated number of houses is appropriate not the other way around and stop mitigating wetlands there is no evidence that this works. Wetlands are in an area because of nature so don't screw with it. Save the shoreline and create more access for people to enjoy.)*
- **ADD bullet Point: “Integrate natural features such as wetlands, riparian corridors and hillside views into site design as amenities and protect them as environmental resources.”**

22-2

22-3

22-4

Our Healthy Urban area needs to reflect some walkability, great landscaping it has to be aesthetic. Which means that **electronic signs should be prohibited**. The one in front of the bowling alley is disgusting there is no reason to exempt schools and churches from having electronic signs either. The rural character can also be reflective of open spaces not just agriculture etc. (Last paragraph on page add open spaces.)

22-5

Page 9 and 10: I agree whole heartedly with the last sentence: “A key to maintaining Kitsap’s character is preserve existing open space in rural areas and promote opportunities for provision of new open space in rural areas.” However I would also extend some of this philosophy to Urban areas as well. There is a need for openness and natural environments in urban as well. Parks, walking and biking trails, buffer zones,

22-6

protecting the shoreline and creeks etc. These tend to go to the wayside when developers want to clear the land and DCD allows this because of the GMA and zoning. Common sense is lost – if it does not fit the land don't force it just because of zoning. There are many wetlands included in the urban areas and they will all be wiped out because of the density requirement.

22-6
Conti.

Page 10 Quoting RCW 36.7-0A.070 (5) is good but what does it mean? Under current DCD leadership it means put as many houses as allowed. Compatibility is an alien word in current code enforcement and application. Make a code that is clear and understandable by all and most importantly enforced.

22-7

The County allows mitigation of wetlands which is an affront to nature. The CAO needs to protect these not allow for engineers and developers to just wipe them aside with this concept of mitigation. Add this to your statement: “Integrate natural features such as wetlands, riparian corridors and hillside views into site design as amenities and protect them as environmental resources.”

22-8

To keep the rural nature of the area county, Urban growth areas should be limited in size not extensive. Over reach is the problem with the Urban Growth Plan. All of the land to the South of Bucklin Hill Rd and west of Tracyton Blvd should be rural and not urban.

22-9

Page 12 Land Use Policy 1. ”Establish specific development standards for medium-and high-density developments to ensure compatibility adjacent to existing low-density neighborhoods.” This sounds good but what does it mean. Currently the Director of DCD has defined Compatibility as “does it meet zoning requirements” not whether it fits within the neighborhood. A sense of community is not even on the radar in DCD decision-making. All of this sounds good but when it is applied the good part of it just seems to evaporate and the simple logistics take over. You need to be more specific as to what you mean.

22-10

Page 13 Add a Land Use Policy 12 under Goal 1 that deals with the school district's ability to build schools where there is an established student population need within an existing developed community.

22-11

Goal 2 current policy 12...Do not depend just on existing trails, paths and sidewalks but plan on developing these where they do not currently exist to promote openness, walkability and bike routes that are off the road.

22-12

Page 14 Goal 5: Needs to be reworded. Take **Facilitate and encourage** out! The people will decide if they want to be annexed. The County will provide the required information but should not be taking a stand and this goal as stated basically pits the county against some of the concerns of the community. The County needs to be neutral in this and provide the people the factual information about what the impacts of their decision will be. Silverdale is not a city and should not be considered as one in this plan.

22-13

Page 15 under Land Use Policy 24. Strike the following from the next to last bullet point. “~~agreements of no protest to future annexation for properties that are not contiguous; offering pre-annexation agreements to property owners interested in annexation and needing assurances for the city about services, planning or other issues;~~” All of this sounds like the developer has all of the power and the people none. Let the people decide and do not make pre-agreements that impact the community’s right to make a decision nor the county’s right to challenge something.

22-14

Page 18 policy 45 bullet 2: take **reduce** out and replace with **prohibit**. If you do not want it do not allow it.

22-15

Page 19 Land Use Policy 46: **Do not encourage** development practices etc. **Ensure** that these practices are followed. All of this permissive language just weakens what you say you want to accomplish – grow a pair.

22-16

Policy 49: Should read **Business growth is limited to Type III LAMIRDS**. Take encourage off what you have written.

22-17

Policy 51: Add a bullet point talking about the potential need for school development

22-18

Page 20: Goal 14: There needs to be something in here to protect our river and streams from pollution. Also to keep cattle from polluting streams there needs to be some type of buffer.

22-19

Page 30: Under the Economic Development Goals and Policies there should be some mention of supporting quality schools in the area. This is a high draw for many people.

22-20

Page 43: Policy14: LID is to be used in areas appropriate for LID practices. Many areas in Kitsap county are not appropriate due to the till and soil conditions. Do not force LID practices on lands that are not appropriate. DCD practices need to adhere to this.

22-21

Policy 15: Wetlands mitigation should be prohibited anything else is a cop out. What is the scientific evidence that this works? Don’t toss science out on the one hand to say that we are using best practices and literally tossing it out on the other hand by ignoring it.

22-22

Page 44: Policy 17: Prohibit private docks that screw up the shoreline.....especially private docks in rural areas. The shorelines beauty is not enhanced one bit etc.

22-23

Page 45: strategy 3: Require depth in the SEPA report not just a simple check list that a 6 year old or in that case a developer can fill out in a drunken stupor.

22-24

Strategy 5 and 6: As a result of this report be able to put a temporary/permanent hold on development that indicates that the natural environment is not being given equal weight and/or consideration.

Page 47: at the end of the first paragraph you need to add something like this “And to maintain the goal of balancing economic growth and development with the rural character of the county. The goal of the Comp Plan is not to urbanize the county but to help maintain the qualities that make the county desirable while meeting reasonable growth needs. There is a limit as to how much population that can be assimilated before we become another Tacoma thus a disciplined approach needs to be established.”

22-25

Page 48: “is a vision of the County to allow flexible development standards for housing being proposed in the vicinity of critical areas to reach both goals of meeting housing targets and environmental protection.” I do not know what this means! If you want environmental protection than do no allow housing within the vicinity of critical areas - set some distance criteria. What is flexible” development standards”?? All I know is that to get money the DCD will allow almost anything they can get away with.

22-26

Is there any concept that is floating around that says what an appropriate cap to population might be for our area? Just because we might get 80.438 people does not mean that we have to build our county to death to accommodate this. What about 2,000,000 or more do we just say to hell with it everything is torn down for housing??? Maybe home ownership is not the question but other types of housing techniques. All I know is that as I look west across dyes Inlet I see swaths of trees being torn down and developments going up. To make that all urban is to strip the natural beauty away. Nice planning that would be...a contradiction to one of your goals and vision statement.

22-27

Page 48: “Throughout the 20-year plan period the County will continue to partner with and **encourage require** developers to provide for open space, in association with new housing developments. Integration of housing and open space **will be a priority to be located new employment opportunities.**” ???(reword) If you want something to happen require it otherwise developers will be looking for the biggest bang for their bucks.

22-28

Your comprehensive plans does a lot of encouraging but encouraging does not have any teeth. If you want to meet some of your goals you will have to do more than encourage. If for example growth occurs outside of areas with sufficient public facilities etc.: what would be the limitations and requirements on these developments?

22-29

Page 50 Policy 2: Remove **unnecessary** regulatory barriers to alternative housing models for people experiencing homelessness. (Add unnecessary)

22-30

Policy 5: Can you provide an example of regulatory strategies to incentivize and provide flexibility ...

22-31

Policy 7: Again explain what this means? “Adopt regulatory changes to allow non-traditional housing types.”

22-32

Policy 8: Needs to be tightened up – there is a lot of unused County properties and the the phrase “Wherever possible and appropriate” needs to be clarified and made more specific. Who makes these decisions??????

22-33

Page 51 Policy 12: Add unnecessary “Identify and remove [**unnecessary**] regulatory barriers that limits access to or the provision of a diverse affordable housing supply.”

22-34

Policy 16. Ensure that all residents have an equal and fair opportunity to access human services **via public transportation**, regardless of race, religion, gender, sexual **Add bolded section.**

22-35

General comment. If your zoning request goes through the picture shown at the bottom of the page will mostly be barren of trees and have houses on the hillside. Fortunately you put most of the property west of Tracyton Blvd as rural but east is designated as urban and you can kiss the trees good-bye.

22-36

Page 55 In your examples you used tiny houses twice.

22-36

Page 57 bullet point 2: “**avoid Do not allow for the concentrating of** people and commercial/industrial areas in sensitive areas, to minimize need for development of transportation systems in such areas,” Again, if you are going to protect the areas do not allow for permissive language... I have learned that from dealing with Mr. Keeton.

22-37

Page 58 under Goal 1: Add a Policy 6 here that deals with the development of walking and biking trails (off-road) that ties the urban and rural areas together – areas that utilize non-motorized modes of transportation as well as walking/running. This concept should be applied to all the goals in transportation. We talk about walkability but we are doing little to enhance it. Got to Goal 9 it sounds good.

22-38

Page 69 Add a bullet point that talks about requiring open spaces, train connectivity etc. in new developments. This has to be built into our thinking.

22-39

Page 70 policy 7 – take the “is” out
Policy 10: “Identify open space corridors [**and areas**] within and between urban growth areas.” ***Parks within an urban area are needed and add to the quality of life especially if you are looking at greater density.***

22-40

Page 71 Policy 17: Needs to be worded more strongly. This has to be incorporated into the initial development of properties as well as covenants. The county needs to be proactive here when granting development requirements.

22-41

Page 72 Policy 21: Add Urban centers as well

22-42

Page 77 Cap F and U Policy 5: Add “and ahere to” “Continuously review [and ahere to] stormwater regulations and design manuals to ensure that Kitsap County is meeting the most up-to-date Best Management Practices and changes in state and federal stormwater regulations.” *The potential for technical deviations etc. tend to undermined this policy statement.*

22-43

Page 77 The Did you Know section should also point out that LID practices on soils not suited for such practices should not be done to control stormwater runoff other techniques need to be used.

22-44

Page 81 Policy 22. Add “only after a public hearing process” -“Allow for amendments to the Land Use Map, Plan policies, and implementing regulations consistent with Growth Management Act, Countywide Planning Policies, applicable plan policies and other requirements of federal, state and/or local laws[**only after a public hearing process**]....”

22-45

Page 82 adding a Policy 34 under Goal 10 to encourage underground utilities as much as possible. This will negate the need for above ground power poles and utilities should coordinate these activities with road and other improvements being made.

22-46

Page 105 Governance: The voters by over 70 percent rejected the concept of Silverdale being a city. This statement tosses that vote right back into the voters’ faces. This iteration of the Comprehensive Plan needs to take this statement out and let the voters’ position stand. In 20 years we will look at it again. I do not want the county to be working towards this because it is in the comprehensive plan and ignores the voters’ intent. Voters for at least the last 20 years have rejected incorporation and this last vote is recent enough that you need to respect it.

22-47

Page 106 Capital Facilities – Silverdale does not have all the public facilities to support a vibrant and growing city – no police force, no City Hall- Not support for maintaining the infrastructure needs of the area. All it is is a group of businesses without a sense of community. The only thing that links the community right now is the school system.

22-48

Page108 Goal 3 add a Policy 12: **To maintain the urban/rural atmosphere of the area Electronic Signs shall be prohibited and exemptions for schools and churches shall be removed.**

22-49

Because the voters rejected the incorporation of Silverdale a number of times it is appropriate that none of the Goals under the sub area plan deal with governance. The vision for Silverdale governance should therefore be changed to that of a vibrant County Urban Center as opposed to a city.

22-50

Page 117 add Policy 8 to Goal 1: Electronic Signage will be prohibited.

22-51

Policy 14 is great this should be incorporated into county development goals.

22-52

Page 120 Policy 34 first bullet add NO ELECTRONIC SIGNAGE

22-53

Page 122 and 123: Here we are trying to be energy efficient and we allow electronic signage. No Electronic Signage

22-54



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

Mailing Address: 600 Capitol Way North, Olympia, WA 98501-1091 • (360) 902-2200 • TDD (360) 902-2207
Main Office Location: Natural Resources Building, 1111 Washington Street SE, Olympia, WA

Wednesday, November 25, 2015

Kitsap County Planning and Environmental Programs Division
Department of Community Development
MS-36, 614 Division Street
Port Orchard, Washington 98366

RECEIVED

NOV 30 2015

KITSAP COUNTY DEPT OF
COMMUNITY DEVELOPMENT

SUBJECT: Kitsap County Draft Comprehensive Plan Update

The Washington Department of Fish and Wildlife (WDFW) appreciates the opportunity to review the Draft Comprehensive Plan Update. We have reviewed this document and have a few comments at this time.

Chapter 3- Environment

Environmental Goal 3, Policy 12. This policy identifies a policy for maintenance, review, and revision of scientific maps and data to provide information during development review and planning. We recommend that this policy be revised to include a complete inventory of County-wide habitat resources, including streams, wetlands, and shorelines. This inventory could also include other features, such as barriers to fish passage and could be completed through coordination with other public, private, and non-profit entities.

23-1

Environmental Goal 3, Policy 15. This policy states that compensatory mitigation shall be the last option of resort in mitigation sequencing. We recommend that this policy be supplemented to include stricter enforcement of mitigation sequencing, such as better demonstration of efforts to avoid and minimize impacts to the natural environment during development.

23-2

Environmental Goal 3, General. We recommend that the County consider including a goal to establish a certified mitigation bank in Kitsap County. Certification of mitigation banks through the Department of Ecology increases the effectiveness of the mitigation bank by analyzing which functions the bank can effectively replace and which functions are irreplaceable and should be preserved or restored in-place. Recent science indicates that mitigation banks can provide large-scale benefits on a watershed scale and provide a good alternative to small isolated mitigation sites.

23-3

Chapter 8- Subarea Plans

Silverdale Sub Area Plan, General. This section does not include goals related to the natural environment. The Silverdale Sub Area contains many natural resources, including streams, wetlands, riparian areas, and shorelines. We recommend that this section be expanded to include goals related to the natural environment and the specific resources available in the Silverdale Sub Area.

23-4

Silverdale Regional Center. SRC Environmental Goal 11, Policy 51. This policy encourages the development of boardwalks or walking paths in riparian corridors. While this type of development promotes health and recreation opportunities, we encourage the County to recognize that even seemingly passive uses can result in environmental

23-5



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

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impacts. For example, heavy trail use by pedestrians and pets can discourage wildlife from seeking refuge in the few remaining natural corridors within the heavily urbanized Silverdale area. We recommend that this policy be implemented in conjunction with riparian restoration and enhancement to minimize impacts to the natural environment. Additionally, we encourage the County to consider lower impact alternatives during trail design. For example, trail mainstems could be located outside riparian buffer areas, with smaller spur trails extending into buffer areas for stream and wildlife observation. This would create less disturbance within the buffer area than locating the entire trail mainstem within the buffer.

23-5
cont.

Thank you for considering these comments in your review. Please contact me at (360) 895-4756 to discuss any questions you might have.

Sincerely,

A handwritten signature in cursive script that reads "Brittany N. Gordon".

Brittany N. Gordon

WDFW Habitat Biologist

Brittany.gordon@dfw.wa.gov



RECEIVED

NOV 30 2015

KITSAP COUNTY DEPT OF
COMMUNITY DEVELOPMENT

State of Washington
DEPARTMENT OF FISH AND WILDLIFE

Mailing Address: 600 Capitol Way North, Olympia, WA 98501-1091 • (360) 902-2200 • TDD (360) 902-2207
Main Office Location: Natural Resources Building, 1111 Washington Street SE, Olympia, WA

Wednesday, November 25, 2015

Kitsap County Planning and Environmental Programs Division
Department of Community Development
MS-36, 614 Division Street
Port Orchard, Washington 98366

SUBJECT: Draft Supplemental Environmental Impact Statement for Kitsap County 2016 Comprehensive Plan Update

The Washington Department of Fish and Wildlife (WDFW) appreciates the opportunity to review the Draft Supplemental Environmental Impact Statement for Kitsap County 2016 Comprehensive Plan Update.

In general, we feel that the proposed alternatives concentrate development in appropriate areas and are protective of the County's more pristine habitats and natural resources. Due to the overall reduction in Urban Growth Areas, Alternative 2 would be preferred over Alternative 3. We have a few site-specific comments as well, which are addressed below.

23-6

Silverdale Urban Growth Area

Under Alternative 3, the properties along Trigger Avenue would be rezoned from Rural Commercial to Business Center. This area contains a forested riparian corridor, through which the west fork of Clear Creek flows. This is documented spawning habitat for Coho salmon and also has documented presence of Fall Chinook and Fall Chum salmon. The Business Center zoning would support higher intensity land uses in this area, which could result in impacts to Clear Creek and fish life through buffer impacts, increased stormwater runoff and pollution, increased disturbance, and habitat fragmentation. Additionally, forested corridors provide important refuge habitat for wildlife in urban areas, such as Silverdale.

23-7

Bremerton East Urban Growth Area

Under Alternative 2, the Illahee greenbelt would be expanded, while under Alternative 3, the zoning would change from Urban Low Residential (5-9 DU/Ac) to Urban Restricted (1-5 DU/Ac). While both alternatives are more protective of shoreline habitat than under existing zoning, we prefer Alternative 2 because it offers increased protection to an important shoreline. This shoreline is known spawning habitat for surf smelt, which spawn on intertidal beaches. Additionally, this area includes a salmon-bearing stream; bald eagle nests; habitat for hardshell clam, geoduck, and Pacific herring; and estuarine and marine intertidal habitat. This shoreline also provides many water-related recreational opportunities for fishing, boating and kayaking, and enjoying the scenic beaches.

23-8

Thank you for considering these comments in your review. Please contact me at (360) 895-4756 to discuss any questions you might have.

Sincerely,
Brittany Gordon

Brittany N. Gordon
WDFW Habitat Biologist
Brittany.gordon@dfw.wa.gov



State of Washington
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Wednesday, November 25, 2015

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MS-36, 614 Division Street
Port Orchard, Washington 98366

RECEIVED

NOV 30 2015

KITSAP COUNTY DEPT OF
COMMUNITY DEVELOPMENT

SUBJECT: Kitsap County Land Use Reclassification Draft Staff Reports

The Washington Department of Fish and Wildlife (WDFW) appreciates the opportunity to review the Draft Comprehensive Plan updates and the proposed land use reclassification applications. We have reviewed the Land Use Reclassification Request Draft Staff Reports and have the following comments at this time. The primary intent of these comments is to identify potential species and habitats that could be affected by proposed higher intensity land uses. We hope that this supplemental information will assist the County's evaluation of these proposals.

Nonresidential

Permit Number: 15 00522. This application proposes the site zoning be changed from Urban Reserve (URS) (except for 1 parcel located in the incorporated City of Bremerton) to Rural Industrial (RI) with Mineral Resource (MR) overlay. According to the WDFW SalmonScape database, the property contains one perennial stream, which is a tributary to Kitsap Lake, and is documented rearing habitat for Coho salmon. In addition, the SalmonScape database identifies two intermittent streams on the property, which may have fish use during the wet season. Furthermore, the Priority Habitats and Species database identifies freshwater forested/shrub wetlands associated with the streams, which may provide additional habitat for fish, amphibians, and other species. The site is located on the edge of a large forested habitat corridor. The proposed zoning change would support a higher intensity land use at the site, which could result in impacts to the streams and fish life through increased disturbance, buffer impacts, pollution, runoff, and other industrial and mineral resource activities that could occur under the proposed zoning. Additionally, allowing higher intensity land uses in this area could encourage future development encroachment into the undeveloped forested habitat to the west.

23-9

Permit Number: 15 00607. This application proposes the site zoning be changed from Rural Residential (RR) to Rural Industrial (RI). According to the WDFW SalmonScape database, the property contains Scandia Creek, which is a perennial stream. Coho spawning habitat is documented on the property, as well as fall chum and winter steelhead presence. The proposed zoning change would support higher intensity land uses at the site, which could result in impacts to the stream and fish life through increased disturbance, buffer impacts, pollution, runoff, and other industrial activities that could occur under the proposed zoning.

23-10

Permit Number: 15 00378. This application proposes the site zoning be changed from Rural Residential (RR)/Rural Protection (RP) to Neighborhood Commercial (NC). According to the WDFW SalmonScape database, the property is adjacent to Grovers Creek, a perennial stream with documented Coho salmon presence. According to the Priority Habitats and Species database, the property may contain wetlands associated with Grovers Creek and its floodplain;

23-11



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these wetlands may provide fish habitat such as rearing habitat for juvenile Coho salmon. The proposed zoning change would support higher intensity land uses at the site, which could result in impacts to the stream and fish life through increased disturbance, buffer impacts, pollution, runoff, and other commercial activities that could occur under the proposed zoning. Additionally, including this parcel as part of the George's Corner Limited Area of More Intense Development (LAMIRD) would expand the LAMIRD and could encourage future land use conversions or nonconforming uses on adjoining parcels, eventually resulting in commercial sprawl.

23-11
cont.

Permit Number: 15 00689. This application proposes the site zoning be changed from Rural Protection (RP) to Rural Commercial (RCO). According to the WDFW SalmonScape database, Dogfish Creek is located in the southeast corner of the property. This is a perennial stream with documented Coho salmon presence. The proposed zoning change would support higher intensity land uses at the site, which could result in impacts to the stream and fish life through increased disturbance, buffer impacts, pollution, runoff, and other commercial activities that could occur under the proposed zoning.

23-12

Permit Number: 15 00701. This application proposes the site zoning be changed from Urban Restricted (UR) to Industrial (IND). According to the WDFW SalmonScape database, Steele Creek is located on the property and is a perennial stream with documented Coho salmon presence. The proposed zoning change would support higher intensity land uses at the site, which could result in impacts to the stream and fish life through increased disturbance, buffer impacts, pollution, runoff, and other industrial activities that could occur under the proposed zoning.

23-13

Permit Number: 15 00380. This application proposes the site zoning be changed from Urban Restricted (UR) to Highway Tourist Commercial (HTC). According to the WDFW SalmonScape database, Gorst Creek is located on the property. This is a perennial stream with documented Fall Chinook spawning, Coho spawning, Fall Chum spawning, and Winter Steelhead spawning habitat. The proposed zoning change would support higher intensity land uses at the site, which could result in impacts to the stream and fish life through increased disturbance, buffer impacts, pollution, runoff, and other commercial activities that could occur under the proposed zoning.

23-14

Residential

Permit Number: 15 00686. This application proposes the site zoning be changed from Rural Wooded (RW) to Rural Residential (RR). According to the WDFW SalmonScape database, a fish bearing stream is located on the property. This stream is identified as habitat for Coho salmon. Additionally, the Priority Habitats and Species database identifies a large freshwater emergent wetland associated with the stream on the property. This wetland may provide fish habitat as well. The proposed zoning change would encourage residential development at the site, which contains a relatively contiguous expanse of mature native forest habitat, in addition to stream and open water wetland habitat. This could result in impacts to fish and wildlife through increased disturbance, clearing, habitat fragmentation, buffer impacts, pollution, runoff, and other activities that could occur under the proposed zoning.

23-15

Permit Number: 15 00714. This application proposes the site zoning be changed from Rural Wooded (RW) to Rural Residential (RR). According to the WDFW SalmonScape database, a perennial stream is located on the property; this

23-16



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stream is a tributary to Coulter Creek, a fish bearing stream. The proposed zoning change would encourage residential development at the site, which contains a relatively contiguous expanse of mature native forest habitat, in addition to stream habitat. This could result in impacts to fish and wildlife through increased disturbance, clearing, habitat fragmentation, buffer impacts, pollution, runoff, and other activities that could occur under the proposed zoning.

23-16
cont.

Thank you again for the opportunity to review these staff reports. Please contact me at (360) 895-4756 to discuss any questions you might have.

Sincerely,

A handwritten signature in cursive script that reads "Brittany N. Gordon".

Brittany N. Gordon

WDFW Habitat Biologist

Brittany.Gordon@dfw.wa.gov

Comments – Chapter 2, Economic Development – GENERAL COMMENTS

In October, Visit Kitsap Peninsula (VKP) submitted comments for consideration and inclusion in the 2016-2036 Kitsap County Comprehensive Plan Update. The comments covered specific Goals & Policies related to Chapter 2 - Economic Development, as well as other sections in the Comprehensive Plan, directly related to addressing Kitsap Tourism industry.

At present, Kitsap County looks to the Kitsap Economic Development Alliance (KEDA) for guidance as noted in KEDA's contract (2015 Budget Document – Outside Agency) with Kitsap County, and as described on page 37 of the 2006 Comp Plan draft. Under Strategy 1 – 3, KEDA is listed as the primary agency to provide economic development for all jurisdictions and to “partner with other agencies and organizations to update, revise and create policies and programs as warranted to support target industry sectors.”

Tourism is “target industry sector’ and cluster recognized by Kitsap County, KEDA and the Puget Sound Regional Council (see attached PSRC Tourism & Visitor Cluster Profile). As stated on page 31 of the Comprehensive Plan draft, Economic Development Goal 2 will support “...economic opportunities consistent with local and regional plans”.

While KEDA does include a reference to the tourism sector in its sales brochures, website, power point presentations and 2015 Work Plan (page 5, Lead Initiatives – Focus on Business) there is no other references to reflect the contribution and potential of the tourism sector to achieve County goals.

In a recent email to the VKP, KEDA staff acknowledged the agency is not directly involved in Kitsap's tourism sector and affirmed that the County should look to the VKP for guidance related to the 2036 Comprehensive Plan update. The VKP appreciates KEDA's willingness to acknowledge that the VKP has the expertise to provide Kitsap County with the necessary guidance to “create policies and programs as warranted to support target industry sectors”, which includes tourism.

Based on this input, the VKP would like the opportunity to submit a Work Plan for Kitsap's tourism industry that can be included in the 2036 Comprehensive Plan as a point of reference.

Based on input from a wide range of stakeholders, including Russell Steele, CEO, Port Madison Enterprises, the VKP would also like to request Kitsap County's 2036 Comprehensive Plan Update include overarching Goals and Policies related to Kitsap tourism sector that would broadly cover all sections of the 2036 Comp Plan and jurisdictions. This would be in addition to individual references such as in Chapter 8 – Sub Area Plans/Kingston Goals & Policies; on page 93, Kingston Economic Development Goal 3, “Support tourism to enhance the local economy”, and on page 108, Silverdale Sub-Area Plan/Goal 3/Policy 11 “Encourage and support tourism activity as a significant contributor to the Silverdale economy.” We appreciate there may be other references as well.

While we appreciate that the current Comprehensive Plan Update, does include additional mentions of tourism, it still does not provide it the status; i.e. specific and dedicated Goals & Policies as afforded other targeted industry sectors.

Following is a dedicated Tourism Goal & Policies submitted in October (via email) for inclusion in the Economic Development section. As requested, we are re-submitting using the online portal for general comments. We will use the general email to provide additional comments and support documents.

Submitted by Visit Kitsap Peninsula, Board of Director
Patricia Graf-Hoke, Director

Email from KEDA: On Oct 30, 2015, at 11:10 AM, Kathy Cocus wrote:

See comments below. KEDA focuses on all primary business with the exclusion of tourism and I'm happy to review Patty's additions for the comp plan. And ... it has been proven that CEOs and business owners visiting an area often leave considering it as a new business location. Attention to tourism is a vital part of a business recruitment plan. Kathy

2035 KITSAP COUNTY COMPREHENSIVE PLAN UPDATE

ECONOMIC DEVELOPMENT – AMENDMENT/ADDITION CONSIDERATIONS.

Economic Development Goal 1. Promote a healthy and diverse economy that provides for a strong and diverse tax base, encourages business formation, retention, and expansion; creates industrial and professional business and employment opportunities to attract new business to the County.

Economic Development Policy #. Kitsap County will work to allocate funding for long-term economic development. Kitsap County recommends a cooperative partnership among the County, cities, tribal governments, port and local districts, the Kitsap Economic Development Alliance (KEDA), and the private sector, to share in the costs relating to industrial, commercial, technology, tourism, business retention, expansion, startup and recruitment activities. Kitsap County recommends that each agency increase and prioritize its business retention, expansion, startup and recruitment activities. (of course – good catch!)

NEW TOURISM SPECIFIC GOAL & POLICIES - CONSIDERATIONS

Economic Development Goal # (TBD). Support Kitsap's growing tourism industry to facilitate economic diversity, development and employment that value, preserve and promote Kitsap County's natural, cultural, historic and recreation assets for the enjoyment of residents and visitors.

Economic Development Policy #. Consider, Identify and support county-wide tourism development, growth and opportunities consistent with

Kitsap County goals and policies.

Economic Development Policy #. Work with the official county tourism agency, Visit Kitsap Peninsula, port districts, private sector, other qualified tourism related entities and user groups to identify current and potential visitor and event amenities and services.

Economic Development Policy #. Support development and funding of tourism/visitor programs to stimulate access, utilization and sustainable economic benefit for county owned parks and event facilities.

26-1
cont.

Economic Development Policy #. Develop partnerships to facilitate collaboration among government, private, nonprofit and individual entities to finance and support tourism development, strategies and programs.

Economic Development Policy #. Encourage department and staff to work with local tourism resources to identify potential visitor amenities, partnerships and economic benefits during planning process.

We recommend that there be an over arching Goal & Policy for the Transportation section that references the importance of including tourism/visitor traffic during the development and planning related to local and regional transportation and non-motorized projects.

27-1

LAND USE - CONSIDERATIONS.

Land Use Goal 6: Direct development to designated growth Urban Growth Areas consistent with projected population and economic development growth, Growth Management Act and Countywide Planning Policies while considering development patterns that use urban land more efficiently and that incorporate innovative and sustainable practices when feasible.

NEW - Land Use Policy #: Work with local economic and tourism agencies to consider and identify current and future (tourism related) economic development opportunities in Urban Growth Areas.

28-1

Land Use Goal 7: Preserve and develop shorelines in a manner that allows for an orderly balance of uses by considering the public and private use, along with the development of shorelines and adjacent land areas with respect to the general distribution, location and extent of such uses and development.

NEW - Land Use Policy #: Consider and identify opportunities to increase public access and foster environmental and economic benefits associated with Kitsap Peninsula National Water Trails and designation as part of the National Water Trails System.

Land Use Goal 8: Preserve and protect features of historic, archaeological, cultural, scientific, educational and economic value or significance through coordination and consultation with the appropriate local, state and federal authorities, affected Indian tribes, and property owners, through non-regulatory means.

NEW - Land Use Policy #: Consider and identify economic opportunities and benefits to facilitate access, maintenance, development and potential acquisition in planning decisions.

NEW - Land Use Goal #TBD: Consider and identify economic development opportunities and benefits related to other established industry sectors including tourism.

Land Use Policy # - Work with local, regional and state business, economic and tourism agencies to identify potential opportunities consistent with Kitsap County land use, environment and quality of life goals.

Land Use Goal 13. Protect Kitsap County's unique rural character.

NEW - Land Use Policy # - Consider and identify the vital connection between protection of Kitsap County's rural character and assets and current and future environmental benefits and economic opportunities.

Land Use Goal 14. Identify new and preserve existing open space in rural areas.

NEW - Land Use Policy # - Work with residents, user, environmental and business groups to consider opportunities to increase public access that are consistent with Kitsap County goals, respect the environment, facilitate economic and maintenance benefits.

Land Use Goal 16. Develop adequate rural public facilities and services to support local agriculture.

NEW - Land Use Policy # - Consider and identify current and potential economic opportunities and benefits to agriculture and agricultural-related businesses for the enjoyment of residents and visitors.

PARKS, RECREATION & OPEN SPACE - CONSIDERATIONS

NOTE: these comments were submitted for review by Jim Dunwiddie, Director, and forward to the Comp Plan Team.

Parks Goal 1. Provide regional parks, and open space to meet the active and passive regional recreational needs

NEW: Parks Recreation and Open Space Policy #. Work with qualified tourism and business entities to consider and identify current and future opportunities for public access to natural recreation assets and potential economic benefits that respect county goals and policies.

Parks Goal 2. Provide appropriate and necessary funding and resources to support access, management and maintenance of parks, facilities, and

28-1
cont.

29-1 See
attachments

30-1

open space lands of the highest quality possible.

NEW: Parks Recreation and Open Space Policy #. Work with qualified local private sector, tourism and non-profit entities and user groups to consider and identify current and potential economic and enterprise opportunities compatible with county goals and regulations.

With regard to Kingston Sub--Area Plan, page 93, Policy 12; "Foster partnerships...to promote tourism and business development". We recommend that this become an over arching Goal or Policy for the Tourism Sector in general that applies to all jurisdictions and private, public and non-profit organizations vs listing specific entities. An over arching Goal & Policies would then also apply to all communities served by Kitsap County that may not be identified in the sub-area plan (Seabeck, Olalla, etc.)

Tourism & Visitors Cluster Profile

Central Puget Sound Region of King, Kitsap, Pierce & Snohomish Counties

29-1 -
attachments



2014 Regional Employment Estimate¹: 116,306 Location Quotient: 0.96



The Tourism & Visitors cluster consists of a broad range of services and attractions that help draw tourists to the region. The **Arts, Culture & Sports, Recreation, Casinos,** and **Water Passenger Transportation** subsectors offer attractive activities that benefit both visitors and residents, increasing the regional quality of life. The **Lodging** subsector provides services for those visiting the region, and the **Travel Services** subsector helps facilitate visits to the region. The **Restaurants & Bars** subsector offers eating and drinking establishments that are supported by both visitors and residents.

Subsectors & Employment

Workers in the Restaurants & Bars subsector make up nearly half of the employment in this cluster. The Arts, Culture & Sports subsector is the second largest employer, accounting for nearly a quarter of the sector's employment. The vast majority of workers in the cluster perform food service roles, making up more than two-thirds of total employment and working across many of the cluster's subsectors. Other workers in this cluster perform support roles for the businesses and associated facilities.

Tourism & Visitors Subsector
➤ Restaurants & Bars - Full service restaurants and drinking establishments
➤ Arts, Culture & Sports - Establishments involved in the performing arts, cultural institutions, and spectator sports
➤ Lodging - Hotels, bed and breakfast inns, and recreational vehicle parks and campgrounds
➤ Recreation - Outdoor recreation facilities, including golf and country clubs, skiing facilities, marinas, amusement parks, etc.
➤ Travel Services - Travel agencies, tour operators, and convention and visitors bureaus
➤ Casinos - Casinos and gambling facilities
➤ Water Passenger Transportation ² - Transportation of people over water for travel and sightseeing purposes

Cluster Employment by Subsector³

Subsector	%
Restaurants & Bars	48%
Arts, Culture & Sports	23%
Lodging	12%
Recreation	8%
Travel Services	4%
Casinos	3%
Water Passenger Transportation ²	2%

Cluster Employment by Occupation⁴

Occupation	%
Food Service	69%
Other	9%
Personal Care	6%
Building Maintenance	5%
Administrative Support	4%
Sales	4%
Management	3%

¹ Source: PSRC Covered Employment Estimates, See 2012 Regional Economic Strategy for complete industry cluster definition

² Water Passenger Transportation subsector also related to Maritime and Transportation & Logistics clusters

³ Source: EMSI 2011 complete employment estimates

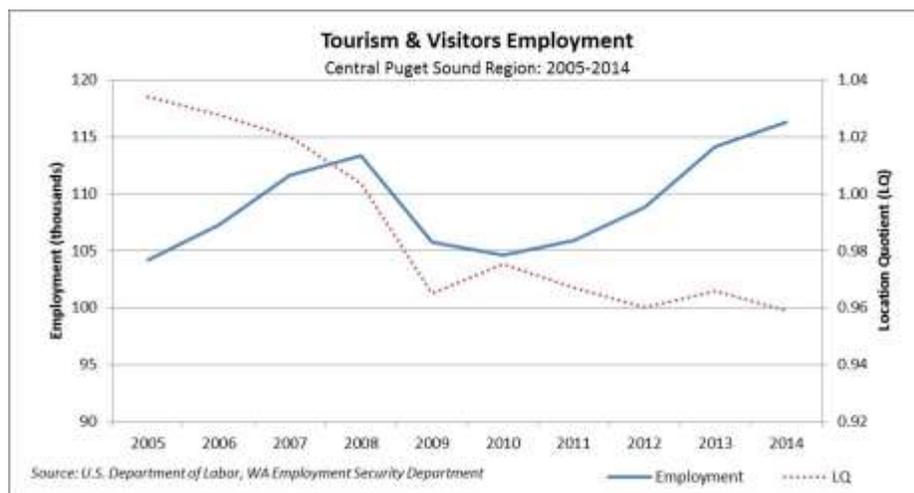
⁴ Source: WA ESD 2013 estimates

Competitiveness

The region is below national averages for employment levels in the Restaurants & Bars and Lodging subsectors. Because these two subsectors account for nearly two-thirds of total cluster employment, this drives overall location quotient for the cluster, being slightly below the national average. However for more traditional “attraction” based subsectors, the region stands out. Water Passenger Transportation, Casinos, and Recreation, show significant regional employment concentrations and the region is a top MSA for each. In addition, all three of these subsectors are projected to see double digit employment growth in the U.S. between 2012 and 2022.

LQ ⁵	Subsector	Top 6 U.S. MSAs ⁶
0.99	Restaurants & Bars U.S. jobs in the “Food services and drinking places” sector are projected to increase in the U.S. by 9% ⁷	<ul style="list-style-type: none"> • New York, NY • Los Angeles, CA • Chicago, IL • Dallas, TX • Washington, DC • Houston, TX
1.07	Arts, Culture & Sports U.S. jobs in the “Arts, entertainment, and recreation” sector are projected to increase by 11% ⁷	<ul style="list-style-type: none"> • Las Vegas, NV • New York, NY • Los Angeles, CA • Orlando, FL • Miami, FL • Chicago, IL
0.68	Lodging U.S. jobs in the “Accommodation” sector are projected to increase by 10% ⁷	<ul style="list-style-type: none"> • Las Vegas, NV • New York, NY • Los Angeles, CA • Miami, FL • Orlando, FL • Chicago, IL
1.52	Recreation U.S. jobs in the “Amusement, gambling, and recreation industries” sector are projected to increase by 12% ⁷	<ul style="list-style-type: none"> • New York, NY • Sacramento, CA • Summit Park, UT • Los Angeles, CA • Seattle, WA • Chicago, IL
1.93	Travel Services U.S. jobs in the “Travel arrangement and reservation services” sector are projected to decrease by 12% ⁷	<ul style="list-style-type: none"> • Phoenix, AZ • Miami, FL • New York, NY • Los Angeles, CA • Dallas, TX • Orlando, FL
4.95	Casinos U.S. jobs in the “Amusement, gambling, and recreation industries” sector are projected to increase by 12% ⁷	<ul style="list-style-type: none"> • Seattle, WA • Los Angeles, CA • Chicago, IL • Riverside, CA • Las Vegas, NV • San Diego, CA
7.11	Water Passenger Transportation² U.S. jobs in “Water transportation” and in “Scenic and sightseeing transportation and support activities for transportation” are each projected to increase by 19% ⁷	<ul style="list-style-type: none"> • Miami, FL • Los Angeles, CA • Seattle, WA • Honolulu, HI • New York, NY • Orlando, FL

■ = Concentration > U.S. Average ■ = Concentration < U.S. Average



⁵ Source - 2012 Location Quotients: U.S. Cluster Mapping (<http://clustermapping.us>), Institute for Strategy and Competitiveness, Harvard Business School. Copyright © 2014 President and Fellows of Harvard College. All rights reserved. Research funded in part by the U.S. Department of Commerce, Economic Development Administration.

⁶ Source - 2012 Employment Totals, Top 6 MSAs by total employment: U.S. Cluster Mapping

⁷ Source - 2012-2022 Employment Projections: U.S. Bureau of Labor & Statistics

Earth Economics - January 2015 - Produced by WA State

Table F-1 County Economic Expenditures and Contribution Results for All Recreational Lands

The following tables do not include equipment expenditures. Counties do not total to the Washington

State total due to region-specific modeling.

Table F-1. Economic Contribution Results, By County

	County	Total Expenditures * (000's)	Economic Contribution (000's)	Multiplier	Employment	State and Local Tax (000's)
1	KING	\$5,441,083	\$4,552,283	0.84	50,191	\$310,612
2	PIERCE	\$2,252,445	\$1,612,372	0.72	0.72	\$176,352
3	SNOHOMISH	\$2,073,726	\$1,225,092	0.59	0.59	\$150,405
4	SPOKANE	\$1,308,264	\$1,177,345	0.90	0.90	\$118,766
5	CLARK	\$1,186,068	\$719,141	0.61	9,229	\$54,096
6	WHATCOM	\$705,093	\$584,754	0.83	0.83	\$62,712
7	THURSTON	\$755,537	\$476,050	0.63	0.63	\$58,735
8	KITSAP	\$694,367	\$467,113	0.67	6,461	\$37,533
9	BENTON	\$743,771	\$451,326	0.61	7,074	\$32,518
10	YAKIMA	\$669,931	\$433,425	0.65	0.65	\$55,037
11	SKAGIT	\$479,877	\$349,972	0.73	0.73	\$38,281
12	CHELAN	\$341,811	\$298,912	0.87	3,843	\$22,942
13	CLALLAM	\$355,841	\$245,335	0.69	3,709	\$19,635
14	GRAYS HARBOR	\$343,267	\$218,642	0.64	2,900	\$16,885
15	JEFFERSON	\$317,207	\$215,059	0.68	3,335	\$276,772
16	ISLAND	\$358,610	\$211,909	0.59	3,321	\$18,187
17	LEWIS	\$326,661	\$205,140	0.63	2,398	\$25,206
18	COWLITZ	\$359,701	\$191,957	0.53	2,625	\$15,683
19	GRANT	\$301,300	\$161,617	0.54	2,187	\$13,094
20	OKANOGAN	\$222,002	\$151,343	0.68	1,819	\$18,646
21	STEVENS	\$235,766	\$125,812	0.53	0.53	\$18,133
22	SKAMANIA	\$199,386	\$120,784	0.61	0.61	\$15,873
23	MASON	\$255,196	\$118,927	0.47	1,614	\$16,272
24	KITTITAS	\$185,325	\$118,805	0.64	1,762	\$9,459
25	PACIFIC	\$176,860	\$107,385	0.61	1,364	\$13,354
26	WALLA WALLA	\$159,949	\$94,593	0.59	0.59	\$11,504
27	SAN JUAN	\$121,776	\$94,363	0.77	0.77	\$10,557
28	FRANKLIN	\$205,464	\$81,959	0.40	1,114	\$5,942
29	KLICKITAT	\$155,499	\$74,242	0.48	1,110	\$5,836
30	DOUGLAS	\$136,057	\$68,267	0.50	932	\$5,660
31	WHITMAN	\$146,083	\$67,389	0.46	0.46	\$9,417
32	ASOTIN	\$80,375	\$41,817	0.52	622	\$3,365
33	FERRY	\$82,572	\$26,855	0.33	381	\$2,438
34	LINCOLN	\$48,343	\$23,397	0.48	272	\$3,179
35	ADAMS	\$49,305	\$21,760	0.44	342	\$2,133

36	PEND OREILLE	\$68,066	\$19,736	0.29	0.29	\$2,829
37	GARFIELD	\$42,113	\$19,433	0.46	427	\$1,632
38	COLUMBIA	\$29,925	\$15,049	0.50	220	\$1,227
39	WAHIAKUM	\$20,717	\$6,710	0.32	0.32	\$1,057
	WASHINGTON	21,635.34	\$20,520,858			\$2,010,992.00

Kitsap sees major increase in lodging revenue for October

POSTED: 9:08 AM, Nov 24, 2015

UPDATED: 9:13 AM, Nov 24, 2015

Kitsap County hoteliers posted record increases for the month of October. According to Smith Travel Reports, which track national data for the lodging industry, Kitsap County posted the largest increases in sales revenue, demand, and per-room rate among all reporting counties in Washington.

Revenues in October were up 41.2 percent, or nearly \$1 million over the same period last year, and the year-to-date increase in 2015 is 20.4 percent for \$5.6 million in additional lodging revenue this year.

As of Oct. 31, Kitsap hoteliers had generated more than \$33 million in lodging sales. Clark County had the next-largest increase with revenue up 16.4 percent over 2014. The state average increase in revenue was 11.4 percent.

Demand for rooms in Kitsap in October was up 35.2 percent over last year and 16.5 percent year to date, which translates into visitors booking 49,405 more hotel rooms from January through October 2015 than in 2014. The next closest increase was reported by Pierce County at 11 percent.

As revenue and bookings increased, the number of rooms in Kitsap was up only 2 percent this year, below the state average for supply increase of 3.9 percent. In addition, the occupancy rate at area hotels is up 32.5 percent and the average room rate has increased 38.4 percent.

The data is provided by Visit Kitsap Peninsula. VKP director Patricia Graf-Hoke attributes the record numbers to corresponding increases in leisure travelers visiting Kitsap, non-government business travelers, and visitors attending private events. Unlike government travelers that must adhere to lower, GSA per-diem rates, leisure travelers pay higher room rates.

According to a study by the Puget Sound Regional Council, the tourism industry in Kitsap region generates more than 6,700 jobs, a trend Visit Kitsap Peninsula expects to continue.

Visit Kitsap Peninsula (www.VisitKitsap.com) (<http://www.VisitKitsap.com>) is the official, state-recognized agency responsible for economic development and promotion in Kitsap's tourism industry.

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Kitsap sees major increase in lodging revenue for October

POSTED: 9:08 AM, Nov 24, 2015

UPDATED: 9:13 AM, Nov 24, 2015

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KITSAP TOURISM SECTOR UPDATE TO the BOARD of COUNTY COMMISSIONERS

October 28, 2015 – Reported by Visit Kitsap Peninsula

MORE GOOD ECONOMIC NEWS:

According to the Smith Travel Industry Report for September, **Kitsap County is again ranked #1** among WA counties for the largest % increase in revenue generated by lodging sales as well as the largest % increase in room demand over 2014.

As noted in the attached chart, revenues for September 2015 are up 25.3% over 2014, **or \$785,409.00 for the month**. The state average for increased revenues was up just 9%.

Demand for rooms in Kitsap County in September 2015 are up 18.1% or 5,987. The state average for increased demand was up just 4.2%.

Year to Date, Kitsap County is #1 for the largest increase in room demand at 14.7% or 40,273 more rooms sold as of September 30, for only the 1st, 2nd and 3rd quarters of 2015.

Year To Date, lodging revenues for Kitsap County are up 18.4%, second only to Clark County (Vancouver WA market) for a very positive economic impact of **\$4,646,546.00 in new revenue**. The state average for increased revenues YTD was up just 11.8%.

REGIONAL PARTNERSHIPS

Visit Kitsap Peninsula was invited by the Port of Seattle to join 15 other WA State Destination Marketing Organization (WSDMO) members to meet with major travel agencies from the United Kingdom. The private event, held at the closed Seattle Art Museum, offered the VKP the vehicle to provide information about Kitsap's remarkable visitor assets during one-on-one presentations. The response from UK representatives was extremely positive. All were impressed with Kitsap's surprisingly close proximity to the Seattle and access to a very natural environment with minimal time in transit.



This event also served to strengthen Kitsap's image as a cooperative regional partner with the Port of Seattle and Visit Seattle opening the door to even more opportunities to work with industry leaders and to attract international travelers to Kitsap County. Attached is the handout created by the VKP for the event.

The Port of Seattle also invited the VKP to submit photos of the Kitsap regional for consideration on large interior murals to be featured in the newly remodeled area of the Seattle-Tacoma International Airport.

On behalf of the VKP Board of Directors, many thanks to the BOCC for its continued support of Kitsap County's tourism sector and important region-wide tourism marketing programs.

Visit Kitsap Peninsula
the Natural Side of Puget Sound

Tab 3 - Multi-Seg Raw
WSDMO use by members only
For the Month of October 2015

Currency: USD - US Dollar

PROVIDED BY VISIT KITSAP PENINSULA - NOT TO BE USED WITHOUT PERMISSION

	Current Month - October 2015 vs October 2014									Year to Date - October 2015 vs October 2014								
	Supply			Demand			Revenue			Supply			Demand			Revenue		
	2015	2014	% Chg	2015	2014	% Chg	2015	2014	% Chg	2015	2014	% Chg	2015	2014	% Chg	2015	2014	% Chg
Washington	2,823,201	2,716,375	3.9	1,906,066	1,798,469	6.0	231,153,401	207,503,812	11.4	27,241,202	26,560,932	2.6	19,274,737	18,428,649	4.6	2,418,625,395	2,164,819,046	11.7
Adams County, WA																		
Asotin County, WA																		
Benton County, WA	92,132	82,491	11.7	50,884	50,282	1.2	4,465,276	4,234,813	5.4	873,892	808,944	8.0	561,729	515,376	9.0	50,106,731	44,963,240	11.4
Chelan County, WA	79,081	79,081	0.0	50,146	50,446	-0.6	5,349,922	5,093,170	5.0	772,084	768,082	0.5	483,913	482,143	0.4	51,682,066	49,707,075	4.0
Clallam County, WA	44,888	44,888	0.0	23,731	22,447	5.7	2,271,632	2,041,273	11.3	438,106	438,106	0.0	269,714	254,132	6.1	28,711,722	26,035,357	10.3
Clark County, WA	87,296	83,731	4.3	63,801	58,723	8.6	6,410,702	5,520,981	16.1	835,249	797,441	4.7	623,738	565,669	10.3	63,887,968	51,927,147	23.0
Columbia County, WA																		
Cowlitz County, WA	33,077	33,077	0.0	16,963	15,970	6.2	1,182,667	1,074,958	10.0	324,368	324,399	-0.0	187,063	180,339	3.7	13,493,507	12,409,228	8.7
Douglas County, WA																		
Ferry County, WA																		
Franklin County, WA	30,008	29,977	0.1	18,294	19,402	-5.7	1,434,571	1,497,744	-4.2	294,029	278,416	5.6	187,337	180,316	3.9	15,046,967	13,945,115	7.9
Garfield County, WA																		
Grant County, WA	44,516	44,516	0.0	20,939	22,838	-8.3	1,542,500	1,647,490	-6.4	440,021	440,021	0.0	233,102	241,258	-3.4	18,392,373	18,604,885	-1.1
Grays Harbor County, WA	65,069	65,069	0.0	34,600	33,468	3.4	3,255,191	2,949,789	10.4	638,096	638,159	-0.0	361,768	362,111	-0.1	36,065,832	33,554,353	7.5
Island County, WA																		
Jefferson County, WA																		
King County, WA	1,113,396	1,069,779	4.1	863,477	808,570	6.8	132,140,060	116,217,179	13.7	10,742,022	10,500,304	2.3	8,599,967	8,268,098	4.0	1,371,665,254	1,209,846,056	13.4
Kitsap County, WA	52,483	51,429	2.0	35,810	26,478	35.2	3,323,604	2,353,967	41.2	518,464	500,432	3.6	349,522	299,917	16.5	33,165,663	27,549,513	20.4
Kititas County, WA	34,441	34,596	-0.4	20,696	19,312	7.2	2,248,970	2,035,026	10.5	337,899	339,264	-0.4	193,633	190,488	1.7	22,181,414	20,997,715	5.6
Klickitat County, WA																		
Lewis County, WA	29,667	29,667	0.0	14,865	15,082	-1.4	1,129,598	1,086,348	4.0	290,928	293,928	-1.0	160,364	156,387	2.5	12,526,065	11,422,164	9.7
Lincoln County, WA																		
Mason County, WA																		
Okanogan County, WA																		
Pacific County, WA																		
Pend Oreille County, WA																		
Pierce County, WA	179,738	180,172	-0.2	119,078	107,300	11.0	10,893,538	9,678,393	12.6	1,727,257	1,752,208	-1.4	1,217,973	1,146,560	6.2	117,261,328	105,237,118	11.4
San Juan County, WA																		
Skagit County, WA	49,631	49,631	0.0	26,760	30,043	-10.9	2,374,674	2,620,775	-9.4	486,704	486,704	0.0	324,209	325,812	-0.5	31,055,087	29,880,179	3.9
Skamania County, WA																		
Snohomish County, WA	187,054	182,497	2.5	128,495	121,871	5.4	13,149,977	12,203,287	7.8	1,830,659	1,757,818	4.1	1,311,062	1,286,735	1.9	140,309,333	131,637,605	6.6
Spokane County, WA	240,529	213,776	12.5	145,178	134,670	7.8	14,122,180	12,822,439	10.1	2,237,658	2,103,073	6.4	1,435,091	1,361,383	5.4	144,726,715	131,410,093	10.1
Stevens County, WA																		
Thurston County, WA	77,996	75,702	3.0	47,124	45,481	3.6	4,423,414	4,281,479	3.3	746,329	742,549	0.5	486,792	456,522	6.6	47,075,585	42,132,554	11.7
Wahkiakum County, WA																		
Walla Walla County, WA	31,000	27,125	14.3	19,128	17,713	8.0	2,025,840	1,858,768	9.0	303,337	266,000	14.0	170,551	159,202	7.1	17,539,626	16,097,761	9.0
Whatcom County, WA	85,591	74,710	14.6	45,644	43,472	5.0	4,188,103	4,000,457	4.7	792,147	733,244	8.0	506,320	463,565	9.2	49,496,797	44,206,069	12.0
Whitman County, WA	20,429	20,429	0.0	12,298	12,016	2.3	1,487,707	1,432,717	3.8	200,336	184,616	8.5	114,663	103,901	10.4	12,113,819	10,484,049	15.5
Yakima County, WA	86,831	86,924	-0.1	53,035	50,476	5.1	4,549,884	4,245,076	7.2	851,502	852,683	-0.1	518,429	481,845	7.6	44,272,742	41,026,349	7.9

A blank row indicates insufficient data.

Source 2015 STR, Inc.

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Tab 2 - Multi-Segment

WSDMO - for use by members only
For the month of: October 2015

Currency: USD - US Dollar

PROVIDED BY VISIT KITSAP PENINSULA - NOT TO BE USED WITHOUT PERMISSION

	Current Month - October 2015 vs October 2014												Year to Date - October 2015 vs October 2014										Participation						
	Occ %		ADR		RevPAR		Percent Change from October 2014						Occ %		ADR		RevPAR		Percent Change from YTD 2014						Properties		Rooms		
	2015	2014	2015	2014	2015	2014	Occ	ADR	RevPAR	Room Rev	Room Avail	Room Sold	2015	2014	2015	2014	2015	2014	Occ	ADR	RevPAR	Room Rev	Room Avail	Room Sold	Census	Sample	Census	Sample	
Washington	67.5	66.2	121.27	115.38	81.88	76.39	2.0	5.1	7.2	11.4	3.9	6.0	70.8	69.4	125.48	117.47	88.79	81.50	2.0	6.8	8.9	11.7	2.6	4.6	1023	574	91071	71527	
Adams County, WA																													
Asotin County, WA																													
Benton County, WA	55.2	61.0	87.75	84.22	48.47	51.34	-9.4	4.2	-5.6	5.4	11.7	1.2	64.3	63.7	89.20	87.24	57.34	55.58	0.9	2.2	3.2	11.4	8.0	9.0	33	27	2972	2607	
Chelan County, WA	63.4	63.8	106.69	100.96	67.65	64.40	-0.6	5.7	5.0	5.0	0.0	-0.6	62.7	62.8	106.80	103.10	66.94	64.72	-0.2	3.6	3.4	4.0	0.5	0.4	44	16	2551	1436	
Clallam County, WA	52.9	50.0	95.72	90.94	50.61	45.47	5.7	5.3	11.3	11.3	0.0	5.7	61.6	58.0	106.45	102.45	65.54	59.43	6.1	3.9	10.3	10.3	0.0	6.1	28	9	1448	696	
Clark County, WA	73.1	70.1	100.48	94.02	73.44	65.94	4.2	6.9	11.4	16.1	4.3	8.6	74.7	70.9	102.43	91.80	76.49	65.12	5.3	11.6	17.5	23.0	4.7	10.3	30	27	2816	2623	
Columbia County, WA																													
Cowlitz County, WA	51.3	48.3	69.72	67.31	35.75	32.50	6.2	3.6	10.0	10.0	0.0	6.2	57.7	55.6	72.13	68.81	41.60	38.25	3.7	4.8	8.7	8.7	-0.0	3.7	21	10	1067	704	
Douglas County, WA																													
Ferry County, WA																													
Franklin County, WA	61.0	64.7	78.42	77.20	47.81	49.96	-5.8	1.6	-4.3	-4.2	0.1	-5.7	63.7	64.8	80.32	77.34	51.18	50.09	-1.6	3.9	2.2	7.9	5.6	3.9	13	6	968	677	
Garfield County, WA																													
Grant County, WA	47.0	51.3	73.67	72.14	34.65	37.01	-8.3	2.1	-6.4	-6.4	0.0	-8.3	53.0	54.8	78.90	77.12	41.80	42.28	-3.4	2.3	-1.1	-1.1	0.0	-3.4	32	10	1436	763	
Grays Harbor County, WA	53.2	51.4	94.08	88.14	50.03	45.33	3.4	6.7	10.4	10.4	0.0	3.4	56.7	56.7	99.69	92.66	56.52	52.58	-0.1	7.6	7.5	7.5	-0.0	-0.1	37	9	2099	699	
Island County, WA																													
Jefferson County, WA																													
King County, WA	77.6	75.6	153.03	143.73	118.68	108.64	2.6	6.5	9.2	13.7	4.1	6.8	80.1	78.7	159.50	146.33	127.69	115.22	1.7	9.0	10.8	13.4	2.3	4.0	263	197	35916	33098	
Kitsap County, WA	68.2	51.5	92.81	88.90	63.33	45.77	32.5	4.4	38.4	41.2	2.0	35.2	67.4	59.9	94.89	91.86	63.97	55.05	12.5	3.3	16.2	20.4	3.6	16.5	21	13	1693	1284	
Kittitas County, WA	60.1	55.8	108.67	105.38	65.30	58.82	7.6	3.1	11.0	10.5	-0.4	7.2	57.3	56.1	114.55	110.23	65.65	61.89	2.1	3.9	6.1	5.6	-0.4	1.7	16	12	1111	974	
Klickitat County, WA																													
Lewis County, WA	50.1	50.8	75.99	72.03	38.08	36.62	-1.4	5.5	4.0	4.0	0.0	-1.4	55.1	53.2	78.11	73.04	43.06	38.86	3.6	6.9	10.8	9.7	-1.0	2.5	17	6	957	507	
Lincoln County, WA																													
Mason County, WA																													
Okanogan County, WA																													
Pacific County, WA																													
Pend Oreille County, WA																													
Pierce County, WA	66.3	59.6	91.48	90.20	60.61	53.72	11.2	1.4	12.8	12.6	-0.2	11.0	70.5	65.4	96.28	91.79	67.89	60.06	7.8	4.9	13.0	11.4	-1.4	6.2	69	39	5798	4415	
San Juan County, WA																													
Skagit County, WA	53.9	60.5	88.74	87.23	47.85	52.81	-10.9	1.7	-9.4	-9.4	0.0	-10.9	66.6	66.9	95.79	91.71	63.81	61.39	-0.5	4.4	3.9	3.9	0.0	-0.5	30	8	1601	656	
Skamania County, WA																													
Snohomish County, WA	68.7	66.8	102.34	100.13	70.30	66.87	2.9	2.2	5.1	7.8	2.5	5.4	71.6	73.2	107.02	102.30	76.64	74.89	-2.2	4.6	2.3	6.6	4.1	1.9	68	45	6034	5110	
Spokane County, WA	60.4	63.0	97.27	95.21	58.71	59.98	-4.2	2.2	-2.1	10.1	12.5	7.8	64.1	64.7	100.85	96.53	64.68	62.48	-0.9	4.5	3.5	10.1	6.4	5.4	70	46	7759	6707	
Stevens County, WA																													
Thurston County, WA	60.4	60.1	93.87	94.14	56.71	56.56	0.6	-0.3	0.3	3.3	3.0	3.6	65.2	61.5	96.71	92.29	63.08	56.74	6.1	4.8	11.2	11.7	0.5	6.6	25	20	2516	1942	
Wahkiakum County, WA																													
Walla Walla County, WA	61.7	65.3	105.91	104.94	65.35	68.53	-5.5	0.9	-4.6	9.0	14.3	8.0	56.2	59.9	102.84	101.12	57.82	60.52	-6.1	1.7	-4.5	9.0	14.0	7.1	14	10	1000	873	
Whatcom County, WA	53.3	58.2	91.76	92.02	48.93	53.55	-8.4	-0.3	-8.6	4.7	14.6	5.0	63.9	63.2	97.76	95.36	62.48	60.29	1.1	2.5	3.6	12.0	8.0	9.2	39	21	2761	2098	
Whitman County, WA	60.2	58.8	120.97	119.23	72.82	70.13	2.3	1.5	3.8	3.8	0.0	2.3	57.2	56.3	105.65	100.90	60.47	56.79	1.7	4.7	6.5	15.5	8.5	10.4	9	5	659	492	
Yakima County, WA	61.1	58.1	85.79	84.10	52.40	48.84	5.2	2.0	7.3	7.2	-0.1	5.1	60.9	56.5	85.40	85.14	51.99	48.11	7.7	0.3	8.1	7.9	-0.1	7.6	38	18	2801	1496	

A blank row indicates insufficient data.

Source 2015 STR, Inc.

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Comments on 2016 Kitsap County Draft Comprehensive Plan.

Contributed by Scott Hall

The following comments address the topic of agriculture, agriculture accessory uses, the marketing, value adding, distribution, processing of agricultural products, and agri-tourism.

NOTE: In general, the topic of agriculture and/or "food systems" appears in numerous places throughout the 2016 draft Comprehensive Plan Review, hereafter referred to in these comments as the 2016 review. The topic of agriculture/food systems appears in the following sections of the 2016 review: Land use, Economic Development, Housing and Human Services, and Capital Facilities and Utilities. Comments appropriate to each section are separated and grouped by section

Section, Land Use:

Goal 14 states: "Preserve and expand land suitable for agricultural production within the county through regulatory and non-regulatory means". While the "goal" itself, as written, has a high degree of merit, and should, in fact, be a goal for the county to strive for, it creates an expectation which may not be supported by the attendant land use policies for this goal.

32-1

At present, in the 2016 review, and in all past county adopted Comprehensive Plans there is no means through zoning, districting, overlaying, or any form of formally adopted comprehensive map to identify (a) any land currently being used for agriculture, (b) any land the county wishes to see preserved as agricultural land, (c) any land deemed "suitable" for agricultural production, (d) any land protected by regulation as to its primary use as agricultural land, (e) any land not presently in agricultural production which the county might like to see come into agricultural production.

32-2

With no means within the text of the Comprehensive Plan(land use policy(ies)) to identify agricultural land, much less measure its existing quantity, or suitability for agricultural production, it is not possible to determine if the existing "suitable" agricultural production land base is being preserved or expanded.

32-3

Through the development/adoption of the "Kitsap County Strategic Agriculture Plan and Inventory" (SAPI) it has been found that although agricultural use of the land is very common, and growing in term of numbers of agricultural operators, the county has been very reluctant to formally identify any land within the county as Agricultural Resource Land (ARL), i.e., land of long-term commercial agricultural significance. Owing to this, there is no land identified anywhere in the county either within the body of the Comprehensive Plan, or on any associated

32-4

comprehensive plan land use/zoning designation map where the recognized primary use of the land is for agricultural production purposes.

32-4
cont.

The State, through the GMA provides quite specific means to identify land suitable for inclusion as ARL, and compels each county required to plan under GMA to protect ARL from unnecessary conversion to other land uses. When Kitsap County made its initial determination regarding ARL, it used the relative quantity of what was then considered commercial agricultural activity (number of "commercial farms") as the primary factor for finding no land worthy of ARL designation. This was instead of applying the GMA criteria regarding lands suitability for commercial agricultural production, whether or not land found suitable under the criteria was currently being used for agricultural production. The SAPI makes note of the apparent inconsistency between Kitsap County and other jurisdictions with respect to ARL designation. The SAPI contains a strategy regarding re-examining whether ARL, or some functional equivalent designation may be appropriate for some lands in Kitsap County.

32-5

Given that Land Use Goal 14 specifically addresses preserving and expanding land suitable for agricultural production within the county, one or more attendant land use policies must address (a) the quantity, and (b) the suitability factors supporting the overall goal statement.

Some examples might include something similar to:

Example land use policy XX: Re-examine, and if required adopt/amend criteria used to determine if land meeting Growth Management Act designation criteria as Agricultural Resource Land (ARL) exists within the county. If it is found there is land matching the criteria, such land shall be mapped in some manner, and considered for inclusion into specific agricultural zoning, agricultural districting, agricultural use focus areas, or their equivalent.

32-6

Example land use policy XX: For land not meeting Growth Management Act Agriculture Resource Land (ARL) designation, adopt criteria for allowing the land owner to "opt in" to a mapping system showing land either (a) used primarily for agricultural production, (b) used for commercial farming purposes or (c) available for, but not currently being used for agricultural production purposes. (c) may be used to identify publicly owned, institutional, tribal, or utility land where the owner may be interested in allowing agricultural use under certain conditions. The mapping system for non-ARL designated agricultural lands will show all land under Current Use Agriculture property tax status, regardless of any land owners "'opt-in" status for that land.

Example Land use policy xx: Establish/adopt a "no-net-loss" policy for agricultural lands similar to the no-net-loss policies for certain critical areas. For lands meeting ARL designation criteria adopt mitigation criteria for lands lost/converted to non-agricultural uses, excepting agricultural accessory uses on land where the primary use of the land remains agricultural production.

Example land use policy XX: All lands meeting ARL designation criteria shall be the last lands considered for any of the following purposes: (a) Acquisition and change of primary use through public ownership, (b) inclusion within an Urban Growth area (UGA), (c) re-zoning for a density greater than one dwelling unit per 5 acres, or other commercial, industrial, LAMIRD or other use where adjoining land uses could be detrimental to agricultural use.

32-6
cont.

Section, Economic Development:

The existing goals and policies affecting agriculture/the food system are essentially o.k. However, they are not very measurable. Terms such as “support”, “foster” “encourage” “engage” and “when feasible” create such a wide degree of latitude that any action, regardless of how minor the action is, can be seen as “supporting”, “fostering”, etc. This makes it very difficult to hold the county accountable for any specific degree or depth towards these goals/policies. Additionally, those terms are the “buzz words” associated with economic development grant funding. The county could be seen as including the proposed “food system” goals/policies more as a means to make grant funding under the auspices of the “food system” available than any actual intent to have any meaningful end-user economic development impact. Essentially, the food system “industry” is inherently non-governmental, so the benefits accruing from the use of the “buzz words” in the Comprehensive Plan should not just be for local government funding towards these nebulous goals/policies.

32-7

One or more additional goals/policies should be quite specific.

Example: Economic Development policy XX: Assess whether publicly owned properties/facilities that may be currently underutilized could be made available for one or more facets of the food system loop, i.e., primary agricultural production, value added processing, warehousing/cold storage, distribution, marketing, food hub, waste reduction and composting.

Section, Housing and Human Services:

The same general comments towards measurability and “buzz words” apply to this section also. The wording of the goals and policies themselves is somewhat problematic in that while the goals may be desirable, it is impossible to tell from the goal statement who, exactly, is supposed to be taking the actions described in the housing and human services goals/policies. Is it Kitsap County government, by itself? There appears to be little recognition in most of the goal/policy statements that NGO agricultural/food system advocacy/operator entities exist.

32-8

One glaring example is Housing and Human Services policy 32. “Create Mechanisms for fresh local food to be affordable and accessible to all segments of our community”

How exactly does Kitsap County, as a matter of policy, propose to ensure affordability of local food, or that it will be accessible to all segments of the community. This text of this particular policy appears tailor-made primarily to act as a placeholder within the Comprehensive Plan for the county to use to seek federal funds for food subsidy programs. Local food affordability and accessibility are primarily a function of the local agricultural/food system industry, and how well it is doing. If the local industry is doing well, local food will be both affordable and accessible. Otherwise, affordability and accessibility relate to those eligible for food subsidies, and food retailers stocking those things on the “approved to buy” lists. It begs the question, are we “creating mechanisms” to make the production, processing, value adding, distribution, marketing, etc. affordable? Or, not worrying about those things, simply making sure the county is in line for sufficient federal food subsidy dollars. This can’t be determined looking at the language of Housing and Human Services policy 32.

32-8
cont.

Comment regarding Title 17 Zoning Code definitions/purposes statements for Rural Residential and Rural Preservation Lands.

For each of the zones identified in the Kitsap County Comprehensive Plan, Comprehensive Land Use map (zoning map), and most particularly within in Title 17 there are zones identified.

Within title 17 the zones are identified by name of the zone, followed by a statement describing the “purposes”, or expected uses of each zone.

The existing “purpose statements” for the Rural Residential (RR) and Rural Protection (RP) zones address only the residential use of these lands, with the difference between these two zones primarily being the level of development constraints related to environmental features.

32-9

Nowhere in the purpose statement is their mention of the zones being used for natural resource purposes, i.e., agriculture, small scale timber operations, or any other natural resource based economic purposes. Thus, under the existing “purpose statements” residential use is the primary de-facto use, and other uses, not mentioned, may be allowed in the “use table” but only to the extent they do not interfere with the “quiet enjoyment of residential use.”

So long as there is a lack of formally designated land for agriculture/agriculture accessory uses to occur (designated ARL) , and the vast majority of the land base within the county falls into either the RR or RP zones, the existing RR and RP purpose statements are inappropriate given the past, current and expected future land uses in these two zones to include natural resource based uses.

It is suggested the RR and RP purpose statements be modified to read as follows:

Proposed language for Rural Residential zone

Rural Residential (RR) Zone: This zone is intended to encourage the preservation of resource based land uses, and conservation of the natural resources while also allowing low density residential development consistent with rural character. For residential development purposes this zone is applied to those areas that are relatively unconstrained by environmental features such as visual, historical, natural features, wildlife corridors, steep slopes, wetlands, streams and adjacent critical areas. These areas are provided with limited public services. Residents of Rural Residential Tract shall recognize that they can be subject to normal and accepted farming practices, accessory agricultural land uses, and limited forestry practices on adjacent parcels.

Proposed language for Rural Protection zone

Rural Protection Zone: This zone is intended to encourage the preservation of resource based land uses and conservation of the natural resources while also allowing for low density residential development consistent with rural character. For residential development purposes this zone is applied to areas with significant environmental features such as visual, historical, natural features, wildlife corridors, steep slopes, wetlands, streams, and adjacent critical areas. These areas are provided with limited public services. Residents of Rural Preservation Tracts shall recognize they can be subject to normal and accepted farming practices, accessory agricultural land uses, and limited forestry practices on adjacent parcels.

Advantages for adopting proposed changes to RR and RP zone “purpose statements” concurrently with the Comprehensive Plan update:

- While Title 17 is not directly up for review/amendment at this time, Title 17 is the primary Land Use regulation implementing land use/zoning under the umbrella of the county’s Comprehensive Plan. The changes suggested would only apply to the zoning purpose statements for RR and RP zoned land.
- The suggested changes to the purpose statements for RR and RP zoned land do not require any re-zoning of any lands currently under RR or RP zoning. The changes only clarify the “intent” regarding land uses within the existing zones.
- The proposed changes would not equate to a “downzone” with respect to any current or future development rights. All vested rights would remain intact.
- The suggested changes support a “Right to Farm” without necessarily requiring a separate “Right to Farm” ordinance, and create a “notification” to adjacent landowners. One very specific benefit is that it would not be necessary for farming activities to precede adjacent residential development in order to engage in normal and accepted

32-9
cont.

farming practices. The suggested changes include language letting adjacent land owners know they may be subjected to normal and accepted farming practices on adjacent parcels with the same zoning. If there is a question regarding “allowed use”, the county can show the “purpose statement” as evidence that normal and accepted farming practices and accessory agricultural uses are allowed in those zones.

- The suggested changes create a means for landowners to choose from among primary land uses in these zones. If a landowner chooses to use land in these zones primarily for residential use, that is allowed. If a landowner chooses to use land in these zones either primarily or even exclusively for natural resource based uses, including for agriculture, that is also allowed. This makes residential and natural resource based uses in these zones co-equal, rather than various natural resource based uses merely being found only in the use table under residential zoning.

32-9
cont.

Comment regarding Kitsap County Strategic Agricultural Plan and Inventory (SAPI) and Food Production: Rural Agriculture, Central Puget Sound Food Assessment, Regional Food Policy Council & University of Washington, June 2011.

Kitsap County Has made use of these two, and other documents to show a change in direction towards how the county views its agriculture resources, including attempting to classify/designate appropriate Agricultural Resource Lands (ARL). The recognition through these documents by Kitsap County that some more formal means of recognition/designation of ARL is necessary is evidenced within the documents themselves. What is still missing is recognition through the Kitsap County Comprehensive Plan, and accompanying mapping associated with land use/zoning of any land with agriculture zoning, or any “Agricultural Emphasis Areas” (AEA’s), any Agricultural Districts, any agricultural land use overlays, or the like. Nor is there any textual criteria found in the Comprehensive Plan necessary in determining which, if any lands in the county should be considered as lands considered for preservation and expansion as lands suitable for agricultural production.

32-10

Effectively, the county is telling its residents and other jurisdictions that changes are in order and underway, yet these changes are not formalized in a way to hold the county accountable for adopting/implementing the changes. Goal statements and policy statements must in some way be measurable. We cannot use the mere existence of documents such as the ASPI as evidence of working to make necessary changes toward achieving goals. Supporting land use policies need to be outcome based and specific. The average person should be able to compare the policy statement to the actual condition, and make an informed judgement regarding if the policy is being met.

Jerry Harless
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Jlharless@wavecable.com
December 7, 2015

David Greetham, Planning Supervisor
Kitsap County Department of Community Development MS-36
614 Division Street
Port Orchard, WA 98366

RE: November 2015 Draft Comprehensive Plan, Capital Facilities Plan and Supplemental EIS

David,

I am writing to you today to comment on the draft Comprehensive Plan, draft Capital Facilities Plan and draft Supplemental Environmental Impact Statement (DSEIS) released in November, 2015. Because the three were released simultaneously, please consider all my comments to be directed not only to the individual documents, but also as EIS comments for which an agency response in the FSEIS is appropriate.

The process is somewhat unusual in that your department has issued draft plan/CFP/SEIS documents with a fixed public comment window that closes before any public hearings take place. If I read the County's Public Participation Plan and DCD's PowerPoint presentation from the November 23, 2015 joint Board and Planning Commission work study session correctly, there will be further opportunities to comment on and testify about the draft plan once it lands on the Planning Commission's and Board of County Commissioners' public hearing agendas. However, this appears to be the only comment period for the DSEIS.

33-1

Because the County has not released draft development regulations (Zoning, Critical Areas and Subdivision codes) which are necessary to implement the plan, my comments will necessarily be directed to an incomplete suite of documents. Also, because the DSEIS lacks a preferred alternative, citizens are left to comment on the full range of alternatives with no clear idea which the professional staff believes will best accommodate growth and comply with the GMA.

Accordingly, my comments today are preliminary and somewhat limited as I do not have the full picture before me.

Draft Comprehensive Plan (Update)

The draft Comprehensive Plan, the next RCW 36.70A.130(3) periodic update, appears to be a complete rewrite of the plan. Early in the update process, then Director Larry Keeton stated the intention to excise from the plan policies that were outdated, had been accomplished, were no longer

33-2

relevant and particularly those that were aspirational but not practical in their application. Thus a much slimmer plan document is no surprise.

But without the draft development regulations to show how or even if the plan policies will be implemented, the plan consists almost entirely of vague and aspirational policy statements – good intentions but little in the way of a practical mechanism for achieving those policy aims. Some of these policies direct action within the zoning code, etc. but without a draft of that code, the policy statements are no more concrete than those of the current plan.

33-2
Cont.

The Growth Management Act does not specifically require that plan and development regulation amendments be considered and adopted concurrently, but the Hearings Boards have pointed out in several cases that not doing so can introduce inconsistencies between the plan and development regulations – a situation that the GMA prohibits. Thus if a plan amendment renders the zoning code, CAO, etc. inconsistent with the plan, the County must amend these codes concurrently with the plan amendment.

Presumably, when the draft plan update reaches the Planning Commission for public hearings, draft development regulations will accompany it and citizens will be better able to understand and comment upon the proposed planning scheme. So at this point, my comments will be limited to one or two particular issues of specific concern to me and I reserve the right to expand upon them when a complete draft is available.

Urban Growth Areas and Urban Land Capacity

The DSEIS erroneously states that the urban land capacity of the existing urban growth areas is insufficient to accommodate planned growth. The land capacity analysis detailed in the Buildable Lands Report finds not only sufficient residential capacity but a surplus. This should be no surprise as the numerical growth targets are unchanged from those in effect when the 2006 plan was adopted. The end date for those targets was moved out in time from 2025 to 2036 to reflect a slower-than-anticipated rate of growth. But the inconsistent land capacity findings of the Buildable Lands Report, DSEIS and Draft Plan represent a fatal flaw which could result in erroneous land use decisions with regard to UGA sizing.

33-3

Because there is no shortage of urban land capacity, there is no reason or justification for a net expansion of urban growth areas. It may be appropriate and desirable to adjust UGA boundaries to “swap” urban-designated lands that are less suitable for urban growth in the coming decade for rural lands that are more suitable, but the net result should not be additional capacity.

33-4

Expansion of UGAs to accommodate an unchanged growth target is specifically prohibited, in Kitsap County’s case because the County is struggling to correct inconsistencies between actual vs planned growth patterns with reasonable measure which, so far, have proven ineffective. See RCW 36.70A.215(1)(b).

33-5

RCW 36.70A.215 – Buildable Lands and Reasonable Measures

As you know, I have challenged the GMA compliance of Kitsap County's 2014 Buildable Lands Report to the Growth Management Hearings Board.¹ The briefing is complete and the hearing on the merits is scheduled for tomorrow. While we do not yet know how the Board will decide this case, some of the issues raised have a direct bearing on the 2016 update to the plan and development regulations regardless of the legal outcome.

33-6

One of the issues on appeal is whether or not Kitsap County complied with the requirement of RCW 36.70A.215(4) to annually monitor reasonable measures for effect and to take corrective action should they prove ineffective. The existing plan addresses this requirement in policy LU-11:

LU- 11 Monitor the effectiveness of adopted reasonable measures in 5-year intervals with the publication of the BLR

Note that while the GMA requires annual monitoring of reasonable measures, Policy LU-11 only commits to monitoring in five-year intervals. Clearly this policy could be improved. But the draft Comprehensive Plan actually drifts further from the statutory requirement:

Land Use Policy 9: Continue to review and assess data for application of reasonable measures.

33-7

Setting aside for a moment my contention on appeal that annual monitoring has not been done and thus there is nothing to "continue", this extremely vague policy does not commit to any sort of schedule, process or even purpose for monitoring reasonable measures.

The GMA requires annual monitoring of reasonable measures "for effect" and corrective action should they prove ineffective.² In the current appeal, the County is inconvenienced by a lack of anything in the record to indicate that annual monitoring took place at all, much less triggering any kind of policy decision about corrective actions.

A prudent policy would be to establish an annual monitoring procedure that results in a determination as to whether or not the reasonable measures have been effective in reducing the inconsistencies demonstrated by the most recent Buildable Lands Report. That finding should then be documented and submitted to the annual plan amendment docketing process.³ A need for corrective action would then be documented, supported by data and part of an established amendment process. A finding that reasonable measures are having the desired effect, and outcome we all hope for, should also be submitted to the docketing process so the County has a documented basis for taking no corrective action.

The other draft reasonable measures policy is even more perplexing:

¹ CPSGMHB Case No. 15-3-0005 *Harless IV*

² See CPSGMHB Case No. 04-3-0031c 1000 *Friends* Final Decision and Order at 24 where the Board explained this requirement.

³ Some reasonable measures adjustments may require revision to development regulations but not require a plan amendment. Such a finding could also be included in the plan amendment docketing process, but the necessary amendment to development regulations could be handled separately.

Land Use Policy 10: Measure, adopt and implement reasonable measures if the Buildable Lands Report finds inconsistencies in planned growth.

The wording of this policy could be made less ambiguous and better reflect the statute by replacing the phrase “inconsistencies in planned growth” with “inconsistencies between actual and planned growth patterns”. But more important is the entirely inappropriate conditional “if” statement. In the current appeal of the BLR, I have alleged and the County’s legal counsel has stipulated that the data in the BLR demonstrate inconsistencies between planned and actual growth. We disagree about the adequacy of the BLR’s text in explaining those data, but it is an undisputed fact that the BLR has demonstrated inconsistencies. The “if” should be replaced with “that”.

33-8

The Legislature recently amended the GMA to finally coordinate the schedules of the several plan review and update requirements. Now Buildable Lands Reports and Comprehensive Plans updates must be updated every eight years, with the BLR due one year prior to the plan update. So for this time around as well as for every future plan update, it is known whether or not the Buildable Lands Report has demonstrated inconsistencies in planned vs actual growth when the plan update draft is prepared. Thus the non-committal and conditional language of Land Use Policy 10 is inappropriate and misleading.

Draft Supplemental Environmental Impact Statement

The DSEIS appears to be a well-organized and clear document so far as it goes. But the cart seems to have been put before the horse as the development regulations necessary to implement the various plan alternatives have not been completed or released and thus the document cannot evaluate their likely impacts. After all, an EIS is not a time machine.

There are also errors in the document with regard to land capacity and the analysis of reasonable measures, which still fails to meet the requirements of RCW 36.70A.215

Development Regulations – Is further SEPA Analysis Forthcoming?

It is my understanding that draft development regulations were not released concurrently with the draft plan and SEIS because they were not yet completed and that they will be released after the current public comment period on the DSEIS has closed. Without those drafts before me, I cannot formulate an informed opinion as to whether the DSEIS adequately addresses the likely impacts of those regulations or of the combined regulatory scheme of the plan and development regulations taken together. Assuming that the omission is due to the fact that the DSEIS was prepared before the development regulations, it is a temporal impossibility for the DSEIS to address the impacts of those yet-to-be-drafted regulations.

33-9

I do not know if the staff intends to create draft development regulations for all three alternatives, or wait for the appearance of a preferred alternative. Either way, the full impacts of the proposed regulatory scheme cannot be assessed when only the aspirational “what” and not the “how” of the plan is available.

Urban Land Capacity – Inconsistent Data

While the GMA oddly enough does not require it, Kitsap County has prudently always used an identical land capacity analysis methodology for both its forward-looking UGA sizing analysis (RCW 36.70A.110) and its backward-looking Buildable Lands Analysis (RCW 36.70A.215). Thus the performance and remaining capacity of previously-designated UGAs is evaluated using precisely the same methodology by which those UGAs were sized to begin with.

The Land Use Chapter of the draft Comprehensive Plan states that the urban land capacity analysis used to evaluate existing (“No Action”) UGAs as well as the potentially revised UGAs in the other two alternatives is that used in the Buildable Lands Report which was issued on June 30, 2015.⁴

Thus one would expect that the Buildable Lands Report and the DSEIS would agree perfectly as to the available net urban land supply for the No Action Alternative. But they do not. The Buildable Lands Report finds more than sufficient urban land supply:

Cities and UGA have a combined buildable land capacity sufficient to accommodate approximately 86,237 persons. The planned incorporated city and UGA share of the forecast population growth is 63,800 persons for both 2025 and 2036.⁵

The DSEIS on the other hand, contradicts this statement:

With the exception of Alternative 1, which does not provide sufficient land capacity for projected urban growth, the alternatives are generally consistent with adopted plans and policies, though some alternatives are more aligned with the goals of particular plans and laws than others.⁶

The details are scattered through numerous tables in both the Buildable Lands Report and the DSEIS, but looking at the data for UGA capacity, it is clear that the two do not agree at the UGA or the aggregate (county-wide) level. Exhibit 2.6-22 of the DSEIS lists population capacity figures for the existing unincorporated UGAs (i.e. Alternative 1 – No Action). Those figures differ significantly from the UGA capacity figures found in Appendix B of the Buildable Lands Report.

So the Buildable Lands Report finds urban land capacity for 35% more population (22,437) than projected, but the DSEIS, using precisely the same land capacity analysis, tabulates different figures to find that the No Action alternative does not have sufficient urban land capacity. Both cannot be true and the inconsistency between them presents a fatal flaw in sizing UGAs for the updated plan.

This glaring error must be corrected before the three alternatives can be meaningfully evaluated by the public, the Planning Commission or the County Commissioners.

Reasonable Measures – Selective Public Participation

The first thing I noticed when reading the reasonable measures discussion in the DSEIS was that a group of “stakeholders” had been assembled and interviewed to evaluate the existing and potential

⁴ Draft Comprehensive Plan Update at 9

⁵ 2014 Final Buildable Lands Report, Executive Summary at 3.

⁶ DSEIS at 1-14.

reasonable measures. What struck me about this group was that it was composed entirely of County employees and members of the real estate and development industries – two groups with a vested interest in the status quo. I suppose that my current litigation may have been reason to exclude the one person in Kitsap County with the most knowledge and direct experience with Buildable Lands issues, not to mention providing some diversity in viewpoint, but isn't that kind of petty? What you have is the illusion of a balanced sounding board for new ideas which is really just an echo chamber for the party line.

33-11
Cont.

During the last plan update, citizen advisory groups were composed of people with very divergent points of view. The result, while perhaps less tidy, was a more complete understanding of the various issues and some movement toward compromise solutions rather than zero-sum outcomes.

Reasonable Measures – Nothing found to be “reasonably likely” to increase consistency

One area of contention in the current appeal of the County's 2014 Buildable Lands Report is that the report does not “identify measures reasonably likely to increase consistency during the subsequent five year period” as required by RCW 36.70A.215(4). The County's argument is that this identification of reasonable measures is more appropriate as part of the plan update and associated SEPA process.

33-12

Regardless of which side prevails in that argument, the DSEIS contains numerous errors and omissions with regard to the findings of the Buildable Lands Report and does not identify any measures deemed “reasonably likely” to reverse the inconsistent growth patterns demonstrated in all three of Kitsap County's Buildable Lands Reports.

The discussion of reasonable measures on pages 79-80 of the main body of the DSEIS more or less accurately describes the County's Buildable Lands/reasonable measures history up to 2006, but fails entirely to mention that the inconsistencies identified in 2004 have persisted through the period evaluated in the 2014 Buildable Lands Report. How can an EIS adequately evaluate the need for and prospective impact of reasonable measures if it does not acknowledge that those inconsistencies have persisted despite the measures enacted in 2006? It does not as can be seen from the meager list of measures identified in the DSEIS appendix

Discussion on pages 3-92 erroneously states that “Several of the [existing] measures have been effective in redirecting growth, such as increasing allowable densities in UGAs, and particularly minimum densities.” One could imply from this erroneous statement that the No Action alternative with only its list of existing reasonable measures will be sufficient to achieve consistency between planned and actual growth. But the Buildable Lands Report tells a much different story.

33-13

The Buildable Lands Report documents that rural housing is averaging two, four and eight times the maximum allowed, the urban share target has still not been met – has never even come within 10% of the target, and the actual density of housing in the 5-9 du/acre urban zones has averaged around 3 to 3 ½ du/acre.

33-14

The reasonable measures discussion of Alternatives 2 and 3 refer to additional reasonable measures to be found in Appendix G of the DSEIS. But the DSEIS analysis of those measures is rather dismal.

33-15

The GMA requirement for reasonable measures is to identify (in the Buildable Lands Report), adopt and implement measures that are “reasonably likely” to increase consistency over the subsequent five years. The areas of inconsistency are too-high rural density, too-low urban density and less growth locating in UGAs than planned (urban share).

33-16

The courts have directed counties to base their planning decisions on “local circumstances”, rebuking both the Hearings Boards and local governments for past reliance on one-size-fits-all “bright line rules”. All three of the County’s Buildable Lands Reports have identified a single local circumstance which is causing growth patterns inconsistent with the Plan and CPPs: the large supply of pre-GMA non-conforming lots of record, aka “legacy lots”.

To date the County has never identified, much less adopted or implemented measures to counteract the impact of those legacy lots on the pattern of growth. Rather, the County has first pointed to a list of density-targeted measures in effect when the inconsistencies occurred (a response rejected by the courts) and then adopted additional but similarly tangential measures. The result, again, is that these measures have failed and once again additional measures are required.

The experience of twenty years of GMA planning, the language of the GMA and its interpretation by the courts have made the logic inescapable: in order to be “reasonably likely” to be effective against these persistent inconsistencies, policy measures must address the local circumstance that is the root cause – the legacy lots. Kitsap has tried relying on existing but ineffective policies and throwing a long list of minor measures at the problem to no avail. Only by tackling on the legacy lot issue head on will the County’s plan be “reasonably likely” to achieve the pattern of growth indicated in the plan and the urban concentration and anti-sprawl goals of the GMA. Everything else is just noise.

33-17

Appendix G of the DSEIS identifies exactly three measures that deal with legacy lots, but finds none of them to be reasonably likely to be effective. More imagination, effort and better analysis are clearly in order if the County is not to simply (continue to) surrender to sprawl as an inevitable force of nature.

Appendix G at page 70 discusses the potential of requiring a maximum lot size, compelling a minimum density, for housing constructed in UGAs but makes the rather tepid observation that this would “ensure a more efficient use of land area” and “may be appropriate”. As to the statutory test of whether this measure would be “reasonably likely” to increase consistency with the County’s urban density and urban share targets, the DSEIS is silent.

33-18

The fact that the County currently does not implement its comprehensive plan and zoning density requirements through the building permit review process is a causal factor in the low density of constructed housing in UGAs. Requiring new housing construction, including individual homes, to comply with the minimum density requirements of the plan and zoning code by a measure such as a maximum lot size requirement is not only reasonably likely, but nearly certain to result in higher urban density. The County staff among the “stakeholder” interviewed on this subject should have been able to provide that analysis even if the development interests prefer the status quo.

The second legacy lot measure the DSEIS identifies is rural lot aggregation (pages 71-72). The DSIES notes that “the minimum lot size of the rural or resource zone could be met and create a more consistent rural character” through this measure but then dismisses its likely effectiveness by opining that it could easily be thwarted by landowners.

33-19

Again, the DSEIS authors lack imagination and/or experience. Lot aggregation is nothing new to Kitsap County. The zoning codes in the late 1970s and early 1980s included lot aggregation requirements for undersized rural and even some urban lots. The principal driver then was compliance with health regulations for on-site septic systems. Undersized parcels did not need to be in common ownership, if a landowner could not aggregate sufficient lots to satisfy the minimum lot size requirements of the health code, a building permit would not be issued. The same policy is possible, albeit likely controversial, with regard to rural lot aggregation to implement the plan and conform to the anti-sprawl goal of the GMA.

33-19
Cont.

But even with a measure that limited lot aggregation to adjacent lands in common ownership, circumvention could be prevented by tying the requirement to ownership as of the date the regulation becomes effective. Thus arm's length or post-adoption ownership changes would not be effective in thwarting the requirement. This worked 35 years ago and can work again.

The only other measure that addresses legacy lots is discussed on pages 72 and 73. Reconfiguration of rural lots into clusters of smaller lots with the remainder of land consolidated for "conservation uses" may serve some purpose but it will certainly not reduce rural densities or increase the share of growth that locates in urban areas. Rather, it creates smaller urban-sized lots which would be more likely to demand urban services and be even more attractive to growth, thus defeating the urban share target.

33-20

The DSEIS falls far short of the statutory duty to identify measures reasonably likely to counter the effect of the local circumstances causing persistent inconsistencies between actual and planned growth patterns and erroneously dismisses the likely effectiveness of the two obvious measure to increase urban density and decrease low density sprawl in rural areas.

33-21

Draft Capital Facilities Plan

The draft Capital Facilities Plan builds upon prior quality work to produce a well-written document. As you likely recall, the capital facilities topic of greatest interest to me is sanitary sewers as those are the make-or-break service for urban growth.

Appendix B contains a good discussion of the duties and challenges of providing "adequate and available" sanitary sewer services to UGAs that are at the end of the original planning period, when capital improvements necessary to fully serve those UGAs must be in place or fully funded within the six year capital plan.

33-22

It is difficult for the average reader to determine from the extensive detail and sometimes technical language of the plan whether this requirement has been met with regard to the original 1998 UGAs. What I can glean from the document is that a) the County is aware of the obligation, b) the County expects much of the existing housing within the UGAs to continue to rely on individual on-site septic systems because the life expectancy of those systems exceeds the planning period, c) there appear to be future funding shortfalls on the horizon (6-year or 20-year is not readily apparent to me) and thus d) the County will need to either adjust levels of service or reexamine the Land Use Element (i.e. possibly contract UGAs).

In other words, the draft capital facilities plan appears to be complete, but it may well document a duty to amend the Land Use Element of the plan to achieve compliance with the capital facilities requirements of the GMA.

33-22
Cont.

Respectfully,



Jerry Harless

Cc: Katrina Knutson, DCD staff
Kitsap County Planning Commission
Kitsap County Board of Commissioners

Steven M. Harris
406 Riverview Drive NE
Auburn, WA 98002

RECEIVED
DEC 02 2015
KITSAP COUNTY DEPT OF
COMMUNITY DEVELOPMENT

November 29, 2015

RE: Elverd Lee Harris Credit Shelter Trust
Permit Number 15 00724

To whom it may concern:

I would like to comment on the pending comprehensive plan, and specifically to the Central Kitsap plan and permit number 15 00724. I support this site to be zoned Urban Low Residential (UL). The site, consisting of 15 acres, was zoned Urban Low on 5 acres, and the remaining portion of this property, 10 acres, was zoned and used as industrial since 1959. In the 2006 comprehensive plan, all of the property was zoned to Urban Low. This was not only consistent with surrounding uses, but was also consistent with a rezone request by the Harris Family to have the 10 acres of industrial property zoned to Urban Low.

34-1

In the 2012 remand of the Central Kitsap UGA, the property was taken out of the Urban Low zoning designation and changed to Rural Residential, which was a substantial downsizing of the previous zoning and inconsistent with the surrounding area. This property has urban amenities, including water and sewer at the southern boundary, and borders an elementary school. The sewer and water was brought to the boundary of the property through negotiations with the county and a developer based on the zoning and the ability to hook up to those services when the property was developed (see hearing examiner's minutes dated 18 February 2004). There is a file on this property (11/03) about when we worked with Rick McNicholas for the rezone of the 10 acres to UL. Now the property is restricted from those services as Rural Residential.

34-2

I feel that this property should be included in the UL zone. This is the only large parcel(s) of property not developed in the area and Winters Road to the north makes a natural buffer and boundary line for the Urban Growth Area boundary. This property has, and does, provide the opportunity for affordable housing.

34-3

This letter is to confirm my support of alternative 3, bringing the subject property into the Urban Growth area to accommodate the need for residential lots in this area and of the size allowed in the Urban Low zone.

34-4

Sincerely,


Steven M. Harris

nwcrei@nventure.com
(253) 333-1634

RECEIVED

DEC 02 2015

KITSAP COUNTY DEPT OF
COMMUNITY DEVELOPMENT

Gary L. Harris
7000 Wing Point Road NE
Bainbridge Island, WA 98110-2987

November 30, 2015

Re: Elverd Lee Harris Credit Shelter Trust
Permit Number 15-00724

To whom it may concern:

I would like to comment on the pending comprehensive plan, especially the Central Kitsap plan and permit number 15-000724. I urge approval of this permit application to be zoned Urban Low Residential.

35-1

This site is 15 acres. Formerly, it was zoned Urban Low on 5 acres and Industrial on 10 acres since 1959. In 2006 the entire 15 acres was zoned Urban Low (UL). However, during the 2012 remand of the Central Kitsap UGA the entire property was downzoned to Rural Residential, resulting in an inconsistency with adjacent Urban Low properties. The site is bordered with Urban Low properties at the west, east and south boundaries. The Esquire Hills Elementary School borders the south boundary and Winters Road borders the north. This property has urban amenities, including water and sewer installed at the south boundary, ready for hook up when the property is developed (see hearing examiners minutes dated 18 February 2004).

35-2

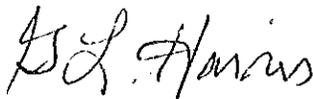
I believe this property should be included in the UL zone. This is the only large undeveloped parcel of property in its area. Winters Road to the north makes a natural and logical buffer and boundary line for the Urban Growth Area. This property provides the opportunity of affordable housing. Additionally, it offers a unique element of safety for future families with young children walking to and from Esquire Hills Elementary School and its adjacent playground.

35-3

This letter confirms my support of alternative 3, bringing the subject property into the Urban Growth area to accommodate the growing need for residential lots in this area.

35-4

Sincerely,



Gary L. Harris
glhview@gmail.com
206-842-2214

Yula May Harris
2131 East 21st Street
Bremerton, WA 98310

December 3, 2015

Re: Elverd Lee Harris Credit Shelter Trust
Permit Number 15-00724

To whom it may concern:

I would like to comment on the pending comprehensive plan, especially the Central Kitsap plan and permit number 15-000724. I urge approval of this permit application to be zoned Urban Low Residential.

36-1

This site is 15 acres. Formerly, it was zoned Urban Low on 5 acres and Industrial on 10 acres since 1959. In 2006 the entire 15 acres was zoned Urban Low (UL). However, during the 2012 remand of the Central Kitsap UGA the entire property was downzoned to Rural Residential, resulting in an inconsistency with adjacent Urban Low properties. The site is bordered with Urban Low properties at the west, east and south boundaries. The Esquire Hills Elementary School borders the south boundary and Winters Road borders the north. This property has urban amenities, including water and sewer installed at the south boundary, ready for hook up when the property is developed (see hearing examiners minutes dated 18 February 2004).

36-2

I believe this property should be included in the UL zone. This is the only large undeveloped parcel of property in its area. Winters Road to the north makes a natural and logical buffer and boundary line for the Urban Growth Area. This property provides the opportunity of affordable housing. Additionally, it offers a unique element of safety for future families with young children walking to and from Esquire Hills Elementary School and its adjacent playground.

36-3

This letter confirms my support of alternative 3, bringing the subject property into the Urban Growth area to accommodate the growing need for residential lots in this area.

36-4

Sincerely,

Yula May Harris
yumah19@gmail.com
360-377-1396

Jim & Cathy Hayes
PO Box 2886
Silverdale, WA 98383
November 10, 2015

TO: Kitsap County Department of Community Development,
Dave Greetham, Katrina Knutson and Whom Concerned

RE: New Comprehensive Plan and Rezone or UGA expansion (Tax parcel number:
182501-4-042-2008)

(Address: 4803 Anderson Hill Road, Silverdale WA 98383)

Dear Dave, Katrina and Whom Concerned,

This letter is for request and comment regarding Kitsap County's new comprehensive plan update and a rezoning of our property located at 4803 Anderson Hill Rd. in Silverdale, (Tax Parcel Number 182501-4-042-2008). Unfortunately we became aware of the comp plan update in March and just missed the time window for site specific rezoning requests which ended in February. Our agent/Realtor has visited your office 3 times regarding possibilities of rezone and/or including of our property into the UGA under the new comp plan and we also contacted Katrina via email in July. During the past months we have been told of this upcoming (now current) time for public input regarding the new comp plan and that this is the appropriate time to request our zoning change. I believe that we also put in for a site specific amendment to the comp plan for this same property in 2004, but can't recall why a change was not accomplished then.

Our property certainly appears to qualify for a higher density zoning to bring it to highest and best use. It is not a huge parcel, (just shy of 2 acres at 83,635 sq. ft.), but is surrounded by much smaller parcels with a high density housing development adjacent to the northeast. Public utilities are available to this parcel, the dwelling on the property is hooked up to sewer and a sewer line runs through the property. (We know that sewer/utility availability has been a challenge for some properties within the current UGA eliminating them from cost effective development, which is not the case with our parcel here) Location is desirable near Silverdale and seems appropriate for single family residences or maybe even attached dwellings with some open space.

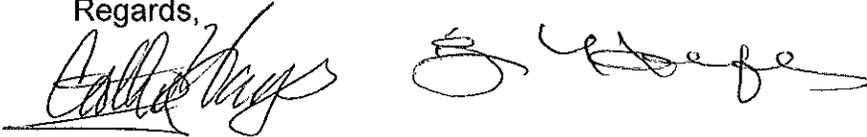
37-1

From our estimates, 7 to 10 dwellings could be easily created here, (not a huge development but something to contribute to easing our county's current housing shortage).

We will be attending the public meetings during this input time for the new/revised comp plan and look forward to reviewing your alternative proposed plans and our options.

Thank you and please feel free to contact us with any questions or comments regarding this matter.

Regards,

Handwritten signatures of Cathy and Jim Hayes. The signature on the left is for Cathy and the one on the right is for Jim.

Cathy and Jim Hayes

(phone 360-830-9039 or cell 360-731-2729)

(email hayesbcj@yahoo.com)

37-1
cont.

Kitsap Livable Environment Action
Network (KLEAN)

November 12, 2015

Kitsap County

Dear Planners:

A number of recent events strongly indicate the need to change the current zoning for the Port Gamble Mill Site on Port Gamble Bay from Rural Historic Town Waterfront to Rural Protection. Olympic Property Group (OPG) has proposed using this site for commercial and industrial purposes, such as the construction of a hotel, restaurants, and condominiums, with accompanying parking lots and roadways. This development goes against a number goals and findings. One of these goals is stated in Land Use Policy 48 in the Draft Comprehensive Plan for Kitsap County. The goal states: "Unlimited expansion of commercial and industrial uses in the rural areas is not appropriate. Accordingly, only limited new commercial and industrial uses will be permitted in the rural areas. Such commercial and industrial uses must be consistent with GMA and Comprehensive Plan."

Land Use Policy 48 is especially appropriate to the Port Gamble Mill Site because the site is in a FEMA designated flood plain and is located next to a Port Gamble Bay, a very ecologically important bay that has historically supported large populations of Pacific herring and salmon. Recent studies have shown that chemical contaminants in surface water runoff from roadways and parking lots are harmful to various life history stages of both herring and salmon. It will be a major challenge to control surface water runoff from a developed Mill Site in the event of major flooding that is likely to occur because of climate change. Also, predicted sea level rises caused by climate change could also cause release of toxic chemicals into the Bay.

Another recent finding was outlined in the latest Puget Sound Partnership 2015 State of The Sound Report. The report states that "Chinook salmon and herring are among the species that have declined over the last two years, as has the overall water quality" in Puget Sound. The Partnership's Executive Director is quoted as saying that it will take "decades of persistent effort to stabilize the health of our salmon, orcas and other native populations." As part of this persistent effort, the Washington State Department of Environmental Quality in cooperation with OPG is currently spending millions of dollars to clean up the pollution associated with the Port Gamble Mill Site. We believe that Kitsap County should join this Sound-wide effort by removing the Rural Historic Town Waterfront zoning from the Mill Site and converting it to Rural Protection.

Sincerely,

Bruce McCain, PhD, Bert Jackson, Marilyn Bode, Mary Gleysteen, Margaret Tufft, Craig Jacobbrown, Alice McCain, and Mark Barabasz

40-1

DEC 7 2015
Comprehensive Plan Update
Planning and Environmental Programs Division
DCD, MS-36
614 Division Street
Port Orchard, 98366
compplan@co.kitsap.wa.us

Regarding: Site-Specific Amendments to the Kitsap County Comprehensive Plan Update:

1. Cornerstone Alliance Church/permit number 15 00607
2. Gonzalez/ permit number/permit number 15 00657

Two amendments were proposed to the 2016-2036 2016-2036 Kitsap County Comprehensive Plan Update that would rezone land near Keyport Junction from rural residential to rural industrial (Cornerstone Alliance Church/permit number 15 00607 and Gonzalez/permit number 1500657). Our neighborhood is rural residential, and these amendments to convert these properties to industrial use should not be approved.

The neighborhood surrounding Keyport Junction (Scandia, Pearson Point, Virginia Point, and west of Viking Way/Silverdale Way) is a quiet rural residential area. Nearby Scandia is farm-like and has a lovely church and old homes. Scandia Creek runs adjacent to the land that's proposed for industrialization. Though the roads from Highway 308 and Poulsbo/Silverdale are busy, especially during the go-to-and-from-work hours, the land that they're transiting through is not congested or commercial, and only recently has industrialization made ugly inroads into it. No more should be allowed.

There is now a gas station at Keyport Junction, and later some storage facilities were approved—and that, in my opinion, was a mistake. That mistake should not be compounded. In 2010 there was an attempt to develop Keyport Junction by designating it as a Limited Area of More Intense Rural Development, but after listening to the objections by many of the residents here, the County was good enough to reject that attempt. The attempt to industrialize/commercialize Keyport Junction has reared up again, and again it should be struck down. More industrialized land should not be snuck in under the noses of the residents here (most of whom don't know, yet, about these amendments) in the form of amendments to the Kitsap Comprehensive Plan 2016-2036 Update.

Our neighborhood does not need industrialization. We're already well served by heavily developed business/industrial areas that are just minutes away in all directions: Poulsbo, Silverdale, Bangor, Keyport, and Bangor. The driving time from Keyport Junction to the Silverdale business area is 4 minutes and 8 seconds, to the Poulsbo Viking Way business area is 3 minutes and 54 seconds, to the town of Keyport is 3 minutes and 37 seconds, and to the Bangor Submarine Base is 2 minutes and 14 seconds. We're minutes away from multiple major commercial centers. A more developed Keyport Junction is not needed.

Also, in contradiction to the claim on one of the applications, we do not need an industrialized Keyport Junction in order to supply needed jobs. Residents reside here because of its ruralism. Industrialization at Keyport Junction—with the consequent spread of the industrialization and commercialization and congestion that would then occur over the years—would eat away at that ruralism.

43-1
Cont.

What we do need, though, is the rural land around Keyport Junction to serve as a buffer between Silverdale and Poulsbo (near NW Finn Hill Road). These areas are developed intensely, which is appropriate since they are urban areas. Removing the buffer would lead to one continuous block of heavy commercialization/industrialization from Silverdale to Poulsbo. Other towns and cities are infamous for such urban sprawl, and that's not a condition we want in Kitsap County.

43-2

Please reject these amendments to convert rural residential land into rural industrial land. They are not needed and they are not wanted by the surrounding residents. We want to maintain our rural/residential character.

Thank you,

Michael Maddox
(residence just south of the Keyport Naval Base)
RE

TO: Katrina Knutson

From: Mark Mauren, Chief Operating Officer Bremerton West Ridge

RE: Repose to Kitsap 2036 Staff report on Bremerton West Ridge Reclassification Request. Permit# 15-00522 Bremerton West Ridge

DATE: December 7, 2015

Thank you for the opportunity to respond to the County staff report for Bremerton West Ridge Reclassification Request (Permit# 15-00522 Bremerton West Ridge). I am pleased to provide additional information that should enable the staff report to better reflect our proposal and allow the County Planning Committee and Commissioners to base their decision on the best available information.

Overview

To better understand the proposal it might help if you know some of the history, current uses and future uses of the property as a whole (Bremerton West Ridge, LLC and Ueland Tree Farm, LLC).

- **Historically**, the 2,260+ acres (see Attachment 1) currently owned by Ueland Tree Farm and Bremerton West Ridge has been used as/for a:
 - Tree farm since statehood,
 - Aggregate extraction (Kitsap Quarry) since 1962,
 - Saw mill (Kitsap Quarry, Attachment 2),
 - Maintenance building, laydown yard and storage, vehicle and equipment (1960's - current),
 - Community water source (Kitsap Lake Water District (until 1994)
 - Non-motorized recreational uses.
- **Currently, the property is actively managed**
 - Timber production (FSC certified),
 - Aggregate extraction (over 20 million tons in permitted reserves over 5 sites),
 - Concrete and Asphalt recycling
 - Six rental homes (Lebers Lane),
 - Three commercial leases (Two buildings, storage for vehicles and equipment) located at Kitsap Quarry,

- Conservation easements (Chico and Dickerson creeks),
- Non-motorized recreational uses.
- Zoning
 - The majority of the 2,260 acres is zoned RW
 - 440 acres is located within the City of Bremerton and is zoned low residential,
 - 62 acres zoned URS (Kitsap Quarry)
 - 35 acres zoned City Watershed.
- **Future**
 - **Timber Management** - The majority of the property is managed under a FSC certified timber management plan. The plan provides approximately 1 million board feet of timber to local mills each year.
 - **Aggregate Extraction** - Aggregate reserves on UTF/BWR land will serve as one of the primary sources of aggregate in Kitsap County for the next 100 years. With that in mind this proposal is trying to:
 - Protect the existing aggregate sources and processing facility with an MRO designation.
 - Shift the primary flow of aggregate truck access to Werner Road and away from the Northlake Way residential area.
 - Shift aggregate-related facilities (Processing, concrete, soil, dumping, etc) away from residential areas (Northlake Way) and nearby forest land to Kitsap Quarry, which has been an industrial area for over 50 years and is directly adjacent to an existing major industrial complex (Werner road), inside the City of Bremerton city limits.
 - **Proposed RI designation** - With the proposed RI designation we plan to expand or develop the following uses that currently exist in Kitsap Quarry or are permitted under the UTF Mineral Resource CUP:
 - Aggregate processing and related office (Expand existing use),
 - Soil processing, including stump grinding (Develop, UTF Mineral Resource CUP) ,
 - Maintenance building, laydown yard and storage, vehicle and equipment (Expand existing use),
 - Concrete batch plant, (Develop, UTF Mineral Resource CUP),
 - Soil dump site (Expand existing use),
 - Concrete and Asphalt recycling (Expand existing use).
 - **Non-motorized recreation** - We hope to donate a trailhead and trail system to Kitsap County for non-motorized recreational use.
 - **Conservation** - We intend to continue to promote a conservation easement plan around critical wetland complexes and stream corridors

similar to the 100 acres we donated to the Mountaineers Foundation at the northern end of UTF/BWR holdings.

- **Development** – We intend to develop at least part of the 440 acres that is located within the Bremerton City Limits over the intermediate to long term.

We seek to be good stewards of the land by minimizing the impacts our management activities have on the public and environment. We feel we can accomplish this most effectively by concentrating a substantial part of the existing and permitted activities within the proposed RI area as well as property within the Bremerton City limits. For this to happen, it is important that the RI designation be added to the relevant parcels, as requested in our submission.

I also want to note that the County has already signed (Attachment 3) the SM6 form for the expansion of the mining operation into parcel 202401-3-002-2005.

Specific Comments on the Staff Report

1. Pg 1, 9 – 62 acres proposed RI and MRO and 80 acres RP with proposed MRO overlay. 44-1
2. Pg 6, 3 – **How the requested redesignation is in the public interest and the proposal is consistent with the Kitsap County Comp plan** – Kitsap Quarry is an established industrial use (50+ years) adjacent to other industrial uses and zoning that is within the City Bremerton. The industrial uses at Kitsap Quarry predate the Growth Management Act. The parcels in question may have been designated URS originally because the access was via Kitsap Lake Road (Residential). Now that truck traffic is entering/leaving via Werner Road (industrial road) instead of Kitsap Lake Road (residential) it makes more sense from a public interest standpoint and is more consistent with the intent of the Growth Management Act to designate these parcels RI with the long term industrial designation when these parcels are incorporated into the City of Bremerton. It is also important to note that the URS Designation states "*This zone may also apply to properties which are being considered for non-residential use.*" 44-2
3. Pg 7 – Response to the Statement that "*The proposed RI designation is not required to support existing mining operations*" – The URS designation with a MRO designation does not allow for expansion or development of all the current uses within Kitsap Quarry or permitted uses under the UTF Mineral Resource CUP: 44-3
 - Aggregate processing and related office (Expand existing use),
 - Soil processing, including stump grinding (Develop, UTF Mineral Resource CUP),

- Maintenance building, laydown yard and storage, vehicle and equipment (Expand existing use),
- Concrete batch plant (Develop, UTF Mineral Resource CUP),
- Soil dump site (Expand existing use),
- Concrete and Asphalt recycling (Expand existing use)

However, the RI designation allows for all these uses and fits with the type of industrial uses that occur in the adjacent industrial land.

3A.2.1 Rural Lands – Goal 2. Second bullet – Please note that The Ueland Tree farm Mineral Resource Conditional Use Permit also allows for a concrete batch plant, soil process facility, office, maintenance facility and equipment storage area. Because of that we disagree with the statement that “*RI zoning would not be consistent with the surrounding area*”. Kitsap Quarry is an established industrial use (50+ years) adjacent to other industrial uses and zoning that are within the City Bremerton. The industrial uses at Kitsap Quarry predate the Growth Management Act. The parcels in question may have been originally designated URS because the access was via Kitsap Lake Road (Residential). Now that truck traffic is entering/leaving via Werner Road (Industrial road) instead of Kitsap Lake Road (residential) it makes more sense from a public interest standpoint and is more consistent with the intent of the Growth Management Act to designate these parcels RI with the long term industrial designation when these parcels are incorporated into the City of Bremerton. It is also important to note that the URS Designation states “*This zone may also apply to properties which are being considered for non-residential use.*”

44-3
cont.

Importantly, future citizens of Kitsap County will benefit greatly from having e access to the aggregate processed at Kitsap Quarry. This is a 100+ year source of aggregate. This aggregate processing facility represents the bulk of the permitted aggregate in Kitsap County. These permitted aggregate resources ensure that future citizens of Kitsap County have aggregate resources available close to the population center of Kitsap County, reducing costs, truck traffic and environmental issues that would occur if a significant amount of aggregate continues to be imported into Kitsap County.

4. **3B.1b Goal 13: Policy RL-51:** – See attachment 4 for map of DNR Reclamation Permit showing permit boundary (yellow) encompassing the mentioned parcels. In addition parcels 202401-2-012-2005 and 202401-2-011-2006 provide important access to Kitsap Quarry and the proposed RI parcels.

44-4

5. **3B.1b Goal 13: Policy RL-53** - Response to the Statement that “ *The proposed RI designation is not required to support existing mining operations*” – The URS designation with a MRO designation does not allow for expansion or development of all the current uses within Kitsap Quarry or permitted uses under the UTF Mineral Resource CUP:

- Aggregate processing and related office (Expand existing use),
- Soil processing including stump grinding (Develop, UTF Mineral Resource CUP) ,
- Maintenance building, laydown yard and storage, vehicle and equipment (Expand existing use),
- Concrete batch plant, (Develop, UTF Mineral Resource CUP),
- Soil dump site (Expand existing use),
- Concrete and Asphalt recycling (Expand existing use).

44-5

However, the RI designation would allow for all these uses and fits with the type of industrial uses that occur in the adjacent industrial land.

6. **3B.1b Goal 13: Policy RL-56** – See Attachment 5, a memo prepared by a licensed Geologist that states there is commercially viable gravel on parcel 202401-3-002-2005. Also see Attachment 3, which is SM6 for parcel 202401-3-002-2005, signed by Kitsap County approving the expansion of the mining operation to parcel 202401-3-002-2005.

44-6

7. **3B.1b Goal 13: Policy RL-58** – See Attachment 5, a memo prepared by a licensed Geologist that states there is commercially viable gravel on parcel 202401-3-002-2005. Also see Attachment 3, which is SM6 for parcel 202401-3-002-2005 signed by Kitsap County approving the expansion of the mining operation to parcel 202401-3-002-2005.

44-7

8. **3B.1b Goal 13: Policy RL-59** – See Attachment 5, a memo prepared by a licensed Geologist that states there is commercially viable gravel on parcel 202401-3-002-2005. Also see Attachment 3, which is SM6 for parcel 202401-3-002-2005 signed by Kitsap County approving the expansion of the mining operation to parcel 202401-3-002-2005.

44-8

9. **3B.1b Goal 15: Policy RL-63** – See Attachment 5, a memo prepared by a licensed Geologist that states there is commercially viable gravel on parcel 202401-3-002-2005. Also see Attachment 3 which is SM6 for parcel 202401-3-002-2005 signed by Kitsap County approving the expansion of the mining operation to parcel 202401-3-002-2005.

44-9

10. **Pg 10 - 3B.1b Goal 15: c.** - Kitsap Quarry is an established industrial use (50+ years) adjacent to other industrial uses and zoning that is within the City Bremerton. The industrial uses at Kitsap Quarry predate the Growth Management Act. The parcels in question may have been designated URS originally because the access was via Kitsap Lake Road (Residential). Now that

44-10

truck traffic is entering/leaving via Werner Road (an existing industrial road) instead of Kitsap Lake Road (residential) it makes more sense from a public interest standpoint and is more consistent with the intent of the Growth Management Act to designate these parcels RI with the long term industrial designation when these parcels are incorporated into the City of Bremerton. It is also important to note that the URS Designation states "*This zone may also apply to properties which are being considered for non-residential use.*"

44-10
cont.

The comment "subject parcels have identified wetland" - It is important to note that the existing and proposed uses adhere to or exceed the regulatory requirement to protect wetlands. This was concern was addressed in the SEIS for the UTF CUP Modification that was recently approved by Kitsap County.

11. **GMA Planning Goals (5)** - Response to the Statement that "*The proposed RI designation is not required to support existing mining operations*" – The URS designation with a MRO designation does not allow for expansion or development of all the current uses within Kitsap Quarry or permitted uses under the UTF Mineral Resource CUP:

- Aggregate processing and related office (Expand existing use),
- Soil processing including stump grinding (Develop, UTF Mineral Resource CUP) ,
- Maintenance building, laydown yard and storage, vehicle and equipment (Expand existing use),
- Concrete batch plant, (Develop, UTF Mineral Resource CUP),
- Soil dump site (Expand existing use),
- Concrete and Asphalt recycling (Expand existing use).

44-11

However, the RI designation allows for all these uses and fits with the type of industrial uses that occur in the adjacent industrial land.

Response to the statement "*may lead to impacts to on site wetlands*" – This comment was addressed in the SEIS for the UTF CUP Modification that was recently approved by Kitsap County. Any proposed use will need to go through the SEPA process to determine their impacts and how/if they can be mitigated.

Response to statement "*That other significant mining operations*" - Kitsap Quarry is an established industrial use (50+ years) adjacent to other industrial uses and zoning that is within the City limits of Bremerton. The industrial uses at Kitsap Quarry predated the Growth Management Act. The parcels in question may have been designated URS originally because the access was via Kitsap Lake Road (Residential). Now that truck traffic is entering/leaving via Werner Road

(an existing industrial road) instead of Kitsap Lake Road (residential) it makes more sense from a public interest standpoint and is more consistent with the intent of the Growth Management Act to designate these parcels RI with the long term industrial designation when these parcels are incorporated into the City of Bremerton. It is also important to note that the URS Designation states "*This zone may also apply to properties which are being considered for non-residential use.*"

44-11
cont.

12. **GMA Planning Goals (8)** - The URS designation with a MRO designation does not allow for expansion or development of all the current uses within Kitsap Quarry or permitted uses under the UTF Mineral Resource CUP:

44-12

- Aggregate processing and related office (Expand existing use),
- Soil processing including stump grinding (Develop, UTF Mineral Resource CUP) ,
- Maintenance building, laydown yard and storage, vehicle and equipment (Expand existing use),
- Concrete batch plant (Develop, UTF Mineral Resource CUP),
- Soil dump site (Expand existing use),
- Concrete and Asphalt recycling (Expand existing use).

However, the RI designation allows for all these uses and fits with the type of industrial uses that occur in the adjacent industrial land.

13. **GMA Planning Goals D-1. B. Preserving rural character and enhancing the natural environment.** We respectfully disagree with the staff response that "the proposed RI designation may impact the character of the rural area". This site has been an active industrial area for over 50 year and will be for the next 100+ years. It is already part of the "Character" of this local area. As stated previously, Kitsap Quarry is an established industrial use (50+ years) adjacent to other industrial uses and zoning that is within the City Bremerton. The industrial uses at Kitsap Quarry predate the Growth Management Act. The parcels in question may have been designated URS originally because the access was via Kitsap Lake Road (Residential). Now that truck traffic is entering/leaving via Werner Road (an existing industrial road) instead of Kitsap Lake Road (residential) it makes more sense from a public interest standpoint and is more consistent with the intent of the Growth Management Act to designate these parcels RI with the long term industrial designation when these parcels are incorporated into the City of Bremerton. It is also important to note that the URS Designation states "*This zone may also apply to properties which are being considered for non-residential use.*"

44-13

14. GMA Planning Goals D-2. Rural land uses and development patterns – c. -
Response to the Statement that “ *The proposed RI designation is not required to support existing mining operations*” – The URS designation with a MRO designation does not allow for expansion or development of all the current uses within Kitsap Quarry or permitted uses under the UTF Mineral Resource CUP:

- Aggregate processing and related office (Expand existing use),
- Soil processing including stump grinding (Develop, UTF Mineral Resource CUP) ,
- Maintenance building, laydown yard and storage, vehicle and equipment (Expand existing use),
- Concrete batch plant (Develop, UTF Mineral Resource CUP),
- Soil dump site (Expand existing use),
- Concrete and Asphalt recycling (Expand existing use).

However, the RI designation allows for all these uses and fits with the type of industrial uses that occur in the adjacent industrial land.

15.3. Rural Commercial/Industrial and Type III LAMIRD Reclassification

Requests. a. - We disagree with the statement that “*RI zoning would not be consistent with the surrounding area*”. Kitsap Quarry is an established industrial use (50+ years) adjacent to other industrial uses and zoning that is within the City Bremerton. The industrial uses at Kitsap Quarry predate the Growth Management Act. The parcels in question may have been designated URS originally because the access was via Kitsap Lake Road (Residential). Now that truck traffic is entering/leaving via Werner Road (an existing industrial road) instead of Kitsap Lake Road (residential) it makes more sense from a public interest standpoint and is more consistent with the intent of the Growth Management Act to designate these parcels RI with the long term industrial designation when these parcels are incorporated into the City of Bremerton. It is also important to note that the URS Designation states “*This zone may also apply to properties which are being considered for non-residential use.*”

Importantly, future citizens of Kitsap County will benefit greatly from having access to the aggregate processed at Kitsap Quarry. This is a 100+ year source of aggregate. This aggregate processing facility represents the bulk of the permitted aggregate in Kitsap County. These permitted aggregate resources ensure that future citizens of Kitsap County have aggregate resources available close to the population center of Kitsap County, reducing costs, truck traffic and environmental issues that would occur if a significant amount of aggregate continues to be imported into Kitsap County.

44-14

44-15

16.3. Rural Commercial/Industrial and Type III LAMIRD Reclassification

Requests. c. – Response to comment that *“No unmet need has been identified”*. As I mentioned before, Kitsap Quarry is an established industrial use (50+ years) adjacent to other industrial uses and zoning that is within the City limits of Bremerton. The industrial uses at Kitsap Quarry predate the Growth Management Act. The parcels in question may have been designated URS originally because the access was via Kitsap Lake Road (Residential). Now that truck traffic is entering/leaving via out Werner Road (an existing industrial road) instead of Kitsap Lake Road (residential) it makes more sense from a public interest standpoint and is more consistent with the intent of the Growth Management Act to designate these parcels RI with the long term industrial designation when these parcels are incorporated into the City of Bremerton.

44-16

17.3. Rural Commercial/Industrial and Type III LAMIRD Reclassification

Requests. e. – Response to statement that *“properties are not contiguous to properties zoned RI”*. Though not adjacent to properties zoned RI, these parcels are bounded on two sides (East and South) by properties located within the City of Bremerton and zoned Industrial and have similar current and future uses. As previously mentioned, Kitsap Quarry is an established industrial use (50+ years) adjacent to other industrial uses and zoning that is within the City of Bremerton. The industrial uses at Kitsap Quarry predate the Growth Management Act. The parcels in question may have been designated URS originally because the access was via Kitsap Lake Road (Residential). Now that truck traffic is entering/leaving via Werner Road (an existing industrial road) instead of Kitsap Lake Road (residential) it makes more sense from a public interest standpoint and is more consistent with the intent of the Growth Management Act to designate these parcels RI with the long term industrial designation when these parcels are incorporated into the City of Bremerton.

44-17

18.3. Rural Commercial/Industrial and Type III LAMIRD Reclassification

Requests. g. Though not adjacent to properties zoned RI, these parcels are bounded on two sides (East and South) by properties located within the City of Bremerton and zoned Industrial and have similar current and future uses.

This is a unique situation in which Kitsap Quarry is an established industrial use (50+ years) adjacent to other industrial uses and zoning that is within the City of Bremerton. The industrial uses at Kitsap Quarry predate the Growth Management Act. The parcels in question may have been designated URS originally because the access was via Kitsap Lake Road (Residential). Now that truck traffic is entering/leaving via Werner Road (an existing industrial road) instead of Kitsap Lake Road (residential) it makes more sense from a public

44-18

interest standpoint and is more consistent with the intent of the Growth Management Act to designate these parcels RI with the long term industrial designation when these parcels are incorporated into the City of Bremerton.

44-18
cont.



Welcome to the Ueland Tree Farm

We are pleased to open up the tree farm to the public for responsible, non-motorized recreation. Over the past half century our family has benefited from numerous private landowners opening up their properties to the public, allowing us to hike, bike, and engage in other recreational activities. We are happy to do the same for the Kitsap County local community. All visitors should remember that UTF is an active tree farm. Please beware of logging and mining operations, truck traffic, wild animals, hunters, steep slopes, waterfalls, and other visitors, around other potential hazards.

In addition to allowing the public access to our tree farm, we are honored to be a founding participant in the creation of the Chico and Dickerson Creek Trails, which are accessible via the Lebers Lane Trailhead, which is located on property donated by UTF to Kitsap County in 2014.

Please enjoy your walk, hike, run, or mountain bike.

Enjoy and Welcome Aboard!

RULES

UTF is open to the public for the following uses:

- Hiking
- Walking Dogs
- Jogging/Running
- Mountain Biking
- Picking of berries and mushrooms
- Hunting (as regulated by the Department of Fish and Wildlife)

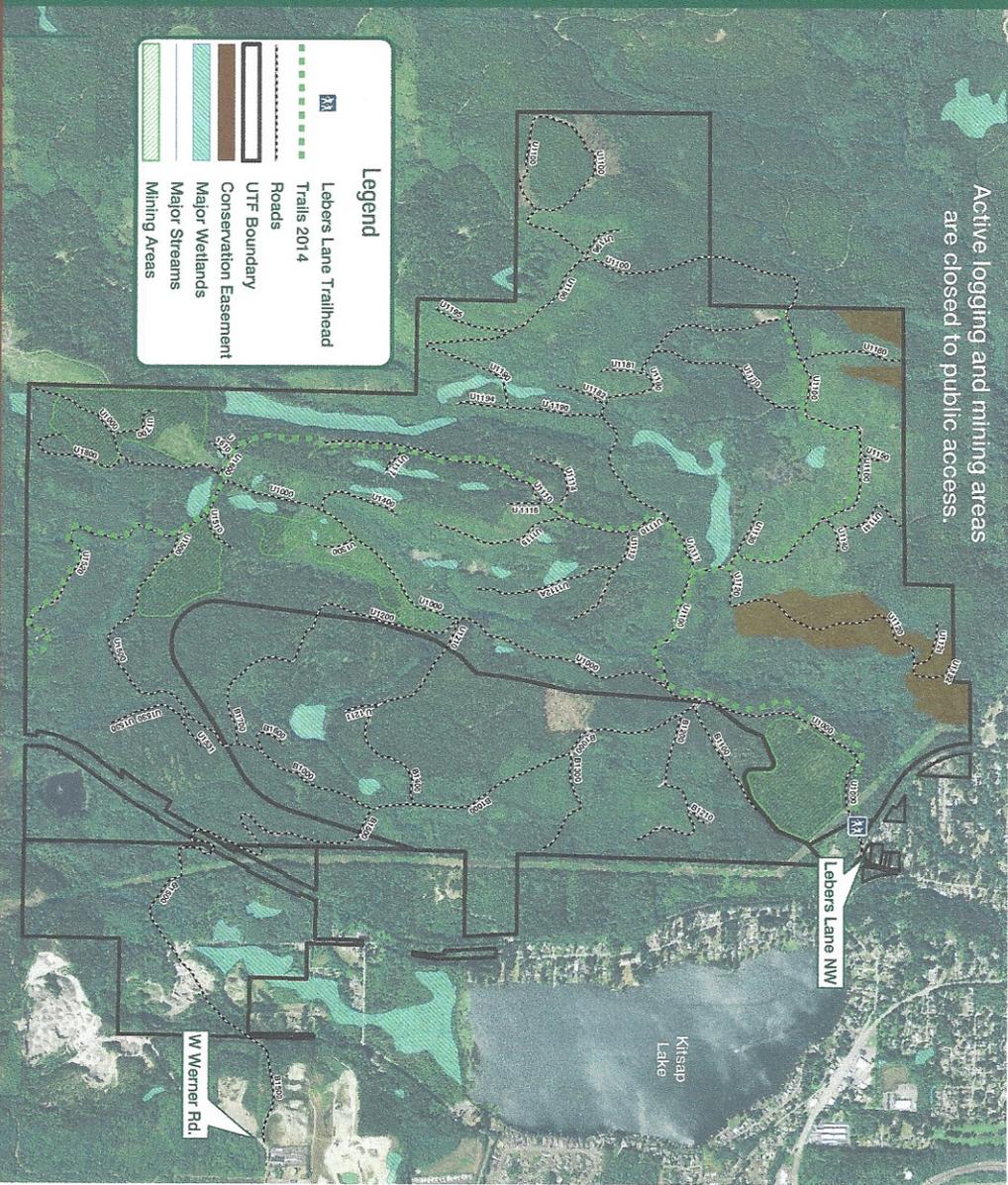
Restrictions/Prohibited Uses

- Prohibited uses include - but are not limited to - the following:
- Motorized vehicles, including ATVs
 - Camping or fires
 - Fireworks
 - Target Shooting
 - Cutting or harvesting of timber or vegetation
 - Any commercial, research or monitoring activities

Any exceptions to the above restrictions/prohibitions must be granted in writing prior to entering Ueland property. The owner also reserves its rights to prohibit or limit entry on to its property by any individuals or groups.



Active logging and mining areas are closed to public access.



This map can be downloaded to a smartphone by scanning this QR Code. The map is in PDF format so it can be viewed in Adobe Reader (adobe.com) AND it can be viewed using GPS, positioning by installing "PDF MAPS" from the Apple Apps Store or the Google Play Store.



October 23, 2013

To Whom It May Concern:

My Name is Lenny Brown, I have lived in Kitsap County since 1949. In the 1950's I remember visiting Kitsap Quarry except at the time the owner Tom Boren had the mill located where the current settling ponds are located. The mill sold lumber locally as well as bark. The saw mill stopped operating in 1964. In 1980 I started working for Dick Martin at Kitsap Quarry. In 1980 and worked there for 2 years.

Sincerely,

A handwritten signature in cursive script that reads "Lenny Brown".

3450 Lake Hurst Drive
Bremerton, WA. 98312

Jerome Mischel
1933 SW Berry Lake Rd.
Port Orchard, WA. 98367
October 14, 2013

Mark Mauren
Bremerton West Ridge, LLC
9401 N. Harbor View Drive
Gig Harbor, WA. 98332

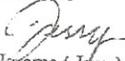
Dear Mark,

In regards to the uses of the Kitsap Quarry Site prior to quarry operations, as a boy, I recall Tom Bourn operating a sawmill there during the 1950s, before he started the quarry operation in the early 1960s. I believe he mainly cut Alder and Maple logs.

Reviewing our father's old ledgers, I found entries for log payments from Tom Bourn for \$300.00 on March 12, \$157.32 on April 18 and \$150.00 on May 8, 1957. I can only guess the amount per M, perhaps \$30 to \$40. Somewhat different from today but, I recall there was always food on the table, cookies in the cookie jar and a warm bed.

Good luck on future endeavors at Kitsap Quarry and Bremerton West Ridge.

Sincerely


Jerome (Jerry) Mischel



**COUNTY OR MUNICIPALITY
APPROVAL FOR
SURFACE MINING
(Form SM-6)**

NAME OF COMPANY OR INDIVIDUAL APPLICANT(S)
Same as name of the exploration permit holder. (Type or print in ink.)

Bremerton West Ridge, LLC

TOTAL ACREAGE AND DEPTH OF PERMIT AREA
(Include all acreage to be disturbed by mining, setbacks, and buffers,
and associated activities during the life of the mine.) (See SM-8A.)

Total area disturbed will be 34 acres

Maximum vertical depth below pre-mining topographic grade is
200 feet

Maximum depth of excavated mine floor is 220 feet
relative to mean sea level

MAILING ADDRESS

9401 North Harborview Drive
Gig Harbor, Wa
98332

Telephone (253) 307-5900

COUNTY Kitsap

No attachments will be accepted. Legal description of permit area:

1/4	1/4	Section	Township	Range
SE	NW	20	24	1E
NE	SW	20	24	1E

Proposed subsequent use of site upon completion of reclamation

Forestry

Signature of company representative or individual applicant(s)

Name and title of company representative (please print)

Chief operating officer
Mark Mauren

Date signed

1/2/14

TO BE COMPLETED BY THE APPROPRIATE COUNTY OR MUNICIPALITY:

Please answer the following questions 'yes' or 'no'.

1. Has the proposed surface mine been approved under local zoning and land-use regulations?
2. Is the proposed subsequent use of the land after reclamation consistent with the local land-use plan/designation?

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>

When complete, return this form to the appropriate Department of Natural Resources regional office.

Name of planning director or administrative official (please print)

Address

Signature

Title (please print)

Deputy Director, Bldg Official

Jeffrey L. Rowe, CBO

Telephone

(360) 337-4316

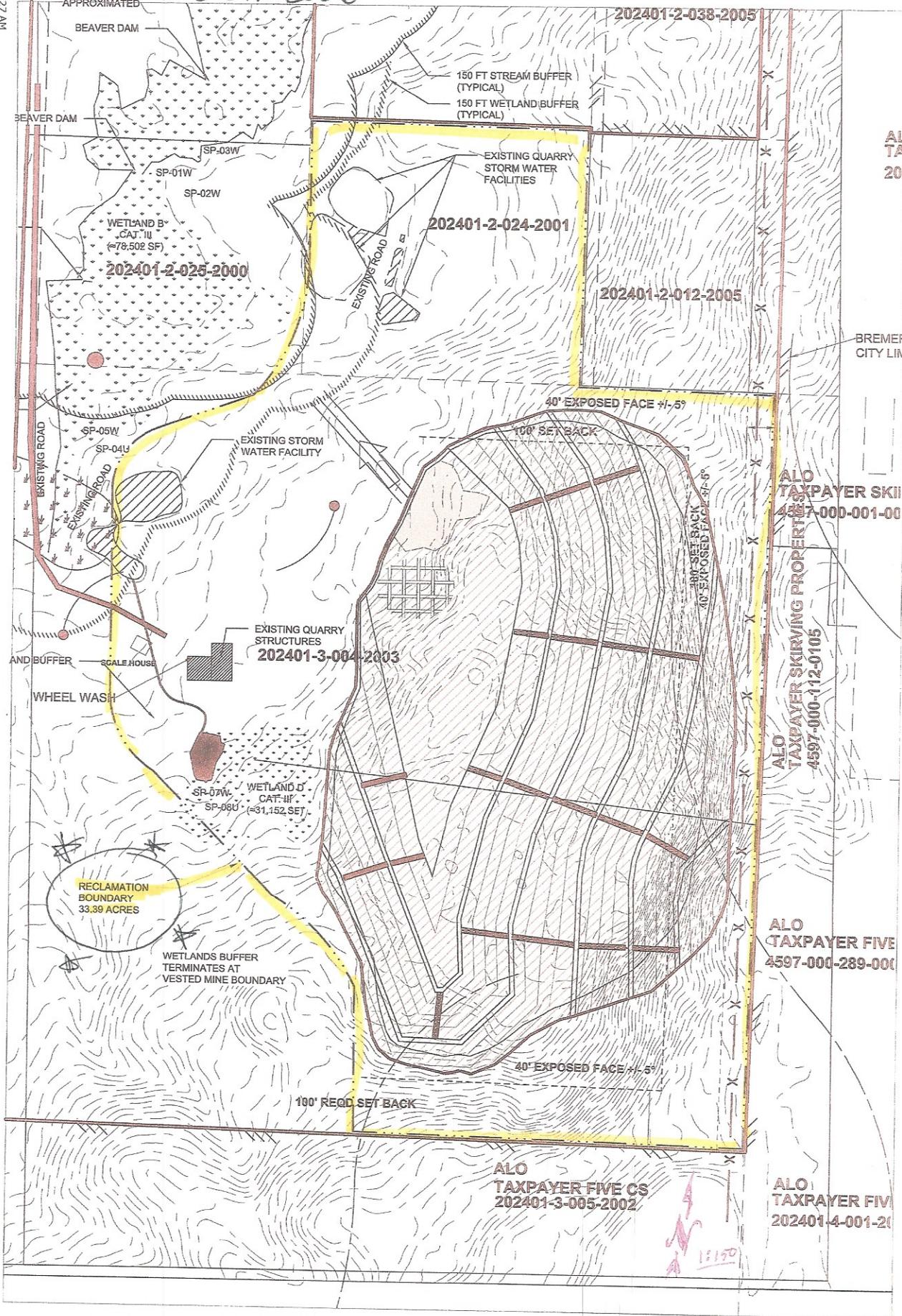
Date

1/10/2014

DNR Reclamation Permit No.

FOR DEPARTMENT USE ONLY:

202401-2-011-2006



AL TA 20

BREMER CITY LIM

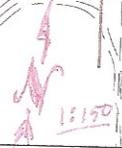
ALO TAXPAYER SKII 4597-000-001-00

ALO TAXPAYER SKIRVING PROPERTIES 4597-000-112-0105

ALO TAXPAYER FIVE 4597-000-289-000

ALO TAXPAYER FIVE CS 202401-3-005-2002

ALO TAXPAYER FIV 202401-4-001-2006



5A



Alliance Testing Services
Po Box 2377
Renton, WA 98056
425-757-0762

Mark Mauren
Ueland Tree Farm, LLC
6323 Pioneer Way East
Puyallup, WA 98311

December 4, 2015

Mr Mauren,

At your request, Alliance Testing Services conducted a geologic field study of the area of Kitsap Quarry and surrounding parcels. Kitsap Quarry currently mines Eocene Basalts, but is bound on both the immediate north and south of the formation by Pleistocene sand and gravel deposits trending in a NE/SW line. After review of the available LiDAR data ATS walked the parcels to the south to correlate the LiDAR images with the actual deposits present on the ground. It was determined that there are extensive sand and gravel deposits that lie immediately to the south of the quarry and trend in a line following the length of the valley. Previous studies of the area by the USGS documented this region in a report titled Geology and Groundwater Resources of Kitsap County WA, identified the valley that runs from Kitsap lake to Heins Lake, and continues on to Gorst as an Ice marginal outwash deposit with sand and gravel thicknesses up to 100 feet thick. This previous assessment was verified in the field, and aggregate samples were taken to determine the quality of the aggregate available. Laboratory data indicates that the available aggregate is of high quality that would exceed state specifications, while being fairly easily extractable due to the lack of overburden. I have attached along with this letter, The USGS map showing the location of the area studied.

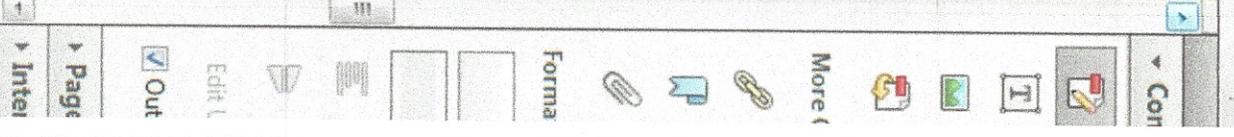
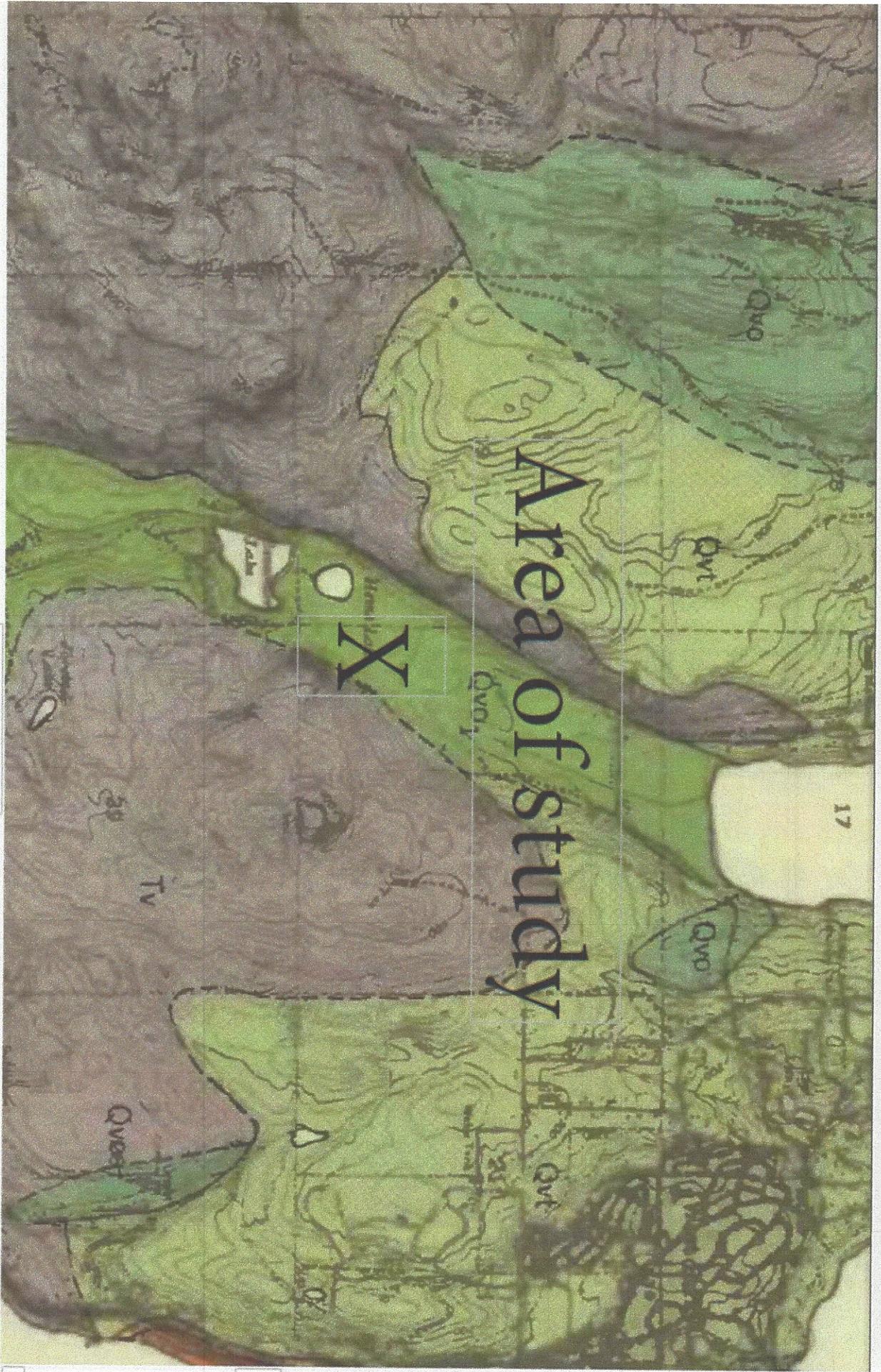
Sincerely,

Mike Costello
Geologist
Alliance Testing Service

5B



Tools



Jerry and Judy Mischel
1933 SW Berry Lake RD.
Port Orchard, WA. 98367
(360) 876-3714
jomischel@q.com
November 30, 2015

Comprehensive Plan Update
Planning and Environmental
Programs Division
DCD, MS-36, 614 Division Street
Port Orchard, WA. 98366

RECEIVED
DEC 04 2015
KITSAP COUNTY DEPT OF
COMMUNITY DEVELOPMENT

Dear Ladies and Gentlemen,

We are writing in regard to possible zoning changes in the Berry Lake, Old Clifton Road area. The alternatives which have been proposed seem to indicate that a very low density(one dwelling per 10 acres) is preferred in this area. We believe this is counter to which is already on the ground.

46-1

The Berry Lake Garden Tracts have existed for many years as five acre tracts and some have been divided into smaller tracts. The vast majority of properties in the area of proposed Rural Restrictive Zoning are five acres or less. It would seem that the purpose of said zoning makes little sense since these legacy lots already exist. Perhaps the purpose is to create nonconforming lots which will give the County greater leverage over the owners of said lots, but I would hope the County would give some consideration to the property rights of the individual people.

We have already created a donut hole between the parts of Port Orchard, which seem counter to the goals of Growth Management to consolidate growth. Berry Lake, Anderson Hill and Clifton carry the traffic, both private and City vehicles, to and from McCormick Woods, Capstone, McCormick Meadows and other Sunnyslope area developments.

46-2

For those who wish to live on ten acres or greater parcels, we certainly hope they can; but that right should not eclipse the rights of the majority of the people who own smaller parcels. Staff has indicated environmental concerns for this zoning, which may be true, but every property has these concerns and means to address them. As to the comments that this particular area has not had any demand for growth, that seems like a catch 22 answer. The City cannot consider annexation, because of zoning, and those interested in development or dividing cannot, because of currently imposed Urban Reserve zoning. It was assumed when our one acre zoning was taken away 20 years ago, that the Urban Reserve Zoning would lead to a slow organized infill of the area. However, when the last revision of the Growth Management Plan was completed, land was taken from rural areas and added to the Urban Growth Area. Question, why was Urban Reserve Zoning created in the first place?

46-3

It would seem as if the Urban Reserve Zoning should be used as intended, and if there are areas, such as on Philips Road, which wish to be removed from Urban zoning, that should happen. Bottom line, if we are Urban Reserve use as intended, and allow a slow conversion to Urban Restrictive, or if we are Rural, make it a density which reflects the true current lot density.

46-4

Thank You,
Jerry Mischel
Judy Mischel
Jerry Mischel, JudyMischel

We, the undersigned, petition the DCD and Kitsap County Commissioners to enact regulation to prohibit short term rentals for Rural Residential (RR) coded areas of Kitsap County and to define short term rental as rental agreements of less than 30 days.

67-1

The practice of VRBO is transforming our rural residential neighborhood into a commercial business/resort vacation district. It changes the nature and characteristics of our neighborhood community. It results in a loss to neighboring permanent residents the enjoyment of peaceful occupancy of their own homes and beach properties. It violates the intent of RR zoned neighborhoods. Thank you.

NAME	PHYSICAL ADDRESS	SIGNATURE	MAILING ADDRESS
R.S. Gustafson	12028 NE APPLE TREE PT. LANE	<i>[Signature]</i>	PO BOX 2016
LW Gustafson	Kingston, WA 98346	<i>[Signature]</i>	KINGSTON, WA 98346
Gina Vigna	12092 NE Apple Tree Pt Ln	<i>[Signature]</i>	PO BOX 472, Kingston 98346
Mark Vigna	12092 NE Apple Tree Pt Ln	<i>[Signature]</i>	PO BOX 472, Kingston 98346
Joyce Palermo	12102 NE Apple Tree Pt Lane	<i>[Signature]</i>	PO BOX 387, KINGSTON 98346
JOSEPH CREMONA	12102 NE Apple Tree Pt Lane	<i>[Signature]</i>	PO BOX 387 KINGSTON WA 98346
Jan Lindsay	12060 NE Apple Tree Pt Lane	<i>[Signature]</i>	PO BOX 1518 Kingston 98346
Jane Van Antwerp	12116 NE Apple Tree Pt Lane	<i>[Signature]</i>	PO BOX 499 Kingston 98346
SHARON REDPATH	12004 NE Apple Tree Pt Lane	<i>[Signature]</i>	PO BOX 1862, KINGSTON "
Amanda Redpath	12004 NE Apple Tree Pt Lane	<i>[Signature]</i>	P.O. Box 1862 Kingston "
Clarelia Pang	12084 NE Apple Tree Pt Lane	<i>[Signature]</i>	P.O. Box 897 Kingston "
CHARLES Young	12084 NE Apple Tree Pt Lane	<i>[Signature]</i>	PO Box 897 KINGSTON WA 98346
JAMES D. LINDSAY	12060 NE Apple Tree Pt Lane	<i>[Signature]</i>	P.O. Box 1518 KINGSTON WA 98346
Jane Grey		<i>[Signature]</i>	B210 90th Ave SE Mercer Island, WA 98040

Notes and comments on 2016 Comp Plan

Tom Nevins - Nov 24, 2015

These notes are being prepared prior to any public comment review, public hearing input, or Planning Commission discussion. These are initial thoughts only and are subject to change upon convincing input.

Text in quotes "" are from staff reports. // Site Specific Amendments// Permit Number: 15 00697 | Bair

Recommend denial of site specific amendment request:

DOES NOT MEET CRITERIA. spot rezone sets a precedent/. not supported by the Economic Development vision statement./

NOT CONSISTENT RL-8. Unlimited expansion of commercial and industrial

uses in the rural areas is not appropriate. "The parcel is zoned RR and surrounded by other properties with the RR designation." "The County aims

to focus a greater share of growth into the urban areas. The proposed amendment is inconsistent with this goal as it would increase industrial

development intensity and capacity in the rural area and introduce a single

isolated RI parcel in an otherwise RR zone." (See highlighted text)// Permit Number: 15 00522 | Bremerton West Ridge

Recommend denial of site specific amendment request:

No unmet need. Resource extraction is presently allowed. No need for industrial land.

71-1

Permit Number: 15 00607 | Cornerstone Alliance Church

Recommend denial of site specific amendment request:

Staff report seems to support rezone and perhaps a LAMIRD. However, this change would put pressure to change other contiguous properties and a possible access to highway at curve in the road. If access is

allowed, it may be used as a 'short-cut' to avoid traffic light at intersection. There are existing industrial/commercial lands available/vacant/under used north in Poulsbo and south in Silverdale. The

justification that the rezone will provide local jobs and services is unsupported by data.

71-3

Permit Number: 15 00641 | Curtiss Avery

Recommend denial of site specific amendment request:

Bremerton opposed. Property may not be 'ripe' for development. Access to sewer seems to be the reason for rezone request. "The site has not been specifically planned for sewer service by the County or City; sewer service was addressed broadly in 2006 in the evaluation of UGAs but specific sewer capital plans were not prepared for this site "

BE AWARE: It is included in the Bremerton UGA under Alternative 2 and Alternative 3. This inclusion should be thoughtfully and specifically questioned.

71-4

Permit Number: 15 00378 | DJM Construction

Recommend denial of site specific amendment request:

"not in the public interest as it would expand the logical outer boundary of the existing Type I LAMIRD boundary to include an undeveloped forested property with significant environmental constraints and building limitations."

"Expanding the LAMIRD Boundary and up zoning 8.36 acres of undeveloped property with significant wetlands appears contrary to the vision statement with respect to the natural environment. The proposed action would also alter the logical outer boundary of the LAMIRD and could affect the local character which currently has a visual separation between the LAMIRD and abutting rural large lots to the east and south. "

71-5

Permit Number: 15 00737 | Edwards – Mountain View Meadows

71-6

Reserve judgment
- seems 'ripe' for development. Supportable need? Can Silverdale Water Dist. provide?

71-6
cont.

Permit Number: 15 00692 | Eldorado Hills, LLC
Recommend denial of site specific amendment request:
Consider UL when a future need arrives. Avoid low density development in UGA.
May be better to include all of El Dorado Hills and this property as UGA UL in a future revision. For now, the application seems weak.

71-7

Permit Number: 15 00738 | Fox – Harbor Rentals
Reserve judgment:
What is the unmet need. This rezone increases the number of rural lots.

71-8

Permit Number: 15 00686 | Garland
Recommend denial of site specific amendment request:
Creates lots in rural area. There is no need.

71-9

Permit Number: 15 00657 | Gonzalez
Recommend denial of site specific amendment request:
See Cornerstone Church

71-10

Permit Number: 15 00724 | Harris
Reserve Judgment:
Question present land use map.
Determine need.

71-11

Permit Number: 15 00740 | Laurier Enterprises, Inc.
Support: Urban High-Intensity Commercial/Mixed Use.

71-12

Permit Number: 15 00714 | McCormick Land Company
Recommend denial of site specific amendment request:
Creates additional lots in the rural area. "The number of potential lots under the proposed RR zoning on the site is 16. Under the current RW zoning, the number of potential lots is 4. "

71-13

Permit Number: 15 00711 | Merlinco, LLC
Recommend denial of site specific amendment request:
Commercial growth should occur in UGAs, not rural areas. No need has been identified, just a desire.
"The amendment would allow for additional commercial growth in the rural area on a property that is already in single-family use rather than a UGA. "

71-14

Permit Number: 15 00703 | Port Orchard Airport
Neutral: This will pass. Airfield will be non-conforming.

71-15

Permit Number: 15 00461 | Porter
Neutral: This will pass. Minimal consequence.

71-16

Permit Number: 15 00701 | Prigger

Recommend denial of site specific amendment request:

Staff report seems to support this rezone based on perceived need for 'employment capacity.' This ignores the unused capacity of SKIA. How did the county decide to abandon the concept of need in determining land use? There seems to be a supply of industrial land in Kitsap sufficient for the planning period and beyond. Creating more excess will not create more 'family wage jobs'. Excess optimism has been shown to lead to poor planning.

71-17

Permit Number: 15 00736 | Rodgers

Support: Aware that "approval of the amendment request would result in a wider range of commercial uses being allowed on the property. "

71-18

Permit Number: 15 00722 | Royal Valley LLC

Neutral: This will pass.

71-19

Permit Number: 15 00380 | Ryan

Recommend denial of site specific amendment request:

"The proposed amendment does not appear to be in the public interest."

"The proposed zoning amendment does not support the vision for urban areas, economic development, or the natural environment. Designating a single isolated parcel for high-intensity commercial development in an area otherwise designated for low-density residential use does not promote mixed-use neighborhoods and would negatively impact adjacent residential areas. "

71-20

Permit Number: 15 00739 | Schourup LLC

Recommend denial of site specific amendment request:

"The County has updated its buildable lands analysis showing there is an employment capacity surplus in the Bremerton UGA under present designations and boundaries."

SKIA has insured this for many years to come.

"It may not be in the County's interest to approve the amendment if additional employment capacity is added by virtue of approving this request. "

71-21

Permit Number: 15 00735 | Sedgwick Partners

Recommend denial of site specific amendment request:

"While the vision for urban areas is to create mixed-use neighborhoods introducing a single high intensity commercially zoned parcel into an established single-family neighborhood is not desirable."

"The proposed amendment is not consistent with Policy LU-29 as it would create an isolated commercially zoned property in a residential neighborhood rather than support more intensive nodes of mixed-use development."

71-22

Does this change set a precedent for increasing commercial in this location?

Permit Number: 15 00742 | Tallman

Recommend denial of site specific amendment request:

"the proposal would increase the supply of land available for rural development when the County is conversely looking to increase the percentage of growth that occurs in the urban areas. " "The requested zoning amendment promotes growth in rural areas instead of in urban areas. Allowing a zoning change to RR would create pressure for other RW undeveloped properties in the immediate area."

71-23

And, perhaps wherever parcels larger than 10 acres exist.

Permit Number: 15 00725 | Tracyton Tavern

71-24

Support: Minimal consequence. | 71-24 cont.

Permit Number: 15 00710 | Trophy Lake Golf Course

Recommend denial of site specific amendment request:

Zone change would allow the creation of additional building lots in the rural area. The non-conforming use can continue.

71-25

Tom Nevis Comments

Permit Number: 15 00657 | Gonzalez

Keypoint JUNCTION LAMIRD PROPOSAL

(Included as part of the 2016 Comprehensive Plan Update Supplemental Environmental Impact Statement (SEIS) Alternative 2 as a change to Rural Industrial in association with a Type III LAMIRD)

Rural Commercial/Industrial / Type III LAMIRD. Each of the following requirements should be satisfied for a recommendation for this designation. (Included as part of the 2016 Comprehensive Plan Update Supplemental Environmental Impact Statement (SEIS) Alternative 2 as a change to Rural Industrial in association with a Type III LAMIRD)

a. Demonstration of an unmet need for the proposed land use designation in the rural area.

No unmet need has been identified. The subject property and surrounding rural neighborhoods are already served by the City of Poulsbo three miles to the North and Silverdale three miles to the South. A large fraction of land within the proposed LAMIRD is vacant and zoned for commercial use.

b. Demonstration that Kitsap County's rural character will be preserved or unaffected by the change of designation.

The rural character surrounding the subject property is residential and wooded in nature and would be adversely affected by the introduction of commercial uses.

73-1

c. Demonstration that the proposed designation will principally serve the rural area.

The subject property is located along a heavily traveled state highway and it is likely that the proposed designation will not principally serve the residential area. Residents of the surrounding neighborhood are able to travel to the nearby Poulsbo and/or Silverdale for basic services and that would not change with the proposed zoning amendment.

d. Demonstration that appropriate rural services are available (i.e., water, wastewater disposal, etc.) and that urban services will not be required for the proposed designation.

Appropriate rural services are available. Urban services are not required for a rural commercial designation.

e. Demonstration that the proposal is contiguous to existing industrial or commercial zoning. (Exceptions to this policy must demonstrate a unique or exceptional need for the proposed land use designation).

The property is not contiguous to existing industrial or commercial zoning and no unique or exceptional need has been identified.

f. Demonstration that the property is sized appropriately for the proposed land use designation.

The property is approximately is appropriately sized for the proposed designation.
g. Demonstration that there is a lack of appropriately designated and available sites within the vicinity.

73-1
Cont.

No commercially zoned property is adjacent the subject property because it is appropriately designated a primarily rural residential neighborhood. Poulsbo is just 3 miles north of the subject property and appears to have sufficient available land to support additional commercial development. Silverdale is just 3 miles south of the proposed LAMIRD and is a designated growth center.

Appendix B:

Page 10, Urban Suitability,

Meaning of this sentence is unclear. "Should be limited to areas where aquifer recharge and stream flows are of issue or as interim measures that promote the future extension of advanced forms of wastewater service (see below)."

72-1

"Should be limited to areas where aquifer recharge and stream flows are of issue or as interim measures that promote the future extension of advanced forms of wastewater service (see below)."

RE: Central Kitsap UGA zoning changes

The re-zone along Highway 303 up to the Brownsville H'way allows commercial/industrial uses.

This is unneeded and removed the rural residential feel of more of H'way 303. There was once an attempt to limit the Highway 303/Wheaton Way commercial development northward movement at Fairgrounds Road. That was the community value a decade ago. Has that changed? Is there an unmet need? Unless compelling argument in favor, the zoning should not change.

70-1



PHONE (360) 598-3311
Fax (360) 598-6295
<http://www.suquamish.nsn.us>

THE SUQUAMISH TRIBE

PO Box 498 Suquamish, WA 98392-0498

December 7, 2015

Dave Greetham
Kitsap County Department of Community Development
MS-36, 614 Division Street
Port Orchard, Washington 98366

Subject: Draft Kitsap County Comprehensive Plan Updates 2015

Kitsap County lies within the Suquamish Tribe’s “Usual and Accustomed Fishing Area” (U & A). The Tribe seeks protection of all treaty-reserved natural resources through avoidance of impacts to habitat and natural systems. The Tribe urges Kitsap County to avoid land use decisions that will impact natural resources within the Tribe’s U & A. The Tribe has reviewed the draft and has the following comments.

General

Development regulations have not yet been released for review and a preferred alternative has not been identified, therefore Tribal comments are somewhat limited as we do not know specific details on how the county is proposing to implement the goals and policies identified. It is unclear if there will be future opportunities to address SEPA concerns when the development regulations are available.

74-1

Ensure that there are no inconsistencies between the Buildable Lands report, the draft Comprehensive Plan, the draft Capital Facilities Plan and the draft Supplemental Environmental Impact Statement (SEIS). See letter from Jerry Harless dated December 7, 2015 submitted via email for additional information regarding inconsistencies.

Site Specific Rezone Requests

74-2

As per the most recent buildable lands analysis the County has enough area currently to address the population and there is no need to expand the UGA’s at this time. To do so without appropriate need would violate the Growth Management Act. In addition, the need to identify new commercial and industrial lands should also be determined using population, employment forecasts and market assessments. Kitsap County has not defined additional needs for either of these designations and it is recommended that the County wait until the need arises before proceeding with the rezoning of properties, otherwise, this action is contrary to the GMA.

Schools, libraries, churches and other public amenities should be located near the majority of the population (in UGA's). These projects require urban services and extending services to projects located in the rural areas is not only expensive but contrary to the GMA. Allowing these developments and expensive service requirements also increases costs to the public.

74-3

The Tribe does not support the rezoning of rural protection parcels to more intensive uses. These areas were zoned rural protection due to the fact that they were constrained over 50% by critical areas such as wetlands, streams or steep slopes. Additional project specific comments are as follows:

74-4

Permit Number: 15 00378 - DJM Construction

The Tribe does not support the expansion of an existing Type I LAMIRD boundary to include an undeveloped forested property with significant environmental constraints and building limitations. The appropriate logical outer boundary of the existing George's Corner LAMIRD was subject to review by the Growth Management Hearings Board in 2005 and upheld. The proposed amendment would expand the logical outer boundary and would not be compliant as per RCW 36.70A.070(5)(d).

Grovers Creek is approximately 5 miles long and includes several unnamed tributaries. This drainage is by far the largest contributing to Miller Bay and is characterized as very low gradient with large wetland plateaus. Grovers Creek supports fall Chinook (primarily hatchery returns), chum (to hatchery rack at RM 0.05) and coho, Puget Sound steelhead (ESA listed) and cutthroat to the headwaters.

The Suquamish Tribe is concerned about stormwater impacts resulting from any increase in impervious surfaces. The Tribe is concerned as Grovers Creek has unique features, which make it particularly sensitive to stormwater and groundwater impacts. Stormwater runoff is known to increase the frequency and magnitude of peak flows, as well as increasing erosion, fine sedimentation, bank instability, and reduced baseflows. Ongoing and pending development (reduction in recharge and increase in impervious surfaces and groundwater withdrawals) in the watershed poses significant risk to the ability to maintain the natural hydrographic regime in the watershed. Streamflow data for Grovers Creek collected by the Suquamish Tribe near the hatchery from March through December 1993 measured an average monthly flow of 7.19 cfs, a maximum monthly flow of 27.2 cfs, and a minimum monthly flow of 1.47 cfs (*Salmonid Habitat Limiting Factors*, Washington State Conservation Commission November 2000). The Department of Ecology has determined that Grover's Creek and tributaries exhibit low summer flows and have the potential for drying up or inhibiting anadromous fish passage during critical life stages. Therefore, no further water is available for consumptive appropriation from June 1 – October 15 (*Salmonid Habitat Limiting Factors*, Washington State Conservation Commission November 2000).

74-5

As you know the Suquamish Tribe operates a Chinook and chum salmon hatchery on Grovers Creek near the head of Miller Bay. The hatchery uses water from the creek to raise fish. The purpose of the Suquamish enhancement effort is to restore salmon on- and near- the reservation. As a result all fisheries (non-Indian sport and commercial) are intended to benefit. The incubation and rearing success of these juvenile salmon is very important to the overall Chinook program throughout Kitsap County to provide broodstock. The Grovers Creek hatchery is also the mid Puget Sound indicator stock for Chinook salmon under the U.S. Canada Salmon Treaty. Unlike most hatcheries the Grovers hatchery is designed to promote the upstream passage of fish and also allows for egress of smolts. The Tribe is passing all returning coho upstream of the hatchery facility. We are recovering the tags and enumerating the natural and adult wild coho status. In the spring we then count the out migrating smolts. All cutthroat and steelhead are also passed upstream of the hatchery. The Suquamish Tribes salmon hatchery is already impacted by problems associated with changes in water quality and quantity. The incidence of bacterial gill disease, which is generally associated with water quality degradation, has increased at the hatchery even though the number of fish reared and hatchery practices did not change. Also, Chinook rearing time has been truncated due to insufficient water quantity at progressively earlier dates in the spring thus further compromising rearing practices.

Grovers Creek is on the CWA 303(d) list of impaired water bodies for exceedance of fecal coliform criteria. The Bremerton-Kitsap Health District has been collecting water quality information at five locations in the

Grovers Creek watershed since 1996. Identified water quality concerns include high fecal coliform levels and consistent observations of dissolved oxygen levels (*Salmonid Habitat Limiting Factors*, Washington State Conservation Commission November 2000). To prevent continued degradation we need to maintain wetland and riparian functions throughout the watershed, prevent additional wetland filling associated with residential and commercial development and ensure that the most up to date stormwater protection is implemented on any pending or future development within the watershed.

74-5
Cont.

Permit Number: 15 00522 - Bremerton West Ridge

The Tribe has concerns regarding additional densities and more intensive uses in the Chico Watershed. The Chico Creek drainage is one of the largest and most productive in East WRIA 15. Almost 68 miles of streams and tributaries compose the Chico Creek watershed, of which approximately 17 miles are accessible to anadromous salmonids (Kitsap Refugia Study). The four major tributary streams to Chico Creek include Kitsap, Dickerson, Lost, and Wildcat creeks. There are also two major lakes in the watershed, Kitsap and Wildcat lakes. Chico Creek enters Chico Bay on the western shore of Dyes Inlet at the community of Chico. The drainage supports chinook, chum, coho, steelhead (ESA listed), and cutthroat. The Mountaineers Foundation has acquired over 400 acres of pristine habitat at the junction of Lost/Wildcat/Chico creeks that should provide essential long-term habitat protection; this acquisition includes one of the only remaining late successional forests on the Kitsap Peninsula. Kitsap Creek, between Kitsap Lake and the mainstem of Chico Creek, is critical habitat for chum, steelhead (ESA listed), and coho.

74-6

Permit Number: 15 00380 - Ryan

The Gorst Creek watershed supports runs of Chinook, coho, and chum salmon as well as steelhead and cutthroat trout. Sockeye are occasionally observed although it is unknown whether they are of local origin. The lower mainstem of Gorst Creek has historically supported heavy spawning activity by chum salmon, although this segment has been affected by development and road encroachment. The headwaters located to the north of SR-3 are in good condition (Kitsap Peninsula Salmonid Refugia Study, 2000).

The Suquamish Tribe operates two Chinook rearing ponds and yearling fall Chinook raceways within the lower mainstem. This program was established in 1981 as a cooperative effort with WDFW, the City of Bremerton, and the Poggie Club to provide salmon for both Tribal and sport harvest (*Salmonid Habitat Limiting Factors*, 2000).

74-7

In 1999 the City of Bremerton was awarded a \$386,000 Salmon Recovery Funding Board (SRFB) grant to remove 750 feet of concrete channel and restore over 1000 feet of meandering stream channel. This was the first SRFB project awarded to East Kitsap WRIA 15. Former Bremerton Mayor Glenn Jarstad is promoting a long-term plan to purchase all the properties downstream of this project and restoring the entire lower 0.8 miles of Gorst Creek (*Salmonid Habitat Limiting Factors*, 2000). The addition of significant amounts of impervious surfaces associated with urban high intensity commercial/mixed use development and associated parking directly adjacent to Gorst Creek are in direct conflict with these efforts to restore habitat.

Draft Supplemental Environmental Impact Statement (DSEIS)

The most recent Buildable Lands Analysis indicates that there is sufficient land in the UGA that expansion is not warranted at this time. Therefore the text for Alternative 1 stating that there is insufficient room is not correct. This also makes Alternative 3 not a viable option as any expansion of the UGA violates the GMA and would leave the county vulnerable to litigation. Alternative 2 appears to be the preferred option as it provides the most efficient use of land and provides better protection of critical areas in several key locations. However, without more detail (development regulations) we are unable to determine if the DSEIS is adequate. It should be noted that densification should not be located in areas immediately adjacent to critical areas or their buffers.

74-8

The DSEIS identifies that there will be additional sanitary sewer service needed. New development is not allowed to install septic in the urban areas.

74-9

The DSEIS relies on the KCC 19.400 Critical Areas Ordinance as a mitigation measure for critical area and associated buffer protection. This is somewhat misleading as many if not most projects occurring on properties with critical areas do not maintain the buffers identified to protect functions due to variances, buffer reductions, fill permits or reasonable use exceptions. The Tribe recommends developing and implementing a rigorous monitoring plan that tracks, maps, and evaluates the effectiveness or impacts of all permitted CAO and SMP code deviations.

74-10

The Tribe is also concerned that there are no policies and/or procedures relating to inadvertent discovery of cultural resources. The process does not have to be long or particularly detailed. However, it must be in partnership with the Tribe, coroner, and the Washington Department of Archaeology and Historical Preservation (DHAP) and may need to include other entities. Procedures should primarily consist of whom to contact (lead) and outline the procedures that follow.

74-11

There is no reference to the Chico Watershed Plan (Suquamish Tribe 2014) which identifies areas and actions for protection and restoration. The recommended strategies focus on resilience to future disturbance in the watershed (including changes driven by natural variability as well as human impacts) to ensure the continued productivity of chum salmon and help recover populations of coho and steelhead in the watershed. The Tribe requests that the County incorporate the Chico Watershed Plan by reference.

74-12

Draft Comprehensive Plan

Chapter 1 – Land Use

Page 12, Land Use Policy 9 and 10. Text states “Continue to review and assess data for application of reasonable measures. Measure, adopt and implement reasonable measure if the Buildable Lands Report finds inconsistencies in planned growth”. This policy needs additional detail on what this actually means. RCW 36.70A.215 (4) and CPSGMHB Case No. 04-3-0031c 1000 Friends Final Decision and Order states that the county is required to annually monitor reasonable measures however, it is unclear how and if this has occurred.

74-13

Chapter 3 – Environment

Page 41, Environmental Goal 1

The Tribe commends the County for recognizing and treating natural resources and the environment as important assets that require conservation and investment to support increased population, just like other public infrastructure. We look forward to working with the County on exploring ways that we can turn this principal into effective action so that habitat, natural resources, and the environment improve as our communities grow.

74-14

Page 43, Environmental Goal 3, Policy 15. Text states that compensatory mitigation shall be the last option of resort in mitigation sequencing. The emphasis should be on avoidance (avoid, minimize, then mitigate in that order) and if mitigation is determined to be necessary there should be a detailed description of what efforts were taken to avoid impacts to the extent possible. There should also be more discussion on compensatory mitigation including monitoring of all compensatory mitigation both at individual sites and at a landscape/watershed scale so that the effectiveness/impacts can be evaluated individually and cumulatively. Typically on-site and in-kind mitigation is preferred. If this is not possible or another option is more beneficial then supporting information must be provided.

74-15

Chapter 8- Subarea Plans

Trails are common components of both Neighborhood and Sub Area plans as part of open space and recreational components. However, it must be remembered that trails although providing an educational and recreational component do have impacts. Buffers are the areas that surround wetlands and streams and reduce adverse impacts to natural processes from adjacent development. The literature indicates that buffers reduce impacts by moderating the effects of stormwater runoff including stabilizing soil to prevent erosion; filtering suspended solids, nutrients and harmful or toxic substances, and moderating water level fluctuations. Buffers also provide essential habitat for various species for use in feeding, roosting, breeding and rearing of young, and cover for safety, mobility, and thermal protection. Buffers reduce the adverse impacts of human disturbance on wetland habitats including blocking noise and glare; reducing sedimentation and nutrient input; reducing direct human disturbance from dumped debris, cut vegetation, and trampling; and providing visual separation. (Wetland Buffers Use and Effectiveness, EPA, February 1992).

74-16

Pedestrian paths should be minimized to the extent possible and not intrude into the wetlands and streams or their associated buffers. Viewing platforms are acceptable and we understand that some buffer intrusion may be needed, however, the majority of the paths should try to avoid intrusion whenever possible. Tree removal should be minimized to the greatest extent possible. Creosote and Pentachlorophenol should not be used for any part of trail structures. The Tribe is concerned that development standards for trails are not always applied/followed, particularly on county park properties.

74-17

None of the plans goals and/or policies specifically identifies protection of natural and cultural resources. This is a significant oversight and needs to be remedied. Natural resources include but are not limited to streams, wetlands, riparian areas, and shorelines. Objectives including but not limited to the following would address some of these concerns.

74-18

- protect and enhance the habitat of aquatic resources;
- protect and enhance the water and sediment quality of shoreline areas to levels that provide for aquatic resources which are safe for human consumption;
- support and protect the rights of treaty tribes having usual and accustomed fishing, shellfish harvesting and gathering areas;
- and protect tribal access to aquatic resources.

None of the plans specifically identify or address reasonable measures. The Manchester plan does say that existing code will be maintained and enforced regarding legacy and nonconforming lots. However, it has been proven that this is not enough and additional measures need to be taken not only in Manchester but in any area that has legacy and nonconforming lots and/or sprawl.

74-19

Appendix G draft Reasonable Measures Assessment

- Clustering and master planned developments are not reasonable measures and do not reduce density. All references to clustering should be removed from the reasonable measures assessment.
- McCormick Woods and Arborwood are examples of sprawl and what should not happen in the future.
- Success should not be measured in plat applications. This does not take into consideration already existing legacy and nonconforming lots.
- Addressing legacy and nonconforming lots should not be a “recommendation for the future” this should already be occurring. The county should already be encouraging lot consolidation/aggregation/minimum lot sizes for development on legacy and/or nonconforming lots.

74-20

- Maintaining a variety of lot sizes in the rural areas should be emphasized. Currently all properties could be subdivided to a minimum of 5ac. Rural areas need to also include 10 and 20 acre parcels.
- This assessment has little to no information regarding success of previously implemented reasonable measures or recommended measures that need to be implemented for success.

74-20

Capital Facilities Plan

It is unclear what the status is of sewer facilities and the UGA's (percent currently serviced at the end of the planning period). It also appears that the county has an over reliance on maintaining septic systems within the UGA's. The Tribe understands that transition takes time but there also needs to be a degree of commitment.

74-21

Thank you for the opportunity to provide these comments. We look forward to submitting additional comments as more information becomes available. If you have any questions or would like to discuss these comments, please contact me directly at (360) 394-8447.

Sincerely,



Alison O'Sullivan
Biologist, Environmental Program

This email includes 75, 76, and 77 (out of order)

Emails from W. M. Palmer

Katrina, Dave, 76 - public participation comments

Last night I attended a City Council study session in Port Orchard. They had auxiliary power even though the rest of Port Orchard was black.

Among the topics discussed was Port Orchard’s comments on the three alternative land use maps for Port Orchard’s Urban Growth Area. The maps staff reviewed (or is still reviewing) was different from the maps Councilwoman Bek Ashby had in her possession. The confusion seemed to arise from the fact that what Kitsap County staff sent to the Port Orchard Planning Department was different than what Bek said she had gotten from the County’s website. No doubt you will hear from Port Orchard to the effect they favor the “no action” alternative unless they are given more time to respond than early December.

76-1

Apparently the City is not aware as to what Kitsap County’s time line is for public hearing consideration of the plan update and how the DSEIS process affects that schedule. They are only aware of the deadline for comments on the Draft Supplemental EIS.

If Port Orchard is given more time to respond, will that be true for others?

Aside from that question, I am quite concerned that there was no prior vetting process for any of the alternative plan proposals Port Orchard was asked to consider. Unlike Draft/Final Supplemental EIS alternatives for prior plan updates, these alternatives seem to have potentially a greater impact on people who own property or have paid taxes on commercial property for years. For example in the South Bethel Corridor one of the alternatives would take away the commercial zoning that many people have relied on for at least 13 – 14 years and others even longer. The concept of making existing business such as West Sound Landscape Supply or the Highway market nonconforming uses is.....patently absurd!

76-2

And who was it that thought that development in North Kitsap County is more important than South Kitsap? And why on earth was it ever a consideration to pull back the UGA in South Kitsap when West Sound Utility District is already committed via their water and sewer planning area and plans to serve Port Orchard’s UGA along with the City? In short there are a lot of issues that are reflected in the two, three? alternatives that should have been vetted with the public (not just staff in the “back room”) prior to their presentation in the Draft SEIS. For the record the actual plan alternative maps seem to be not readily available on the County’s website separately. They do show up in the DSEIS.....at a reduced size!

76-3

Back in 2006, the County took time to create some Citizen Advisory Groups and even supported those groups with DCD staff and/or consultants. So far the only such group formed was in Central Kitsap and that group has not met for at least three to four months. My belief is that the group was disbanded before any kind of summary report was prepared to include a recommendation for what land use provisions should occur in the Silverdale area. John Taylor

76-4

was the Kitsap Alliance of Property Owners appointee to serve on that citizen committee and it is his comments I am referencing about what the Central Kitsap group did or did not accomplish. Assuming John's participation and comments about what was accomplished are accurate, then there is a failure in the citizen participation process. And even if that group did accomplish something that escaped my notice, why was there no citizen group formed in South Kitsap County? There are just as many dedicated people who would have been willing to work on plan provisions in South Kitsap as there may be in Central or North Kitsap. Witness the hours of time spent by concerned citizens helping to craft the 2006 comprehensive plan update.

76-4
Cont.

It is also a "slap in the face" to the citizens north to south to be presented with alternative plan proposals only in the Draft SEIS process. Even the three "open house" meetings held this month did not really provide much opportunity to comment on the DSEIS alternatives. Witness the fact that the Power Point presentation did not have even one slide / graphic to show that there were even three alternatives or provide an explanation for how they were derived or what the implications might be to people living in or owning property in these UGA areas.

76-5

A year has gone by since the first announcement of the Comprehensive Plan update process back in October of 2014. Since that first round of "open houses" there has been nothing but an echo of silence about what DCD staff has been doing to craft a plan. Yes, questions went out to solicit the opinion of interested people, but nothing to indicate public opinion would even be a consideration in the plan update process. We citizens received no, as in nada, zilch, feedback regarding the comments we did submit. And none of the questions posed to the public had anything to do with how or in what context there might be plan alternatives developed or considered in the comprehensive plan proposal. Then early in October of this year in the midst of final election activities notice goes out that a DSEIS is available for a 30 day review with alternatives in it that had as stated above, no prior vetting.

76-6

Direct comments were solicited from Port Orchard (and I assume Bremerton and Poulsbo) about the provisions for its/their UGAs, but citizens were not accorded such favor! Yet, property and business owners have as much or more at stake with what the comprehensive plan provides than does the City. But.....their only notice was the issuance of the Draft SEIS and some maps to look at during the October, 2015 open houses. Was there even a presentation of the plan alternatives to the Realtors, the Home Builders, the professional community or the DCD Advisory Committee? Certainly KAPO received no such presentation or even a notice that the plan alternatives were available for review. And while I had to miss the last DCD Advisory Committee meeting on October 27th, the agenda for that meeting did not include a presentation of plan alternatives.

76-7

Aside from what is contained in the Draft SEIS, the next time anybody may see these alternatives or versions thereof, will be at a Planning Commission work study on December 9th. By definition a "work study" of either the Planning Commission or the Board of County Commissioners does not include opportunity for public comment. Citizens are not even at the

76-8

table to be involved any any kind of discussion. This process is a sham!!! 76-8 cont.

While the DCD staff may have limited manpower resources, that fact is not the creation of citizens, but it is property and business owners who will wind up paying a price for an underfunded and under staffed planning process. On behalf of the Kitsap Alliance of Property Owners, I am objecting to the kind of planning process where there is no attempt (and I mean no!) attempt to involve citizens in the development of the proposed plan or the proposed alternatives.

76-9

If somehow the DCD staff thinks that “open houses” and comments submitted to the County’s website constitutes citizen participation, then there is a serious lack of understanding of what meaningful citizen involvement in a comprehensive plan process looks like. Also these kind of measures are just “tokenism” and fail to rise to even the level of credibility of the Shoreline Master Planning process. What elected official or staff member believes a Shoreline Master Plan has any greater impact on the citizens of Kitsap County than the comprehensive land use plan?

76-10

Where is the “work study” with the citizens wherein there can be open dialog and open critique of proposed plan measures with assurances that our comments and recommendations will make a difference in what the final plan proposal will be? Why was the citizen participation process designed to make it possible for citizen input to be minimized and likely ignored? That is exactly what the public hearing process does. Without active dialog with citizens while crafting the plan, the message the County is communicating is.....we do not really care what you think or what works for the property or business owner. No the real message is “citizens” you can take the highway! We, the staff and elected officials know best and could care less about what you think – you got your three minutes at the podium, so good bye!

76-11

When backed into a corner citizens will appeal a plan or specific provisions of it, thereby costing the County even more money and time. What is our choice after all?

This time,

William M. Palmer, President
Kitsap Alliance of Property Owners

Direct comments were solicited from Port Orchard (and I assume Bremerton and Poulsbo) about the provisions for its/their UGAs, but citizens were not accorded such favor! Yet, property and business owners have as much or more at stake with what the comprehensive plan provides than does the City. But.....their only notice was the issuance of the Draft Supplemental Environmental Impact Statement and some maps to look at during the October, 2015 open houses. Was there even a presentation of the plan Alternatives to the Realtors, the Home Builders, the professional community or the DCD Advisory Committee? Certainly KAPO received no such presentation or even a notice that the plan Alternatives were available for review. And while I had to miss the last DCD Advisory Committee meeting on

76-12

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76-12
cont.

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76-13

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76-14

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76-15

When backed into a corner citizens will appeal a plan or specific provisions of it, thereby costing the County even more money and time. What is our choice after all?

This time, William M. Palmer, President Kitsap Alliance of Property Owners
Katrina, Dave,

75- overall process

In going over staff reports for the Comprehensive Plan Amendments I find that one of the criteria being used to judge compliance with Kitsap County’s Comprehensive Plan is the Countywide Planning Policies. A point I tried to make when I completed each of my several Site Specific Comprehensive Plan Amendment applications was that these policies could not be used to judge compliance with the County’s Comprehensive Plan unless there had been a prior action to include these same policies – particularly the amendments to those policies adopted by the Board of County Commissioners in the fall of 2011, in Kitsap County’s Comprehensive Plan.

75-1

Please understand the issue is not whether Kitsap County adopted the Countywide Planning Policies as they did that according to my memory in 1998 with the then latest revisions occurring on November 19, 2007. The further revisions, i.e. the 2010 / 2011 amendments in October / November of 2011. No, the issue is..... did Kitsap County ever take action to include the the CPPs in the County's Comprehensive Plan document? And specifically my question is where is the evidence that Kitsap County amended its Comprehensive Plan to include those 2011 CPPs amendments?

I have followed Kitsap County's Plan adoption and Plan amendment process fairly closely since 1978 and have been involved particularly as a member of the public during the entire course of GMA planning. Some things may have escaped my notice, but one issue I have tracked is the Countywide Planning Policies. I have made comment about them on several occasions and at least tried to discover whether or not Kitsap County or any of the Cities were going to include the CPPs in their comprehensive plans (by amendment). So far I have been unable to document that the County or any of the Cities incorporated the CPPs or any of the revisions in their respective comprehensive plans. For quite a few years I have been critical of Kitsap County's Comprehensive Plan and process (for many reasons) due to the fact the CPPs have not been included in (by amendment to) its Comprehensive Plan. My reading of GMA (RCW 36.70A.210) leads me to the conclusion that if the CPPs are to guide specific land use decisions, such policies must be included in and not be separate from the Comprehensive Plan.

The last time Kitsap County made any amendments to its Comprehensive Plan was in December of 2010. Even if the prior 2007 CPPs revisions had been included in that action, the amendments could not have been because they were not approved until October / November of 2011. Note the 2006 Plan amendments that came back to Kitsap County on remand did not have CPPs and no action was taken when addressing the remand issues to also include the 2011 CPPs in the final action on the 2006 Plan amendments.

So again I ask, by what comprehensive plan amendment action did Kitsap County include the CPPs or any of the amendments? The mere fact that Kitsap County along with the Cities may have adopted those policies is not the issue. By definition the CPPs are "framework policies" adopted with the purpose of providing guidance to member jurisdictions (of KRCC) in the preparation of their respective comprehensive plans. If such policies are to provide specific guidance to implementing ordinances, such policies must be included in the comprehensive plans.

You may remember that both Jack Hamilton and I provided extensive critique of the 2010 / 2011 proposed revisions to the CPPs. In short, the policies are poorly worded, not policies at all, filled with meaningless platitudes and at best offer poor guidance to any jurisdiction adopting them. The policies are so bad, Kitsap County's elected officials and staff should be embarrassed to admit either recommending them for adoption or that they adopted them. Of course Kitsap County ignored our critique and made not one single change in the policies to reflect any of our criticism and there was not one single response to either of our critiques or

75-1
Cont.

any portion there of. A significant fact worthy of note here is that there are 118 times when so called policies are worded such that they are “mandates.” Mandates are not policy! They are in fact prescriptive and therefore belong in an ordinance not a policy statement.

Jack and I tried to appeal the CPPs 2011 amendments to the Growth Management Hearing’s Board and were told by that Board that citizens like us did not have standing to make such an appeal. Further they instructed us that we could appeal such policies if they were included in Kitsap County’s Comprehensive Plan. The Board did not opine as to whether an appeal could be made if the County used those policies (without including them in its comprehensive plan) to make decisions about what actions make the County’s Plan compliant with the CPPs.

If the answer to the question I posed at the beginning of this e-mail is that there was no action taken by Kitsap County to include the CPPs in its Comprehensive Plan, then such policies cannot be used to judge what is compliant with its adopted Plan. If the argument is that any change to the Plan must be compliant with the CPPs, then the apparent fact is the CPPs have been included within the plan by reference and thus they are now subject to appeal. In either case I object to their use to judge individual Site Specific Comprehensive Plan Amendment requests. My concern also goes to the issue of how the County in good conscience can use any of these policies even as a “framework” for preparing its Comprehensive Plan, they are absolutely terrible.

I look forward to your response.

William M. Palmer
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77- overall process

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75-1
Cont.

77-1

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I look forward to your response. William M. Palmer

77-1
cont.



December 4, 2015

Katrina Knutson, ACIP
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614 Division Street, MS - 38
Port Orchard, Washington 98366

SUBJECT: Response To Staff Report For FSN, Inc. (Curtis-Avery) Site Specific Comprehensive Plan Amendment – Urban Reserve to Urban Low - Permit No: 15 00641. Reference Also Tax Parcels 4624-003-002-0109, 4624-003-003-0009, 4624-003-004-0008, 4624-003-005-0007, 4624-003-006-0006, 4624-003-007-0005, 4624-003-008-0004, 4624-003-009-0003, 4624-003-010-0000, 4624-003-011-0009, 4624-003-0112-0008, 4624-003-013-0007, 4624-003-014-0006, 4624-003-015-0005 & 4624-003-016-0004

Dear Katrina, Jeff,

This letter is a response to the Staff Report issued on November 9, 2015 analyzing the FSN, Inc. Site Specific Comprehensive Plan Amendment / Rezone proposal to reclassify and rezone their property on Kent Avenue West in Bremerton, Washington. This parcel is further referenced by the above Kitsap County Assessor / Tax Numbers. **Note for the record, the maps included with the staff report are not correct. The applicant owns fifteen (15) lots, not the 12 outlined on the Staff's map exhibits. The legal description included in the application material may have been somewhat confusing, but all of the above referenced Tax account numbers and parcels are/were represented in the applicant's graphics and in the attached legal description.**

78-1

It is noted that the staff report contains no specific recommendation. There are none-the-less implied recommendations or conclusions. Many of the comments made by staff seem to ignore the applicant's responses to the same questions. That begs the question as to how the two documents, i.e. the applicant's responses verses the staff's analysis is to be presented to the Planning Commission and ultimately to the Board of County Commissioners? Because that is unclear and because the staff analysis contains unsupported opinion and some inaccuracies it is necessary to object to much of what is in the staff report – particularly in the response to evaluation criteria. Also the format of criteria questions addressed by staff is problematic and therefore confusing as there are criteria questions not posed in the application material and there is a different order of criteria assessments not found in the Supplemental Site Specific Comprehensive Plan Criteria.

78-2

Herein are the applicant's objections to the staff analysis and comments as contained in the staff report:

Background –

The staff report mentions that the site is located in a "Moderate Geological Hazard Area" mapping feature. What is not discussed is the relevance of this feature to the proposed Site Specific Comprehensive Plan Amendment/Rezone proposal. In the SEPA Checklist the applicant submitted, the questions about site development limiting features were answered in the negative. What is not found in the Background section is mention of the fact that the subject site has been platted into 40 ft. by 100 ft. lots with a middle alley between the two banks of eight lots. Nor is there mention that the subject site is part of a large platted area called the "Replat of Port Orchard City."

78-3

Staff's mention of this environmental features is without context and the omission of the location of the subject property within a large platted area fails to accurately portray the nature of the property.

PUBLIC COMMENTS:

It is true as Staff reports that the City of Bremerton indicated lack of support for the proposed plan amendment. But it is worthy of mention that sewer service in the area comes not from the City of Bremerton, rather it comes from Kitsap County's system. In fact all of the Replat of Port Orchard City that Kitsap County has Zoned Urban Medium or Urban Low has sewer service from Kitsap County. Bremerton's UGA is an issue, but clearly not all of the "urban services" that support this area are from the City.

78-4

Prior to application submittal the applicant contacted Kitsap County Public Works to determine whether or not there were sewer system capacity issues that might preclude the extension of sewer to the subject property. The answer to that question was/is no as there is excess capacity in the County's system in this location. Also, because the applicant owns the lots immediately adjacent on the south, the applicant can extend the sewer line to serve that property and also serve the site that is subject to the Comprehensive Plan Amendment / Rezone request.

EVALUATION –

General Criteria (KCC 21.08.070.A)

These General Criteria questions were not part of the application material the applicant was required to address or at least not as worded and presented in the staff report. See also the comments recorded on Page 5 of this response regarding the Reclassification Request Criteria (KCC 21.08.070.D).

78-5

The objections addressed herein and in subsequent discussions regarding criteria compliance, reflect some of the answers to these questions as posed in the application material.

78-5
cont.

A.1. How circumstances related to proposed amendment and/or the area in which the property affected by the proposed amendment is located have changed since the adoption of the Comprehensive Plan or applicable development regulations -

78-6

Staff says that conditions have changed, therefore this criteria is satisfied. Also, Staff reports that Alternative 2 & 3 in the DSEIS include the applicant’s property in Bremerton’s UGA.

A.2. How the assumptions upon which the 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 -

78-7

Staff says “the assumptions upon which the Comprehensive Plan is based are still generally valid.” And that “there is sufficient projected population capacity to support the proposed Amendment / Rezone.”

Staff’s assessment and conclusions indicates there is compliance with this criteria.

A.3 – How the requested re-designation is in the public interest and the proposal is consistent with the Kitsap County Comprehensive Plan -

78-8

Staff says that “the County aims to focus a greater share of growth into urban areas.” If that analysis process allows, this site will be considered for inclusion in Bremerton’s UGA.

Since the Staff has not defined what constitutes “public interest” but indicates by Staff comments (without making a clear statement) that there is general compliance with the Comprehensive Plan.

Reclassification Request Criteria (KCC 21.08.070.D)

D.1.a – The proposed amendment meets concurrency requirements for transportation, sewer and water, and will not result in significant adverse impacts on adopted level of service standards for other public facilities and services, such as police, fire and emergency medical services, park services and general governmental services -

78-9

Staff essentially concurs with the applicant that there are no significant adverse impacts on adopted levels of service standards or other public facilities and level of service standards for other public facilities and services. See applicant’s response to Question 1.a found on Page 1 of the applicants “Supplemental Comprehensive Plan Amendment Criteria” discussion. The Staff comments are somewhat incomplete in that there is no mention of the fact the property has already been subdivided into small lots.

Staff recognizes the applicant’s analysis of the “concurrency” requirements for the proposed Amendment / Rezone property, but says “sewer capital plans were not prepared for this site.”

D.1.b – the proposed amendment is consistent with the balance of the goals, policies and objectives of the current Kitsap County Comprehensive Plan and reflects the local circumstances of the County –

The Staff assessment of this issue indicates consistency with the balance of the goals, policies and objectives of the current Comprehensive Plan.

Regarding the Staff comments that follow Exhibit 5 – County Vision for Rural and Urban Areas, the Staff says that “...an expanded UGA would support focused development in this area.”

78-10

The Staff’s analysis and conclusions are in general agreement with the applicant that there is compliance with this criteria

Kitsap County Comprehensive Plan Goals and Policies

Section 2.2 Urban Growth Areas of the Land Use Element of the 2012 Adopted plan –

Goal 5: Provide public services and capital facilities necessary to support planned urban growth at adopted levels of service for the 2025 planning horizon.

Policy LU-23 – Prioritize the UGAs for Kitsap County expenditures for public services and facilities as a tool to encourage development, to make urban areas desirable places to live, and to use existing infrastructure more efficiently and cost effectively.

78-11

Policy LU -24 - Prohibit extension of expansion of urban services and facilities in rural areas except in limited circumstances necessary to protect basic public health, safety, and the environment, and do not allow extensions or expansion in rural areas to create or encourage urban development outside the designated UGA.

Staff says that while urban services and facilities do not currently serve the site they are located in close proximity. Also indicated that is the fact the 2006 Comprehensive Plan sewer service in this area was addressed “broadly,” but no capital sewer plans were prepared for the site.

Staff Analysis and Conclusions are not conclusive, but indicate as discussed in Criteria D.1.a the close proximity of sewer represents compliance with this criteria.

Goal 6: Encourage and reinforce development patterns within UGAs that are distinct from those in rural areas.

Goal 11: Encourage new residential growth to locate within designated UGAs at higher densities than in rural areas.

Staff says the subject property is not in a UGA. The Staff goes on to say “Under the present plan and zoning, the site would remain rural and would be subject to URS density limitations.” And that: “the properties’ current vacant use and largely undeveloped land is not already characterized by urban growth.” There are two things missing from the staff’s characterization

78-12

of this analysis: a.) URS Zoning is not one of Kitsap County's Rural Zones. While it has density limitations like rural zoned property it is in fact not a Rural Zone like Rural Residential, Rural Protection or even Rural Wooded. Neither is it an Urban Zone. The reality is.....it is best classified as an "urban holding zone." It is the first place the County has elected to look to when a UGA expansion might take place; b.) the other missing part of this analysis is the fact that the subject property has been platted into 16 small lots, 15 of which are owned by the applicant. Thus the density issue is not speculative, the density equates to about 10 dwelling units per acre which is slightly higher than the maximum allowed in the Urban Low Zone.

78-12
cont.

So if the analysis of the site is candid, the conclusion is that the platted density is definitely not rural and in fact it exceeds the density allowance in Urban Reserve. The only issue that seems in doubt is whether or not the subject property could be fully developed at its platted density without sewer. The answer is yes, with individual septic systems. Perhaps that seems unlikely, but it is possible and the explanation for how is not important for this discussion. What the applicant believes is that solving the sewer disposal problem for these individual lots in best addressed with sanitary sewer service, which is available close by at a more reasonable cost.

With the noted supplemental analysis, the Staff's assessment leads to the conclusion that there is compliance with these Comprehensive Plan Goals.

Goal 8: Facilitate and encourage incorporation or annexation with associated cities of urban areas over the 20-year planning period and ensure compatibility of development with future planned uses within the unincorporated UGA consistent with the UGAMA process call for in the CCPs.

The Staff comments that follow this goal omit two important issues: 1.) Kitsap County as well as the City of Bremerton have not made the County-wide Planning Policies a part of their respective Comprehensive Plans and 2.) the County and the City have never negotiated an Urban Growth Area Management Agreement (UGAMA). Therefore compliance with this goal is not possible and it should be removed from consideration of the proposed FSN, Inc. (Curtis – Avery) URS to UL Comprehensive Plan Amendment / Rezone.

78-13

As a general comment, the platted configuration of the property, even though Zoned URS is compatible with the development pattern of the applicant's property adjacent on the south and the platted and developed property to the east that are both a part of Bremerton's UGA. **Staff assessment and conclusions about this goal are not valid.**

D.1.c – The subject parcel(s) is suitable for the requested land use designation based upon, but not limited to, access, provision of utilities, consistency with existing and planned uses, environmental constraints and compatibility with the neighborhood –

See above comments regarding Goal 8.

Staff says the proposed amendment would be compatible with the development pattern to the east "...currently Zoned UM and UL." But Staff says, "With its existing use as undeveloped land, it is more compatible with surrounding areas to the west that have rural zoning designations and not with UL designation characteristics.

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Clearly the Staff's description of land to the west of the site is not entirely accurate. South and southwest of the site is Urban Low. Directly west the Zoning is URS. Per the discussion comments for Goal 8, URS is not a rural zone. Also to be recognized that even though the subject site is vacant land it is platted property in the same configurations and density as the property south and east of the site. Undeveloped platted land (especially at a density of 10 dwelling units per acre) does not have the same characteristics of undeveloped rural land that is painted some shade of green (not salmon color) in other parts of Central, North and South Kitsap County.

Regarding "growth projections," Staff has already agreed in their response to Criteria A.2 that there is sufficient projected population capacity to support the proposed Amendment / Rezone.

Staff's analysis and conclusions are without merit and not correct.

D.1.d – The proposed amendment does not materially affect the land uses and growth projections which are the basis for comprehensive planning, and reflects local circumstances in the County –

See above comments regarding Goal 8 & 11 and those supplemented by the discussion in D.1.c. Staff indicates while the current Comprehensive Plan (December, 2012) does not include the site in Bremerton's UGA, both Alternatives 2 and 3 do have this site in Bremerton's UGA. Note too, that in the "Proposed Zoning" graphic included with the Staff report that similarly platted property to the west of the subject property is shown as Urban Low, not URS. While this is an appropriate proposal, it goes beyond FSN, Inc.'s request. And the applicant has no objection to a larger rezone effort if so sponsored by Kitsap County.

Staff assessment and conclusions are that in DSEIS alternative proposals 2 & 3 there is compliance with this criteria.

D.1.e – the proposed amendment does not materially affect the adequacy or availability of urban facilities and services to the immediate area or the overall areas of the urban growth area –

Staff in their discussion of Criteria D.1.a that there are no significant adverse impacts on adopted levels of service standards or other public facilities and level of service standards for other public facilities and services. However in their comments regarding this Criteria D.1.e, Staff states, "The County would have to extend and provide sewer services to development in this area." And, "The site has not been specifically planned for sewer service by the County or City; sewer service was addressed broadly in 2006 in the evaluation of UGAs but specific sewer capital plans were not prepared for this site."

Staff response essentially agrees with the discussion presented by the applicant, i.e. there is compliance with this criteria.

D.1.e – The proposed amendment is consistent with the GMA, Kitsap County-wide Planning Policy, state and local laws and other applicable inter-jurisdictional policies or agreements –

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cont.

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78-16

78-17

Growth Management Act Planning Goals (RCW 36.70A.020)

Please note these goals are those that Kitsap County has to meet when their plan is adopted. These goals have already been satisfied when the County defined Urban Growth Areas in 1998, 2006, and as they were revised in 2012. The subject property lies adjacent to Bremerton’s UGA on two sides. Because the applicant’s property meets the definition of an urban area, its exclusion seems to have been an arbitrary choice by the County’s planners in those eras.

78-17
cont.

1) Urban Growth. Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.

Staff’s assessment focuses on the undeveloped character of the site and the fact that sewer service has not been extended to the site. Staff did not discuss the prior platting activity. Also not discussed is the fact that while the subject property is in Bremerton’s UGA, it is not the City of Bremerton that has been and will be providing sewer service to this area. Kitsap County is the agency that maintains the roads including Kent Avenue West from which eight of the applicant’s lots take access and provides sewer service.

78-18

Based on the findings of Staff in their discussion of Criteria D.1.a, service capacity of Kitsap County sewer system in this area indicates “adequate capacity to serve the site.” Because public water is available to the site (though not currently connected) and that the connection to sewer is less than 200 feet away, the latter can be provided in an efficient manner. It may be noted too, that the Kitsap / Bremerton Health Department has a policy that property within 200 feet of a sewer main is supposed to connect to the sewer. This policy, although long standing is seldom enforced.

Staff assessment is inconclusive with respect to compliance with this goal, but when all factors are considered, there is goal compliance.

2) Reduce sprawl. Reduce the inappropriate conversion of undeveloped land into sprawling, low density development.

Staff assessment leads to the conclusion that there is compliance with this goal.

Kitsap County-wide Planning Policies –

Please note the applicant’s objection to the County-wide Planning Policies (CPPs) being part of analysis criteria as explained on Pages 3 & 4 of the applicant’s response to the Supplemental Comprehensive Plan Amendment Criteria. Also to be referenced here is the e-mail transmitted to Katrina Knutson and Dave Greetham on November 17, 2015 providing further discussion of why the CPPs should not be used to evaluate Site Specific Comprehensive Plan Amendment? Rezone proposals. If Staff continues to refer to these policies as set forth in their staff report

78-19

for evaluative criteria and they can subsequently defend the use of those policies as discussed in the November 17, 2015 mentioned above, **the applicant reserves the right to address** the Staff's compliance assessment either as contained in the November 9th staff report or as detailed in a response to that November 17th e-mail from W.M. PALMER CONSULTANTS.

Also note that County-wide Planning Policies (CPPs) are only to be employed as comprehensive plan framework criteria to judge that the County and the Cities have coordinated plans. Each of those jurisdictions have separately adopted CPPs, but none so far have tried to include them or portions of them in their respective comprehensive plans. **And that is a good thing** since the **so-called policies are mostly not policies at all**, they are written to be regulations with mandates like shall and must in the verbiage, but not codified as an ordinance. Just in the 2010-2011 amendments there are 118 instances when this has occurred. Many other so-called policy statements are laughable examples of meaningless platitudes.

Note here the Staff returns to the assessment criteria as found in the application criteria.

2.a. Demonstration from the jurisdiction affiliated with the UGA that the proposal has the capability and capacity to provide urban level services to the area.

Staff references the July 16, 2015 letter from the City of Bremerton, which states that the City has "...sufficient land capacity within our city and **assigned** UGAs, to satisfy the target populations for the next 20 years, which are approximately 18,000 people." (Emphasis added) On the surface it might appear that this criteria is not satisfied. However, there are several factors that mitigate in favor of compliance with this criteria:

- 1.) It is not the City of Bremerton who actually serves this area with any other utility than water. Kitsap County provides road maintenance, sewer service and police protection. Supposedly the only "public service" not available to the site is sewer. Since Bremerton does not supply that now and would not provide it regardless of whether their UGA is expanded or not, the real issue is whether the City might choose to annex all or portions of the Replat of Port Orchard City. Recall the earlier discussions about capacity of the County to provide sewer service.....the capacity exists. The City of Bremerton as observed above already supplies water to the area. Therefore "capability" and "capacity" is not an issue.
- 2.) Since the property is already platted at urban densities and because there is access to public water, power / phone and public streets, the applicant could with a little creativity build houses on all of their 15 lots. Even if only 10 of the 15 were developed the actual character of the development would be "urban." Whether 10 or 15 lots supported houses there would be 25 – 40 new people living in Block 3 of the Replat of Port Orchard City. And if the Applicant's Site Specific Comprehensive Plan Amendment / Rezone application were to be denied, the applicant would have to pursue other options. In the final analysis, Bremerton vis-à-vis the County may have stopped short of extending sewer, but the population of this area would increase none-the-less.
- 3.) Bremerton's comments as recorded in their July 15th letter indicate they were "**assigned**" an amount of land capacity for their projected 18,000 people. Not noted is

78-19
Cont.

78-20

who made the assignment and whether the assignment was based on a mathematical equation or desires of the people of Bremerton or those within their UGAs. Likely it is the former, because GMA is all about control and not really about true comprehensive planning reflecting the desires of the people to create an environment they actually want to live in both now and in the future. The comment here is directed at the apparent “constraint” the City of Bremerton is under limit their population intake and therefore the land area that might one day comprise their City.

- 4.) As a follow-on to Point 2, if the applicant succeeds in adding 10 to 15 homes on their property without sewer and there is a population growth of 25 – 40 new people (about .002 of a percent of the 18,000 and an even smaller percentage of Bremerton’s existing UGA), where is this population credited?” Remember URS land is not rural (by definition) even though it may be outside a UGA. The answer to this question is.....one way or another it would be credited to the City of Bremerton’s UGA population. And whether it is or not will not matter to the applicant or the people who will one day occupy those 10 - 15 homes.
- 5.) In this instance a judgement that there is not a “technical compliance” with this criteria is nothing more than an academic exercise or better described as a “game” the County and the City have to play that is neither based on what should work in real life nor the end result. This is a good example of why GMA planning is about “control” and not about real Comprehensive Planning that Kitsap County and the Cities could do before 1990 and 1991.

78-20
Cont.

Staff assessment may be technically correct, but a more thorough analysis of the proposed Amendment / Rezone in light of realistic factors pertinent to this property leads to a different conclusion.

2.b. Demonstration that the proposal is consistent with the associated urban growth area jurisdiction’s Comprehensive plan –

Staff asserts that “the City of Bremerton has more residential capacity than its projected 2025 and 2036 population growth.” And, “The City already has sufficient capacity (See attached letter). This statement seems to conflict to what the Staff reported in their assessment of Criteria A.2 wherein they said: “the assumptions upon which the Comprehensive Plan is based are still generally valid.” And that “there is sufficient projected population capacity to support the proposed Amendment / Rezone.”

78-21

The question asked in the Criteria is not the question answered by Staff. The Staff’s answer should have been, the existing UGA in this area has property that is Zoned Urban Medium and Urban Low and that the lots in those two zones are almost identical in size to the lots in the applicant’s holdings. Therefore, the answer to this question is yes. If Staff had elaborated they might have gone on to talk about the source of the water system that serves the site or that property on the east side of Kent Avenue West is served by public sewer from Kitsap County and that it is Kitsap County that is responsible for road maintenance (not the City of Bremerton)

in this area as well as police protection. The City already provides fire service, because it has the closest facilities.

78-21

Staff assessment and conclusions not applicable because they provided an answer to a question the Criteria did in ask.

3.c - Demonstration that the proposal meets the affiliated jurisdiction's transportation standards –

Staff says this criteria will be addressed cumulatively in Alternatives 2 and 3 in the Draft SEIS. And that results are pending.

While this response does not really answer the question posed by this criteria, when that "cumulative" analysis is made of Alternatives 2 & 3, the conclusion with respect to the larger area, i.e. the Replat of Port Orchard City in which the applicant's property is a part, is that Kitsap County has not maintained the streets to the same standards utilized by the City of Bremerton.

78-22

Beyond that notation, when vacant property is eventually developed, assuming it lies within Bremerton's UGA (but is not annexed), the street improvements will have to meet Kitsap County's transportation standards not the City's. Since there is no Urban Growth Area Management Agreement (UGAMA) between the two jurisdictions, further development of Kent Avenue West and West Davis Street will be developed to County Standards. In reality, the standards of the two jurisdictions are quite similar.

This criteria has been satisfied.

Based on the analysis and conclusions Staff has presented, which have been refuted, this response and the original application material, demonstrates the FSN, Inc. proposed URS to UL Site Specific Comprehensive Plan Amendment / Rezone has met the criteria for approval.

78-23

Please allow the applicant to reply to any further Staff analysis and/or conclusions drawn, prior to submittal of document to the Planning Commission for Public Hearing. Also, clarification is needed to determine whether the comments contained in this letter are to be included in the response to the Draft Supplemental EIS, before the Final Supplemental EIS is published.

Thank you for the opportunity to respond to the Staff Report.

Sincerely,



William M. Palmer

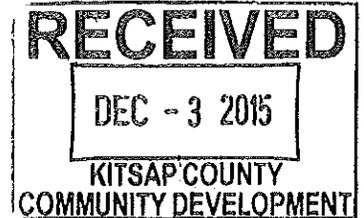
W.M. PALMER CONSULTANTS

cc. FSN, Inc. (Curtis & Avery)



Letter 79

Permit Number: 15 00697



DATE: December 4, 2015

TO: Katrina Knutson, AICP, Senior Planner, DCD
Jeff Arango, AICP, Senior Associate, BERK Consulting
Kitsap County Planning Commission;
Kitsap County Planning Commission

RE: Bair Reclassification Request

APPLICATION INFORMATION

1. Applicant Name: Chuck Bair (applicant and owner); (William Palmer (authorized agent/representative)
2. Parcel Number: 082401-3-068-2002
3. Address: 2270 Hilltop Lane NW, Bremerton, WA 98312
4. Current Land Use: Land with garage used for auto repair
5. Current Comprehensive Plan Map Designation: Rural Residential
6. Proposed Comprehensive Plan Map Designation: Rural Industrial
7. Current Zoning: Rural Residential (RR)
8. Proposed Zoning: Rural Industrial (RI)
9. Lot Area/Size: 0.73 acres



Why does Kitsap County have a zoning designation of Rural Industrial (RI) when the only permitted use, accessory use or structure, is the same as that of Rural Residential (RR)? All the other uses including outside RV Storage is a C= Conditional use permit. Why is the zoning so restrictive and expensive? Why don't we have more Rural Industrial zoned land?

79-1

The Consultant, Mr. Jeff Arango states on page 6 in 3 A .2.1 C. Rural Lands" the subject property is not suitable for the proposed land use designation, even though there is a commercial use adjacent to the property to the south it is a Non-Conforming use and will likely be phased out over time." I sincerely doubt that Mr. & Mrs. Dana Pieze, owners of Dana's Heating & Cooling are aware of such outrageous thoughts at the DCD after having not long ago purchased their .9 acres for \$370,000. I purchased my property at .73 acres for \$75,000, perhaps the DCD Staff, the Planning Commission and the Kitsap County Commissioners will understand the economics of the disparity. My property for years had a "Non-Conforming use" then the property sat abandoned and in despair so the DCD took away the Non-conforming use designation lowering the use and the value. The highest and best use of my property is yet to be determined, however, as an entrepreneur I am trying to satisfy

79-2

a demand for RV parking /storage. We have more baby boomers, more retirees, they purchase RV's with the hopes of traveling this great country. Some realize that they cannot park them at their homes albeit HOA's or limited land. They want them convenient, close to their homes and secure. They only use them a couple times per year so the RV sits most of the time, creating very little in and out traffic impact. The property is already completely fenced from the previous non-conforming use, so the rural residential neighborhood which is behind and off Chico Way would not be adversely impacted. There would not be any employment growth at the proposed site as it would be managed and secured with technology. This amendment request does support an existing commercial or industrial node in the community. My neighbor, Dana's Heating & Cooling is a generational business likely to remain operational at this site well beyond our lifetimes. My property is a natural addition to their existing commercial or industrial node. The previous owner of both parcels, Trident Marine tried to operate their government and services business on both parcels because they required the space. However, DCD refused to allow them to make use of my parcel. Therefore, they got fed up and relocated. Businesses do not like being forced into monopolies like County placed existing industrial areas.

79-2
Cont.

Yes, I along with Kitsap County, the City of Bremerton and the Local School District would benefit from this proposed amendment. My customers have demanded additional

79-3

convenient space for their recreational vehicles and boats and if we are fortunate enough to accommodate our clients with this location, like Kitsap Lake Storage , it will be a wonderful asset for our family and Kitsap County .

79-3
Cont.

Respectfully,

A handwritten signature in black ink, appearing to be "Chuck & Patty Bair", written in a cursive style.

Chuck & Patty Bair



December 4, 2015

Katrina Knutson, ACIP
Jeff Arango, ACIP, Senior Associate, BERK Consulting
Department of Community Development
614 Division Street, MS - 38
Port Orchard, Washington 98366

SUBJECT: Response To Staff Report For Schourup, LLC's UM to Urban Industrial Site Specific Comprehensive Plan Amendment / Rezone – Permit No: 15 00739

Dear Katrina, Jeff,

This letter is a response to the Staff Report issued on November 9, 2015 analyzing the Schourup, LLC's Site Specific Comprehensive Plan Amendment / Rezone proposal to reclassify and rezone Mr. Schourup's property on Ida Street West and Werner Road West in the West Bremerton area. The subject property is further referenced by Kitsap County Assessor / Tax Numbers – 04527-002-013-0006, 04527-002-016-0003 & 04527-002-017-0002.

It is noted that the staff report contains no specific recommendation. There are none-the-less implied recommendations or conclusions. Many of the comments made by staff seem to ignore the applicant's responses to the same questions. That begs the question as to how the two documents, i.e. the applicant's responses verses the staff's analysis is to be presented to the Planning Commission and ultimately to the Board of County Commissioners? Also it should be noted that the format of criteria questions addressed by staff is problematic and therefore confusing as there are criteria questions not posed in the application material and there is a different order of criteria assessments not found in the Supplement Site Specific Comprehensive Plan Criteria.

80-1

Since the staff report assessment of Mr. Schourup's Plan Amendment / Rezone request leads to the conclusion the proposed Comprehensive Plan Amendment satisfies the criteria for approval, the applicants response comments herein are to provide clarifications not found in the staff report or to question the meaning of statements made:

Background –

The staff report mentions that the parcel, "has moderate geological hazards, and one of the parcels shows hydric soils indicating a small area of potential wetlands in the northeast corner."

Also mentioned is: "The property to the east has identified, surveyed wetlands." With respect to these issues, it is well to note that the graveled parking lot, previous site filling activity, concrete retaining wall and installed storm water control system were all facilities or activities that took place on the site after permit approval had been obtained from Kitsap County prior to or in conjunction with the improvements to the site allowing the creation of that parking lot. Also considered at the time of project approval were the potential and mapped wetland areas cited by staff. Even though the site appears undeveloped it is better characterized as a developed site with a use that was conditionally approved.

80-2

While it is true the site is Zoned Urban Medium, the surrounding uses to the west and north are industrial within the City Limits of Bremerton.

Surrounding Zoning and Land Use –

The "Exhibit 1" chart found on Page 2 is not accurate and not consistent with the information presented by the applicant. The current land use on the west and north of the subject property is **not** Government and Services. It is in fact an industrial use and has been for a very long time, even predating GMA planning activity. Apparently Staff has chosen to characterize developed property with large industrial buildings as uniformly "Government and Services" without looking to see if the land is properly categorized as "public" and owned or controlled by some governmental agency.

80-3

EVALUATION –

General Criteria (KCC 21.08.070.A)

These General Criteria questions were not part of the application material the applicant was required to address or at least not as worded and presented in the staff report

A.3 – How the requested re-designation is in the public interest and the proposal is consistent with the Kitsap County Comprehensive Plan -

Staff says that the County "aims to focus a greater share of growth into the urban areas, which may include rezoning properties within the existing UGA boundary to increase capacity as necessary to accommodate growth targets." And the Staff goes on to say that, "**It may not be in the County's interest to approve the amendment** if additional employment capacity is added by virtue of approving this request." (Emphasis added)

80-4

This is a pretty incredible statement that is not clarified by reference to Criteria D.1.b. The issue is not really whether Bremerton needs additional employment, but whether it would benefit the County. The answer is a clear **yes it would!** Kitsap County and all other counties in the State of Washington should have been up in arms about the requirements of GMA, because anybody who could read tea leaves, would have to come to the conclusion that GMA planning

would ultimately undercut the tax base of Counties. This is an example of how that can occur on an incremental basis and there are a lot of others right here in Kitsap County.

80-4
cont.

Based on the analysis and conclusions Staff has presented, the clarifying comments of this response and the original application material, demonstrates the Schourup, LLC proposed Urban Industrial Site Specific Comprehensive Plan Amendment / Rezone has met the criteria for approval.

80-5

Please allow the applicant to reply to any further Staff analysis and/or conclusions drawn, prior to submittal of document to the Planning Commission for Public Hearing. Also, clarification is needed to determine whether the comments contained in this letter are to be included in the response to the Draft Supplemental EIS, before the Final Supplemental EIS is published.

Thank you for the opportunity to respond to the Staff Report.

Sincerely,



William M. Palmer
W.M. PALMER CONSULTANTS

cc. Bill Schourup



December 4, 2015

Katrina Knutson, ACIP
Jeff Arango, ACIP, Senior Associate, BERK Consulting
Department of Community Development
614 Division Street, MS - 38
Port Orchard, Washington 98366

SUBJECT: Response To Staff Report For Edwards Rural Residential to Urban Low Site Specific
Comprehensive Plan Amendment / Rezone – Permit No: 15 00737

Dear Katrina, Jeff,

This letter is a response to the Staff Report issued on November 9, 2015 analyzing the Laurier Enterprises, Inc. Site Specific Comprehensive Plan Amendment / Rezone proposal to reclassify and rezone their property to Urban Low on Silverdale Way NW. The subject property is further referenced by Kitsap County Assessor / Tax Numbers – 032501-2-018-2009 & 032501-2-022-2003.

It is noted that the staff report contains no specific recommendation. There are none-the-less implied recommendations or conclusions. Many of the comments made by staff seem to ignore the applicant's responses to the same questions. That begs the question as to how the two documents, i.e. the applicant's responses verses the staff's analysis is to be presented to the Planning Commission and ultimately to the Board of County Commissioners? Also it should be noted that the format of criteria questions addressed by staff is problematic and therefore confusing as there are criteria questions not posed in the application material and there is a different order of criteria assessments not found in the Supplement Site Specific Comprehensive Plan Criteria.

Since the staff report assessment of the Edwards Plan Amendment / Rezone request leads to the conclusion the proposed Comprehensive Plan Amendment satisfies the criteria for approval, at least under Alternative 3 as addressed in the DSEIS. The applicant's response comments herein are to provide clarifications not found in the staff report or to question the meaning of statements made:

81-1

Background –

The Staff assessment mentions “the presence of wetlands along the eastern property edge, north of Silverdale Way.” It should further be noted that the County’s mapping of this feature is not precise and it may or may not extend into the Edwards property. The County’s building limitations mapping indicates no other possible environmental development constraint. The reference to the Category 1 critical aquifer recharge area, may or may not have significance in the context of the subject site and the other property in the immediate vicinity, which has been subdivided in to small, urban density lots.

81-2

Surrounding Zoning and Land Use –

The “Attachment 3 – Current Land Use Map” found on Page 12 is somewhat misleading in how it characterizes **dedicated open space** within subdivided property west and south of the site and in the subdivision north of NW Mountain View Road. True it is “undeveloped land,” but it is not the same as the Edwards or other sites in the vicinity that are better characterized as vacant land.

81-3

EVALUATION –**Reclassification Request Criteria (KCC 21.08.070.D)**

D.1.a – The proposed amendment meets concurrency requirements for transportation, sewer and water, and will not result in significant adverse impacts on adopted level of service standards for other public facilities and services, such as police, fire and emergency medical services, park services and general governmental services -

Staff says when discussing density options under an Urban Low Zoning in the second paragraph that “.....104 lots is a maximum unconstrained estimate; the number would likely be lower when factoring in critical areas and site design.”

81-4

That statement might be true if there were evidence of “critical areas” to be found on the site. Even if there are and the evidence is lacking “clustered housing” such as is possible with a Performance Based Development (PBD) design could offset in density allowance any loss of dwelling units that might result from the need to dedicate street right-of-way, storm drainage facilities, perimeter buffer allocations or possible critical area conditions that might be uncovered on the site.

Regarding the discussion of Criteria D.1.c. found on Page 7 of the Staff Report

D.1.c – The subject parcel(s) is suitable for the requested land use designation based upon, but not limited to, access, provision of utilities, consistency with existing and planned uses, environmental constraints and compatibility with the neighborhood –

81-5

The last sentence of the Staff's assessment is misleading. *"The mapped wetland along the easterly edge would impact future development in that immediate location, but would not impact the majority of the property."* As the added text in the Background discussion indicates the so-called mapped wetland, shows up on County maps because of the presence of soils with hydric characteristics. That soil condition may or may not be associated with the other two components that are necessary to have a wetland – wetland vegetation and hydrology. The best that can be reported is that the property to the east has a potential wetland component and the extent of such possible wetland, might extend into the Edwards' property.

81-5
cont.

Also, if there is indeed a wetland on the neighbor's property the category of it is important to determine what extent the required buffer might impact the Edward's property.

Regarding County-wide Planning Policies –

Please note the applicant's objection to the County-wide Planning Policies (CPPs) being part of analysis criteria as explained on Pages 3 & 4 of the applicant's response to the Supplemental Comprehensive Plan Amendment Criteria. Also to be referenced here is the e-mail transmitted to Katrina Knutson and Dave Greetham on November 17, 2015 providing further discussion of why the CPPs should not be used to evaluate Site Specific Comprehensive Plan Amendment? Rezone proposals. If Staff continues to refer to these policies as set forth in their staff report for evaluative criteria and they can subsequently defend the use of those policies as discussed in the November 17, 2015 mentioned above, **the applicant reserves the right to address** the Staff's compliance assessment either as contained in the November 9th staff report or as detailed in a response to that November 17th e-mail from W.M. PALMER CONSULTANTS.

81-6

Also note that County-wide Planning Policies (CPPs) are only to be employed as comprehensive plan framework criteria to judge that the County and the Cities have coordinated plans. Each of those jurisdictions have separately adopted CPPs, but none so far have tried to include them or portions of them in their respective comprehensive plans. **And that is a good thing** since the **so-called policies are mostly not policies at all**, they are written to be regulations with mandates like shall and must in the verbiage, but not codified as an ordinance. Just in the 2010-2011 amendments there are 118 instances when this has occurred. Many other so-called policy statements are laughable examples of meaningless platitudes.

81-7

Based on the analysis and conclusions Staff has presented, the clarifying comments of this response and the original application material, demonstrates the Edwards proposed Urban Low Site Specific Comprehensive Plan Amendment / Rezone has met the criteria for approval in the Context of the Draft Supplemental EIS Alternative 3 Plan proposal.

81-8

Please allow the applicant to reply to any further Staff analysis and/or conclusions drawn, prior to submittal of document to the Planning Commission for Public Hearing. Also, clarification is needed to determine whether the comments contained in this letter are to be included in the response to the Draft Supplemental EIS, before the Final Supplemental EIS is published.

Thank you for the opportunity to respond to the Staff Report.

Sincerely,

A handwritten signature in blue ink that reads "William M. Palmer". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

William M. Palmer
W.M. PALMER CONSULTANTS

cc. Rhonda Edwards, Mountain View Meadows



December 4, 2015

Katrina Knutson, ACIP
Jeff Arango, ACIP, Senior Associate, BERK Consulting
Department of Community Development
614 Division Street, MS - 38
Port Orchard, Washington 98366

SUBJECT: Response To Staff Report For Fox – Harbor Rental’s Site Specific Comprehensive Plan Amendment – Rural Protection to Rural Residential - Permit No: 15 00738

Dear Katrina, Jeff,

This letter is a response to the Staff Report issued on November 9, 2015 analyzing the Fox – Harbor Rental’s Site Specific Comprehensive Plan Amendment / Rezone proposal to reclassify and rezone his property on Garfield Avenue SE in the East South Kitsap County area. This parcel is further referenced by the above Kitsap County Assessor / Tax Number 332402-1-005-2000.

It is noted that the staff report contains no specific recommendation. There are none-the-less implied recommendations or conclusions. Many of the comments made by staff seem to ignore the applicant’s responses to the same questions. That begs the question as to how the two documents, i.e. the applicant’s responses verses the staff’s analysis is to be presented to the Planning Commission and ultimately to the Board of County Commissioners? Because that is unclear and because the staff analysis contains unsupported opinion and some inaccuracies it is necessary to object to much of what is in the staff report – particularly in the response to evaluation criteria. Also the format of criteria questions addressed by staff is problematic and therefore confusing as there are criteria questions not posed in the application material and there is a different order of criteria assessments not found in the Supplemental Site Specific Comprehensive Plan Criteria.

82-1

Herein are the applicant’s objections to the staff analysis and comments as contained in the staff report:

Background –

The staff report recounts that the site has some environmental conditions that pose potential building limitations. Not mentioned in this context is the fact that portions of the site have no such apparent limitations. Also not discussed is the relevance of this feature to the proposed

82-2

Site Specific Comprehensive Plan Amendment/Rezone proposal or that other property west and north of the site has a greater extent of these potential building limitations than does the Fox-Harbor Rentals site. These are the areas Zoned Rural Residential.

Staff's mention of this environmental features requires more context, especially noting that there is public water available to the site.

82-2
cont.

Surrounding Zoning and Land Use:

It is important to note that parcels abutting the site are considerably smaller than what is proposed by the applicant. Public Water service is a distinguishing factor more than the road in this instance for what is appropriately Zoned Rural Residential than Rural Protection. Rural Protection areas county-wide seldom have a public supply of water available to those lands.

82-3

EVALUATION –

General Criteria (KCC 21.08.070.A)

These General Criteria questions were not part of the application material the applicant was required to address or at least not as worded and presented in the staff report. See also the comments recorded on Page 5 of this response regarding the Reclassification Request Criteria (KCC 21.08.070.D).

The objections addressed herein and in subsequent discussions regarding criteria compliance, reflect some of the answers to these questions as posed in the application material.

82-4

A.1. How circumstances related to proposed amendment and/or the area in which the property affected by the proposed amendment is located have changed since the adoption of the Comprehensive Plan or applicable development regulations –

While the Staff says there are no changed conditions, that statement presumes several things that are not true:

1. The County in all previous planning exercises examined each and every individual parcel for its potential inclusion in one plan category or another;
2. That the County's opinion is superior to that of the landowner and that it knows what is best for an area;
3. That the "broad brush" with which the County paints properties green (or whatever color) includes a comprehensive understanding of local environments.

In this instance a "broad brush" was used to paint lands Rural Wooded that in this area are mostly public lands. The precedent for how property is used for residential purposes in this area is Rural Residential in character and not Rural Protection – especially for property that has substantial frontage on a collector arterial. The applicant has addressed the changed conditions and the above factors are relevant.

Staff's conclusion on this point is not accurate, the applicant still contends the criteria is satisfied.

82-5

A.2. How the assumptions upon which the 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 -
Staff says “the assumptions upon which the Comprehensive Plan is based are still generally valid.” But not addressed is the impact of four (4) lots and a potential of 10 people would do to the County’s overall population projects for the next 20 years.
Staff’s assessment is not complete. The applicant still contends the criteria is satisfied.

82-6

A.3 – How the requested re-designation is in the public interest and the proposal is consistent with the Kitsap County Comprehensive Plan -

Staff says that “the County aims to focus a greater share of growth into urban areas.” And that “the application is not consistent with this aim.” Clearly the argument is “hog wash.” This is not a rezone request to change the balance of urban versus rural land. Also, the Staff has not defined what “public interest” has to do with this application. When one rules out, public health and safety, neither of which are manifest issues in the proposed Amendment / Rezone request, that leaves only welfare to be considered as a potential “public interest” topic. If a serious analysis is made of “welfare” with to either the general area in which the subject property is found or in what development options of the property may be, more data would have to be provided.

82-7

Since the Staff has not defined what constitutes “public interest” and based on what Staff says about Comprehensive Plan compliance, the Staff’s comments are inconclusive. The applicant still contends the criteria is satisfied.

Reclassification Request Criteria (KCC 21.08.070.D)

D.1.a – The proposed amendment meets concurrency requirements for transportation, sewer and water, and will not result in significant adverse impacts on adopted level of service standards for other public facilities and services, such as police, fire and emergency medical services, park services and general governmental services -

Staff’s discussion centers on small incremental changes in site density that may equate to small incremental demands for services. This is not an urban environment and one issue often overlooked in the public sector is that inhabitants of these areas do not have the same level of reliance on public services that those in urban areas do.

82-8

Staff’s assessment is inconclusive. The applicant still contends the criteria is satisfied.

D.1.b – the proposed amendment is consistent with the balance of the goals, policies and objectives of the current Kitsap County Comprehensive Plan and reflects the local circumstances of the County –

The Staff assessment of this issue indicates the small (miniscule really) incremental increase in population would diminish the amount of people going into urban areas. While technically true this is a ridiculous postulation that ignores among other considerations all of the non-

82-9

conforming lots found in rural areas that could be developed –even at urban densities such as in the South Kitsap Area of Manchester and Woods Road.

82-9
cont.

The Staff’s analysis and conclusions are in general are inconclusive. The applicant still contends the criteria is satisfied.

Kitsap County Comprehensive Plan Goals and Policies

Section 2.2 Urban Growth Areas of the Land Use Element of the 2012 Adopted plan –

Staff cites the 3A.2.1 Rural Lands section of the Land Use Element of the Comprehensive Plan and lays out Goal 1, Policy RL-1, RL-2 and RL-3.

82-10

Staff says that the proposed Amendment / Rezone would retain the rural character of the County, but at a slightly higher density than allowed by Rural Protection.

Staff comments are in general agreement that the proposal satisfies this goal but inconclusive with respect to preservation of land for timber production.

Growth Management Act Planning Goals (RCW 36.70A.020)

Staff references Goals 1), 2) 8), 9) and 10) and that the proposed Amendment / Rezone is not supported by these Goals because there would be pressure to convert other Rural Wooded properties to Rural Residential use. **The argument fails because of the public ownership patterns in the area as earlier noted.**

82-11

D.1.c – The subject parcel(s) is suitable for the requested land use designation based upon, but not limited to, access, provision of utilities, consistency with existing and planned uses, environmental constraints and compatibility with the neighborhood –

82-12

See above comments about GMA goals and policies and comments in D.1.b.

Staff’s analysis and conclusions are without merit and not correct.

D.1.d – The proposed amendment does not materially affect the land uses and growth projections which are the basis for comprehensive planning, and reflects local circumstances in the County –

82-13

See above comments regarding Comprehensive Plan Compliance and that for D.1.b.

Staff assessment and applicant’s analysis are at variance with the applicant’s analysis.

Kitsap County-wide Planning Policies –

Please note the applicant’s objection to the County-wide Planning Policies (CPPs) being part of analysis criteria as explained on Pages 3 & 4 of the applicant’s response to the Supplemental Comprehensive Plan Amendment Criteria. Also to be referenced here is the e-mail transmitted to Katrina Knutson and Dave Greetham on November 17, 2015 providing further discussion of why the CPPs should not be used to evaluate Site Specific Comprehensive Plan Amendment? Rezone proposals. If Staff continues to refer to these policies as set forth in their staff report for evaluative criteria and they can subsequently defend the use of those policies as discussed in the November 17, 2015 mentioned above, **the applicant reserves the right to address the**

82-14

Staff's compliance assessment either as contained in the November 9th staff report or as detailed in a response to that November 17th e-mail from W.M. PALMER CONSULTANTS.

82-14
cont.

Also note that County-wide Planning Policies (CPPs) are only to be employed as comprehensive plan framework criteria to judge that the County and the Cities have coordinated plans. Each of those jurisdictions have separately adopted CPPs, but none so far have tried to include them or portions of them in their respective comprehensive plans. **And that is a good thing** since the **so-called policies are mostly not policies at all**, they are written to be regulations with mandates like shall and must in the verbiage, but not codified as an ordinance. Just in the 2010-2011 amendments there are 118 instances when this has occurred. Many other so-called policy statements are laughable examples of meaningless platitudes.

82-15

Note here the Staff returns to the assessment criteria as found in the application criteria.

Criteria 4a and 4b

Were addressed by the applicant and judged to be satisfied with the applicant's proposed Amendment / Rezone.

82-16

Based on the analysis and conclusions Staff has presented, which have been refuted, this response and the original application material, demonstrates the Fox – Harbor Rentals proposed RP to RR Site Specific Comprehensive Plan Amendment / Rezone has met the criteria for approval.

82-17

Please allow the applicant to reply to any further Staff analysis and/or conclusions drawn, prior to submittal of document to the Planning Commission for Public Hearing. Also, clarification is needed to determine whether the comments contained in this letter are to be included in the response to the Draft Supplemental EIS, before the Final Supplemental EIS is published.

Thank you for the opportunity to respond to the Staff Report.

Sincerely,

William M. Palmer
W.M. PALMER CONSULTANTS

cc. Harbor Rentals



December 4, 2015

Katrina Knutson, ACIP
Jeff Arango, ACIP, Senior Associate, BERK Consulting
Department of Community Development
614 Division Street, MS - 38
Port Orchard, Washington 98366

SUBJECT: Response To Staff Report For Laurier Enterprises, Inc. UL to HTC Site Specific
Comprehensive Plan Amendment / Rezone – Permit No: 15 00740

Dear Katrina, Jeff,

This letter is a response to the Staff Report issued on November 9, 2015 analyzing the Laurier Enterprises, Inc. Site Specific Comprehensive Plan Amendment / Rezone proposal to reclassify and rezone their property HTC Commercial on Warner Avenue SE in the East Port Orchard UGA. The subject property is further referenced by Kitsap County Assessor / Tax Number –302402-4-044-2000.

It is noted that the staff report contains no specific recommendation. There are none-the-less implied recommendations or conclusions. Many of the comments made by staff seem to ignore the applicant's responses to the same questions. That begs the question as to how the two documents, i.e. the applicant's responses verses the staff's analysis is to be presented to the Planning Commission and ultimately to the Board of County Commissioners? Also it should be noted that the format of criteria questions addressed by staff is problematic and therefore confusing as there are criteria questions not posed in the application material and there is a different order of criteria assessments not found in the Supplement Site Specific Comprehensive Plan Criteria.

83-1

Since the staff report assessment of Laurier Enterprises, Inc.'s Plan Amendment / Rezone request leads to the conclusion the proposed Comprehensive Plan Amendment satisfies the criteria for approval, the applicants response comments herein are to provide clarifications not found in the staff report or to question the meaning of statements made:

83-2

Background –

The Staff assessment mentions only the context of existing zoning and that the land is undeveloped. What would have been appropriate to indicate is that the applicant's motive for

83-3

seeking the proposed Amendment / Rezone is that he can solve an existing long standing problem with storm water and provide additional parking area to support his plans to remodel and expand his McDonalds Restaurant. The expansion is to take place on the existing zoned property. This objective was documented in the application material.

83-3
cont.

Surrounding Zoning and Land Use –

The “Exhibit 1” chart found on Page 2 is not accurate and not consistent with the information presented by the applicant. The current land use on the west is a restaurant and it is HTC commercially Zoned. Areas to the south across SE Mile Hill Drive have commercial uses on them that can be characterized as “trade” but definitely **not** Government and Services. And these commercial uses have been for a very long time, even predating GMA planning activity. Apparently Staff has chosen to characterize developed property with large buildings as uniformly “Government and Services” without looking to see if the land is properly categorized as “public” and owned or controlled by some governmental agency.

83-4

EVALUATION –

Based on the analysis and conclusions Staff has presented, the clarifying comments of this response and the original application material, demonstrates the Laurier Enterprises, Inc. proposed Highway Tourist Commercial Site Specific Comprehensive Plan Amendment / Rezone has met the criteria for approval.

83-5

Please allow the applicant to reply to any further Staff analysis and/or conclusions drawn, prior to submittal of document to the Planning Commission for Public Hearing. Also, clarification is needed to determine whether the comments contained in this letter are to be included in the response to the Draft Supplemental EIS, before the Final Supplemental EIS is published.

83-6

Thank you for the opportunity to respond to the Staff Report.

Sincerely,



William M. Palmer
W.M. PALMER CONSULTANTS

cc. Laurier Enterprises, Inc.



December 4, 2015

Katrina Knutson, ACIP
Jeff Arango, ACIP, Senior Associate, BERK Consulting
Department of Community Development
614 Division Street, MS - 38
Port Orchard, Washington 98366

SUBJECT: Response To Staff Report For Tallman’s Site Specific Comprehensive
Plan Amendment – Rural Wooded to Rural Residential - Permit No: 15 00742

Dear Katrina, Jeff,

This letter is a response to the Staff Report issued on November 9, 2015 analyzing the Tallman Site Specific Comprehensive Plan Amendment / Rezone proposal to reclassify and rezone his property on NW Holly Road in the Wildcat Lake area of Central Kitsap County, Washington. This parcel is further referenced by the above Kitsap County Assessor / Tax Number 032401-3-023-1003.

It is noted that the staff report contains no specific recommendation. There are none-the-less implied recommendations or conclusions. Many of the comments made by staff seem to ignore the applicant’s responses to the same questions. That begs the question as to how the two documents, i.e. the applicant’s responses verses the staff’s analysis is to be presented to the Planning Commission and ultimately to the Board of County Commissioners? Because that is unclear and because the staff analysis contains unsupported opinion and some inaccuracies it is necessary to object to much of what is in the staff report – particularly in the response to evaluation criteria. Also the format of criteria questions addressed by staff is problematic and therefore confusing as there are criteria questions not posed in the application material and there is a different order of criteria assessments not found in the Supplemental Site Specific Comprehensive Plan Criteria.

84-1

Herein are the applicant’s objections to the staff analysis and comments as contained in the staff report:

Background –

The staff report recounts that the site has some environmental conditions that pose potential building limitations. Not mentioned in this context is the fact that portions of the site have no such apparent limitations. Also not discussed is the relevance of this feature to the proposed

Site Specific Comprehensive Plan Amendment/Rezone proposal or that other property west and north of the site has a greater extent of these potential building limitations than does the Tallman site. These are the areas Zoned Rural Residential.

84-2

Staff's mention of this environmental features requires more context.

Surrounding Zoning and Land Use:

It is important to note that land abutting the site that are described as "non-commercial forest" or County owned land that is used for a rock quarry. These sites carry a Rural Wooded Zoning classification, but are not likely to support any residential use. Sites that have potential to accommodate homes are Zoned Rural Residential. If significant environmental constraints were found on this land then it is possible the County might have zoned it Rural Protection.

84-3

EVALUATION –

General Criteria (KCC 21.08.070.A)

These General Criteria questions were not part of the application material the applicant was required to address or at least not as worded and presented in the staff report. See also the comments recorded on Page 5 of this response regarding the Reclassification Request Criteria (KCC 21.08.070.D).

The objections addressed herein and in subsequent discussions regarding criteria compliance, reflect some of the answers to these questions as posed in the application material.

A.1. How circumstances related to proposed amendment and/or the area in which the property affected by the proposed amendment is located have changed since the adoption of the Comprehensive Plan or applicable development regulations –

While the Staff says there are no changed conditions, that statement presumes several things that are not true:

84-4

1. The County in all previous planning exercises examined each and every individual parcel for its potential inclusion in one plan category or another;
2. That the County's opinion is superior to that of the landowner and that it knows what is best for an area;
3. That the "broad brush" with which the County paints properties green (or whatever color) includes a comprehensive understanding of local environments.

In this instance a "broad brush" was used to paint lands Rural Wooded that in this area are mostly public lands. The precedent for how property is used for residential purposes in this area is Rural Residential in character and not Rural Wooded – especially for property that has substantial frontage on a major arterial. The changed condition is that the Tallman property is no longer in County ownership, which it was when the Rural Wooded Zoning was first introduced in the County's Comprehensive Plan in 1998. The County traded this parcel for property in South Kitsap County that was to become a park.

Staff's conclusion on this point is not accurate, the applicant still contends the criteria is satisfied.

A.2. How the assumptions upon which the 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 -

Staff says “the assumptions upon which the Comprehensive Plan is based are still generally valid.” But not addressed is the impact of six (6) lots and a potential of 15 people would do to the County’s overall population projects for the next 20 years.

Staff’s assessment is not complete. The applicant still contends the criteria is satisfied.

84-5

A.3 – How the requested re-designation is in the public interest and the proposal is consistent with the Kitsap County Comprehensive Plan -

Staff says that “the County aims to focus a greater share of growth into urban areas.” And that “the application is not consistent with this aim.” Clearly the argument is “hog wash.” This is not a rezone request to change the balance of urban versus rural land. Also, the Staff has not defined what “public interest” has to do with this application. When one rules out, public health and safety, neither of which are manifest issues in the proposed Amendment / Rezone request, that leaves only welfare to be considered as a potential “public interest” topic. If a serious analysis is made of “welfare” with to either the general area in which the subject property is found or in what development options of the property may be, more data would have to be provided.

Since the Staff has not defined what constitutes “public interest” and based on what Staff says about Comprehensive Plan compliance, the Staff’s comments are inconclusive. The applicant still contends the criteria is satisfied.

84-6

Reclassification Request Criteria (KCC 21.08.070.D)

D.1.a – The proposed amendment meets concurrency requirements for transportation, sewer and water, and will not result in significant adverse impacts on adopted level of service standards for other public facilities and services, such as police, fire and emergency medical services, park services and general governmental services -

Staff’s discussion centers on small incremental changes in site density that may equate to small incremental demands for services. This is not an urban environment and one issue often overlooked in the public sector is that inhabitants of these areas do not have the same level of reliance on public services that those in urban areas do.

Staff’s assessment is inconclusive. The applicant still contends the criteria is satisfied.

84-7

D.1.b – the proposed amendment is consistent with the balance of the goals, policies and objectives of the current Kitsap County Comprehensive Plan and reflects the local circumstances of the County –

The Staff assessment of this issue indicates the small (miniscule really) incremental increase in population would diminish the amount of people going into urban areas. While technically true this is a ridiculous postulation that ignores among other considerations all of the non-

84-8

conforming lots found in rural areas that could be developed –even at urban densities such as in the South Kitsap Area of Manchester and Woods Road.

The Staff's analysis and conclusions are in general are inconclusive. The applicant still contends the criteria is satisfied.

84-8
cont.

Kitsap County Comprehensive Plan Goals and Policies

Section 2.2 Urban Growth Areas of the Land Use Element of the 2012 Adopted plan –

Staff cites the 3A.2.1 Rural Lands section of the Land Use Element of the Comprehensive Plan and lays out Goal 1, Policy RL-1, RL-2, RL-3, Goal 4, and Policy RL-17

Staff says that the proposed Amendment / Rezone would retain the rural character of the County, but at a higher density than allowed by Rural Wooded.

84-9

Regarding Goal 19, the staff says that the long term strategy for preserving timber production could be compromised by the applicant's proposal. This is not a proven fact or necessarily a likelihood. First there must be such a strategy and that does not appear to be the case. And there is nothing to prove that timber production cannot occur in a Rural Residential Zone. If staff looks closely at the County's gravel mining operation on the abutting property to the south the conclusion drawn is this is not an activity that preserves land for timber production

Staff comments are in general agreement that the proposal satisfies this goal but inconclusive with respect to preservation of land for timber production.

Growth Management Act Planning Goals (RCW 36.70A.020)

Staff references Goals 1), 2) 8), 9) and 10) and that the proposed Amendment / Rezone is not supported by these Goals because there would be pressure to convert other Rural Wooded properties to Rural Residential use. **The argument fails because of the public ownership patterns in the area as earlier noted.**

84-10

D.1.c – The subject parcel(s) is suitable for the requested land use designation based upon, but not limited to, access, provision of utilities, consistency with existing and planned uses, environmental constraints and compatibility with the neighborhood –

See above comments about GMA goals and policies and comments in D.1.b.

Staff's analysis and conclusions are without merit and not correct.

84-11

D.1.d – The proposed amendment does not materially affect the land uses and growth projections which are the basis for comprehensive planning, and reflects local circumstances in the County –

See above comments regarding Comprehensive Plan Compliance and that for D.1.b.

Staff assessment and applicant's analysis are at variance with the applicant's analysis.

84-12

Kitsap County-wide Planning Policies –

Please note the applicant's objection to the County-wide Planning Policies (CPPs) being part of analysis criteria as explained on Pages 3 & 4 of the applicant's response to the Supplemental Comprehensive Plan Amendment Criteria. Also to be referenced here is the e-mail transmitted to Katrina Knutson and Dave Greetham on November 17, 2015 providing further discussion of why the CPPs should not be used to evaluate Site Specific Comprehensive Plan Amendment? Rezone proposals. If Staff continues to refer to these policies as set forth in their staff report for evaluative criteria and they can subsequently defend the use of those policies as discussed in the November 17, 2015 mentioned above, **the applicant reserves the right to address** the Staff's compliance assessment either as contained in the November 9th staff report or as detailed in a response to that November 17th e-mail from W.M. PALMER CONSULTANTS.

84-13

Also note that County-wide Planning Policies (CPPs) are only to be employed as comprehensive plan framework criteria to judge that the County and the Cities have coordinated plans. Each of those jurisdictions have separately adopted CPPs, but none so far have tried to include them or portions of them in their respective comprehensive plans. **And that is a good thing** since the **so-called policies are mostly not policies at all**, they are written to be regulations with mandates like shall and must in the verbiage, but not codified as an ordinance. Just in the 2010-2011 amendments there are 118 instances when this has occurred. Many other so-called policy statements are laughable examples of meaningless platitudes.

84-14

Note here the Staff returns to the assessment criteria as found in the application criteria.

Criteria 4a and 4b

Were addressed by the applicant and judged to be satisfied with the applicant's proposed Amendment / Rezone.

Based on the analysis and conclusions Staff has presented, which have been refuted, this response and the original application material, demonstrates the Tallman proposed RW to RR Site Specific Comprehensive Plan Amendment / Rezone has met the criteria for approval.

84-15

Please allow the applicant to reply to any further Staff analysis and/or conclusions drawn, prior to submittal of document to the Planning Commission for Public Hearing. Also, clarification is needed to determine whether the comments contained in this letter are to be included in the response to the Draft Supplemental EIS, before the Final Supplemental EIS is published.

Thank you for the opportunity to respond to the Staff Report.

Sincerely,



William M. Palmer

W.M. PALMER CONSULTANTS

cc. James Tallman



November 24 , 2015

Katrina Knutson, ACIP
Jeff Arango, ACIP, Senior Associate, BERK Consulting
Department of Community Development
614 Division Street, MS - 38
Port Orchard, Washington 98366

SUBJECT: Response To Staff Report For Chuck Bair's Site Specific Comprehensive Plan
Amendment – Rural Residential 5 Ac. To Rural Industrial - Permit No: 15 00697

Dear Katrina, Jeff,

This letter is a response to the Staff Report issued on November 9, 2015 analyzing the Bair Site Specific Comprehensive Plan Amendment / Rezone proposal to reclassify and rezone Mr. Bair's property on Hilltop Lane NW & Chico Way NW. This parcel is further referenced by Kitsap County Assessor / Tax Number – 082401-3-068-2002.

It is noted that the staff report contains no specific recommendation. There are none-the-less implied recommendations or conclusions. Many of the comments made by staff seem to ignore the applicant's responses to the same questions. That begs the question as to how the two documents, i.e. the applicant's responses verses the staff's analysis is to be presented to the Planning Commission and ultimately to the Board of County Commissioners? Because that is unclear and because the staff analysis contains unsupported opinion and some inaccuracies it is necessary to object to much of what is in the staff report – particularly in the response to evaluation criteria. Also the format of criteria questions addressed by staff is problematic and therefore confusing as there are criteria questions not posed in the application material and there is a different order of criteria assessments not found in the Supplement Site Specific Comprehensive Plan Criteria.

85-1

Herein are the applicant's objections to the staff analysis and comments as contained in the staff report the staff report:

Background –

The staff report mentions that the parcel occurs in a “Category II critical aquifer recharge area,” but fails to make it clear as to how that is pertinent to the analysis of the proposed Comprehensive Plan Amendment or proposed use. For example, there is only minimal aquifer recharge (if at all) on a developed parcel. In the portion of the site where the auto repair activity took place, there is no green area and a large graveled parking / driveway area. Where the single-family residence once stood, there was an area for septic waste disposal. If the site has / had any aquifer recharge it was from the septic waste disposal system. That fact would not appreciably change were the site to be developed in accord with the allowable uses found in a Rural Industrial site. Thus other than mentioning this environmental condition it is not a significant factor by which to evaluate either the prior existing uses of the site or the potential use of the site.

85-2

Surrounding Zoning and Land Use –

The “Exhibit 1” chart found on Page 2 is not accurate and not consistent with the information presented by the applicant. The current land use on the south of the subject property is **not** Government and Services. It is in fact an industrial use and has been for a very long time, even predating GMA planning activity. The site, i.e. Tax Parcel No: 082401-3-067-2003 was owned by Triton Marine Construction Corp. at the time of application. This company was not a “government owned” or could in anyway be considered a government entity even if it had had a contract with the Navy or some other governmental agency.

85-3

In July of this year (2015) Triton Marine Construction Corp. sold the property to Dana C. and Donna L. Pieze and they have since established their Dana Heating Company there. They had a right to do so because the prior and continuing use of the property was / is nonconforming Industrial. The chart, thus should be changed to reflect the actual use of Parcel 067.

On Page 3 in the discussion of Rural Industrial, there is bold text stating “Error! Reference source not found.” What is the meaning of this bold text? It is unclear and reflects the fact that perhaps the Staff could not find in the Comprehensive Plan where there is a discussion of Rural Industrial.

Regarding the sentence found at the bottom of Page 3, while it is a fact that “lot size and density are inapplicable in the Rural Industrial Zone. How is this fact relevant to the proposed Rural Industrial Zone?

EVALUATION –

General Criteria (KCC 21.08.070.A)

These General Criteria questions were not part of the application material the applicant was required to address or at least not as worded and presented in the staff report. See also the

comments recorded on Page 5 of this response regarding the Reclassification Request Criteria (KCC 21.08.070.D).

The objections addressed herein and in subsequent discussions regarding criteria compliance, reflect some of the answers to these questions as posed in the application material.

85-4

A.1. How circumstances related to proposed amendment and/or the area in which the property affected by the proposed amendment is located have changed since the adoption of the Comprehensive Plan or applicable development regulations -

Staff says there are “no substantially changed circumstances since the adoption of the comprehensive plan.” This statement has no context. First in order to make such a statement one must first reference the adoption date of the Comprehensive Plan. For example, the Comprehensive Plan was first adopted in May of 1998 and amended several times since that date. The last major update took place in December 2006. Of course the provisions of that plan were appealed and the County had to redo the plan in the 2010 – 2012 period with adoption in December of 2012. Meanwhile in 2010, several plan amendments were passed affecting Rural Kitsap County. Those amendments (and they were not changed substantially in 2012) have a significant bearing on how one may answer this question in the context of the Bair Plan Rural Industrial Amendment/Zoning proposal. Among the changes were the provisions for Rural Industrial and Rural Commercial.

85-5

Prior to 2010 Industrial and Commercial plan provisions were not distinguishable between UGAs and Rural Areas. Thus the criteria for what was / is appropriate in rural areas had to be similar to the same criteria in UGAs. And the Title 17 code amendments also adopted in 2010 reflected the Changes to the Rural Element of the Comprehensive Plan. By making a distinction of a “Rural” Industrial or “Rural” Commercial it was possible to apply these plan/zone classifications independent of an assessment for availability of public services. Certainly, this is a “changed condition” that is in fact different than what was possible in the 1998 – 2009 era. “Changed Conditions” can be both policy and environmental / physical circumstances.

85-6

In case Staff wishes to argue that there have been no changed conditions since December of 2012 to the physical environment, clearly that is an argument without context. In 2012 the planning process tasks were to reduce the size of the UGAs as that was the primary focus of the appeal of the 2006 comprehensive plan. The County did not revisit the rural areas as they had been addressed in 2010. And in both 2010 and 2012 there was not a comprehensive analysis of all rural areas (even though many such areas were analyzed) to determine how the new “Rural Commercial” and “Rural Industrial” Plan provisions might be applied in specific locations. Also, in December of 2010, the Board of County Commissioners set a three year moratorium on Site Specific Comprehensive Plan / Rezone Amendments. Because of the mandatory redo of the 2006 Plan that was adopted in 2012, Site Specific Comprehensive Plan / Rezone Amendments were discouraged in 2012 and the process for such was further postponed from 2013 until the 2015-2016 require Plan Update. So there has not been an opportunity for individuals to evaluate their property in light of the changes that occurred in 2010. Thus, the 2010 Rural

85-7

Element Plan Amendments are in fact the "changed condition" that prompts the Bair Rural Industrial Plan Amendment/Rezone proposal.

85-7
cont.

A.2. How the assumptions upon which the 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 - Staff says "the assumptions upon which the Comprehensive Plan is based are still generally valid." Considering the fact staff did not reference a specific date wherein the Comprehensive Plan was adopted or amended, there is no context to make this statement. Clearly, when one examines the plan amendments for rural areas to include the provisions for "Rural Industrial" and "Rural Commercial" the assumptions in the Comprehensive Plan are not the same as what the County adopted in the 1998 Plan, the 2002-2003 Amendments or the 2006 Update. The 2010 Amendments did in fact make changes in the "Rural Element" of the comprehensive plan and a number of assumptions were changed from the way the County had addressed rural versus urban areas in the 1998 and amendments or updates adopted after those dates. So what Comprehensive Plan is the Staff referencing?

85-8

Also, the statement that "Updated growth targets and capacity analysis is being conducted as part of the 2016 Comprehensive Plan update, but in general that process will not change the assumptions relative to the subject property." This statement ignores several issues and facts:

- a.) There is no reference to what assumptions the Staff has in mind, either as expressed by policy in the Comprehensive Plan or as may be addressed by the Buildable Lands Report. And regarding the latter, it is well known by staff that the BLR is under appeal so how can one know what that report will eventually conclude?
- b.) If one were to Examine Exhibit 4. County Vision for Rural and Urban areas what aspects of the Bair Rural Industrial Plan Amendment/Rezone proposal are inconsistent with this "Vision" statement? And does this chart represent the "assumptions" the Staff say have not changed? If so, then the Staff should so state that fact. If there are other assumptions to be referenced what are they?
- c.) If there are Updated growth targets what are they and what aspects of the Bair Rural Industrial Plan Amendment/Rezone proposal are inconsistent with those targets? Without specifics how does one know how much or how little commercial or industrial land is appropriate for a rural versus an urban area?
- d.) According to the Buildable Lands Analysis Report in all of Central Kitsap County excluding the City of Bremerton there are only 37.66 net developable acres of commercial (all types) land within the UGA and no acres of industrial property. (See Employment Capacity chart in Appendix C). In all of unincorporated Kitsap County there is only 22.80 acres of vacant rural industrial land spread out north to south in the County. And according to the BERK Memorandum dated December 11, 2013 and updated February 6, 2014 that company points out in their Land Use Targets (See Page 2) Kitsap County had provided them with no adopted long-range employment targets. This memorandum is also found in Appendix C. Therefore it is incumbent on Staff to provide information not available to the applicant prior to February 27, 2015 if this issue

85-9

is going to be part of "compliance criteria" to judge Mr. Bair's proposed Rural Industrial Classification / Rezone request.

Staff's assessment is flawed and therefore leads to a false conclusion.

A.3 – How the requested re-designation is in the public interest and the proposal is consistent with the Kitsap County Comprehensive Plan -

Staff says that the County "aims to focus a greater share of growth into the urban areas." And the Staff goes on to say that "The proposed amendment is inconsistent with this goal as it would increase industrial development intensity and capacity in the rural area and introduce a single isolated RI parcel in an otherwise RR Zone." There are several problems with this statement:"

- a.) When one considers the scale of the proposed Bair Rural Industrial Plan Amendment/Rezone proposal **it is difficult for Staff to argue** that the Bair Amendment is inconsistent with this aim of the County.
- b.) In 1998 and in subsequent Comprehensive Plan updates or amendments, the County chose to arbitrarily ignore the urban level services and development patterns that are present in the Chico Way corridor and in the Erlands Point area. Consequently the County painted the area Rural Residential, when in fact this corridor and the Erlands Point Area **does not meet** the criteria for a Rural Residential designation. See Policy RL-1 "*Limit the designated rural area to low residential densities that can be sustained by minimal infrastructure improvements, cause minimal environmental degradation, and that will not cumulatively create the future necessity or expectation of urban levels of service.*" So if sewer service is present in the Chico Way corridor (which it is in the north end of the corridor), the development pattern of lots is small in the half-acre to acre sizes and developed with homes, businesses, apartment houses, a major golf course, industrial uses and the roadway is a major north/south arterial, somehow that is rural?
- c.) Just like it did to ignore the urban level development in the Chico Way Corridor and the Erlands Point area, Kitsap County chose not to recognize a long standing industrial use on property immediately adjacent to the Bair property in all prior comprehensive planning efforts. Also ignored in all of those prior comprehensive planning exercises was the automotive repair business that operated for many years on the Bair property.
- d.) Had the above mentioned conditions had be recognized there is no way to conclude that the Bair Rural Industrial Plan Amendment/Rezone proposal is introducing "a single isolated RI parcel in an otherwise RR Zone." Also, by mischaracterizing the industrial use of the former Triton Marine Corporation Company property as "governmental or service related" the Staff has set up a false premise to come to a false conclusion.

Reclassification Request Criteria (KCC 21.08.070.D)

Note: Staff has managed to confuse the presentation of their Reclassification Request Criteria discussion so that it is different than how these same or similar questions were posed in the application material the applicant was required complete. Also, the Staff provides no

85-9
cont

85-10

recognition of the applicant's answers to these same questions. This unnecessarily complicates both the applicant's response to the Staff Report and suggests to the Planning Commission and ultimately the Board of County Commissioners that the applicant did not respond to the appropriate questions. Why is it the Staff chose to use a different format in how it addresses the criteria than the one used in the application material?

85-11

D.1.a – The proposed amendment meets concurrency requirements for transportation, sewer and water, and will not result in significant adverse impacts on adopted level of service standards for other public facilities and services, such as police, fire and emergency medical services, park services and general governmental services -

Staff essentially concurs with the applicant that there are no significant adverse impacts on adopted levels of service standards or other public facilities and level of service standards for other public facilities and services. See applicant's response to Question e. found on Page 3 of the applicants "Supplemental Comprehensive Plan Amendment Criteria" discussion.

85-12

The statement the Staff makes about "a greater impact could occur (on transportation access) if this spot rezone sets a precedent of **concentrating employment uses in this location**" is a false conclusion for two reasons: 1.) It ignores the long standing industrial use on the adjacent parcel and 2.) it ignores the small scale of development that the Bair and Dana Heating parcels represent.

Further, for-all-intents-and-purposes the Growth Management Act did away with "spot zoning." The case law addressing this issue, which dates back to the pre-GMA era, is not applicable to Site Specific Comprehensive Plan Amendment proposals because by definition such proposals are across the board a type of what was once called "spot zoning."

Regarding this issue, the Staff has presented an inaccurate statement that leads to a false conclusion.

D.1.b – the proposed amendment is consistent with the balance of the goals, policies and objectives of the current Kitsap County Comprehensive Plan and reflects the local circumstances of the County -

Staff says the Bair Rural Industrial Plan Amendment/Rezone proposal is not supported by the above rural and resource lands vision as found in Exhibit 4. County Vision for Rural and Urban Areas. It may be noted that while Exhibit 4 addresses Rural Areas it also is applicable to Urban Areas (see title of the chart). Regarding Rural areas, the "Vision Statement" includes this statement "Allow for limited commercial and industrial uses in rural areas, while preserving rural character." Given the scale of the combined area of Mr. Bair and the now Dana Heating Company, by any standard of measurement this is a limited area for an industrial use. Also see comments in applicant's response to Staff's analysis for KCC 21.08.070.A.2. **The Staff's analysis is in error.**

85-13

Staff says the Bair Rural Industrial Plan Amendment/Rezone proposal is not supported by the vision statement in Exhibit 4 because it constitutes and expansion of industrial zoning into an area that has "historically been designated for low density rural residential use." Again this is a

85-14

statement without reference to a specific Comprehensive Plan. For example, between the years 1978 and 1995 County's rural areas were 2.5 Acre Zoned with the possibility that smaller lot sizes could be created in these rural areas by use of the Rural Planned Unit Development standards. Prior to 1975 nearly all of rural Kitsap County had a minimum lot size of 35,000 square feet and the shoreline areas were mostly zoned R-2, which allowed divisions of land into 20,000 square feet lots. So "historically" Kitsap County did not zone property to today's Rural Residential Standards. The Chico Way corridor, however was not zoned Agriculture, Forest or Undeveloped Land in the 1968 – 1974 era and not Rural 2.5 in the 1975 – 1994 time frame. It was zoned Single Family Residential with some mix of Commercial, allowing lot size creation in the 7,500 – 20,000 square feet range. Evidence of that fact exists when looking at the lot size configuration of the parcels found in the Chico Way Corridor and in the business that developed in this corridor. **The Staff's analysis and conclusion is not correct.**

85-14
cont.

Staff says the Bair Rural Industrial Plan Amendment/Rezone proposal "would constitute an expansion of industrial zoning as the subject property is not within an existing rural commercial or industrial area. **This is a false conclusion for two reasons:** 1.) the Comprehensive Plan's discussion of "Rural Industrial" found in the discussion of 3A.1.8 Rural Economies, Page 38 **does not limit** expansion zoning to be "within and existing industrial area;" 2.) It ignores both the past use of Mr. Bair's site and the existing industrial use of the property adjacent to the Bair parcel on the south. The further statement about "not establishing new disconnected industrial areas though the re-designation of individual parcels is both false for the same two reasons. Also the point is, the Comprehensive Plan addressing the provisions for rural commercial and industrial contradict the Staff assertion that rural industrial zoning cannot be "disconnected from other industrial areas" see paragraph at the bottom of page 36 and top of page 37 of 3A.1.8 Rural Economies. This paragraph says that there are "some commercial and industrial activities outside these areas (Type III LAMIRDs). **Clearly the Staff's analysis and conclusions are not correct.**

85-15

Kitsap County Comprehensive Plan 2036 Goals and Policies

Note: There are no Kitsap County Comprehensive Plan 2036 Goals and Policies and the subsequent discussion under this heading are the goals and policies as adopted in 2010 and 2012. Therefore this is both a misleading heading and an inappropriate characterization of what follows in the goals and policy analysis.

3A.2.3 Rural Lands – Goal 2. And Policy RL-8 –

Please note that while Policy RL-8 is in the Comprehensive Plan it is both poorly worded, not a policy, but a regulation and fails to recognize that compliance with GMA is the necessary responsibility of Kitsap County when it adopts a comprehensive plan and not a requirement for development or subsequent zoning to be compliant with GMA. Consider the fact that different jurisdictions such as Pierce and Thurston Counties have provisions in their Rural Elements that allow clustered development in Rural Areas and therefore lot sizes below five

(5) acres in their rural areas. That is "GMA" compliant whereas in Kitsap County that type of "compliance" allowance is not permitted. Incidentally, GMA's provisions for Rural Areas makes no distinction for minimum lot or parcel sizes. See RCW 36.70A.070.5. (b) & (c).

Staff says that the Bair Rural Industrial Plan Amendment/Rezone proposal is not consistent with Policy RL-8, but a reading of the policy in light of Mr. Bair's proposal should indicate that only "limited expansion" of an existing industrial use is involved.

85-16

As for "consistency with GMA and Comprehensive Plan requirements for rural areas, preserve Kitsap County's character and shall not allow urban-type uses or services" the Bair proposed LI Zoning has virtually no adverse impact on the rural character of the Chico Way Corridor and the proposed use is no more an Urban-Type use than the facility next door or the type of mini-storage / RV storage development found in South Kitsap County on Spring Creek Road next door to the Auction Barn and the State Department of Transportation facility. In the for-what-its-worth department, both the Stokes Auction Barn and the State DOT facility are Zoned Rural Residential.

85-17

Staff makes an unfair statement about Mr. Bair by saying that "*Zoning should reflect a coordinated effort to plan for commercial and industrial development at the neighborhood district or sub-district level and not be based on the personal interests of a single property owner.*" First of all that is opinion not supported by a careful analysis of Kitsap County's prior development to include such zoning as described in the preceding paragraph. Second, it fails to recognize that it takes individuals like Mr. Bair to propose uses that increase the economy of the County if only by the increase in tax base. For example the former Triton Marine Corporation and now Dana Heating site has a value of \$370,000.00 or \$9.44 per square feet (both buildings and land) and Mr. Bair's site, while still residentially zoned has a value of \$75,000.00 or \$2.46 per square feet (land value). A simple analysis reveals that Mr. Bair's zoning request does result in a net benefit to Kitsap County and all of the special purpose taxing districts. Again it is unfair to say or imply that Mr. Bair is the only one to benefit by the proposed LI Zoning.

85-18

Clearly the Staff Analysis and Conclusions are not correct.

D.1.c – The subject parcel(s) is suitable for the requested land use designation based upon, but not limited to, access, provision of utilities, consistency with existing and planned uses, environmental constraints and compatibility with the neighborhood –

Note here the Staff Report goes back to the Criteria Questions found in the application material.

Regarding this question see applicant's response on Page 2 of the Supplemental Comprehensive Plan Amendment Criteria. Staff assertion that the property is "not suitable for the proposed land use designation" is a conclusion based on opinion and ignores the industrial use of the abutting property on the south. Even though staff stipulates there is a non-conforming use to the south they characterize it as commercial not industrial. Equally a

85-19

problem is the notation that this non-conforming use will be phased out over time. The industrial buildings on the south side of the Bair property have been in use since 1982 and have been and are now occupied by yet another industrial business. This was earlier noted in this response on Page 2. The prospect of the industrial use being phased out any time within the next twenty (20) years is next to nil. Therefore this is a false assessment and if Kitsap County had done a proper analysis of existing industrial uses in this portion of the County either in 2010 or 2012 there should have been a recognition of this long standing use and the establishment of RI Zoning here rather than force the owner of the property to live under the specter of non-conforming status.

85-19
cont.

Staff goes on to say that "Future industrial development should locate in existing areas that have available capacity for new or redevelopment." This is a statement not supported by analysis of these so-called "existing areas." Where are they? And why was the existing industrial use overlooked or mischaracterized first as a Government or Service use and now by calling it commercial?

Staff's analysis and conclusions are without merit and not correct.

D.1.d – The proposed amendment does not materially affect the land uses and growth projections which are the basis for comprehensive planning, and reflects local circumstances in the County -

See applicant's response on Page 2 & 3 to the Supplemental Comprehensive Plan Amendment Criteria.

Staff response essentially agrees with the discussion presented by the applicant, i.e. there is compliance with this criteria.

85-20

D.1.e – the proposed amendment does not materially affect the adequacy or availability of urban facilities and services to the immediate area or the overall areas of the urban growth area -

See applicant's response on Page 3 to the Supplemental Comprehensive Plan Amendment Criteria.

Staff response essentially agrees with the discussion presented by the applicant, i.e. there is compliance with this criteria.

85-21

D.1.f – The proposed amendment is consistent with the GMA, Kitsap County-wide Planning Policy, state and local laws and other applicable Inter-jurisdictional policies or agreements - Please note the applicant's objection to the County-wide Planning Policies (CPPs) being part of analysis criteria as explained on Page 4 of the applicant's response to the Supplemental Comprehensive Plan Amendment Criteria. Also to be referenced here is the e-mail transmitted to Katrina Knutson and Dave Greetham on November 17, 2015 providing further discussion of why the CPPs should not be used to evaluate Site Specific Comprehensive Plan Amendment? Rezone proposals.

85-22

Regarding staff's discussion on this criteria – the GMA citation of RCW 36.70A.020 as explained by staff talks about (2) "Sprawl" as defined by "low-density development." That discussion is not applicable to Rural Industrial for three reasons: 1.) "low-density development" describes residential patterns of growth not commercial or industrial; 2.) the collective development of the existing (now Dana Hearting use) and Mr. Bair's proposed use is in fact a low intensive type of industrial use; 3.) Kitsap County amended its Comprehensive Plan in 2010 to provide for Rural Commercial and Rural Industrial. Those amendments were judged compliant with the GMA by both the State Department of Commerce and Kitsap County. Thus, the Staff's inclusion of this GMA provisions for "sprawl" is not an appropriate measure to analyze the Bair Site Specific Comprehensive Plan Amendment / Rezone proposal.

85-22
cont.

Regarding (5) Economic development. – Staff's comments are reflective only of opinion and not a careful review of even their own comprehensive plan. See prior response comments to D.1.b on page 6 of this letter.

Staff assessment and conclusions are either inappropriate to the Assessment Criteria, incorrect or nothing more than opinion.

3.a. Demonstration of unmet need for the proposed land use designation in the rural area -

Note here the Staff returns to the assessment criteria as found in the application criteria.

85-23

Regarding unmet need for the proposed land use designation in the rural area – Staff says *"the unmet needs identified by the applicant pertain to the specific circumstances of the property owner and are not connected to the public interest."* **This statement by Staff is not accurate.** The applicant's response detailed an "unmet need" by comparison with a Rural Industrial Zoned property in South Kitsap not just the specific circumstances of the property owner. If Staff is going to make reference to "public interest," a term not included in this Criteria, there needs to be a definition of what that means. When an individual pursues an economic enterprise he or she does so to address an unmet need of one kind or another. Economies grow no matter where located only when business are formed to meet unmet needs. Clearly Kitsap County has addressed this "public interest in Section 3A.1.8 Rural Economies when it states *"The Growth Management Act recognizes and encourages rural economic development that is focused on providing employment and services to rural residents."* See page 37 of the County's Comprehensive Land Use Element.

The Staff goes on to state: *"The applicant has provided no evidence that the unmet need cannot be accommodated with in urban areas or land already zoned RI."* Point in fact the applicant did address that aspect of the unmet need by stating there are no available industrial or even Rural Industrial Zoned areas within the close by UGA to accommodate the applicant's proposed use. Also there are no Rural Industrial Zones with convenient access to Chico Way.

Staff assessment and conclusions are without merit and incorrect.

3.b. Rural Character preserved or unaffected by the change –

Staff asserts: *"The introduction of industrial zoning in a Rural Residential neighborhood would not preserve the rural residential character of the area as the subject property would be the only property in the immediate area with the industrial zoning designation."* This statement while technically accurate is not a practical reality because it does not address or recognize the long standing existing non-conforming industrial use abutting the Blair property on the south. Also if the Staff could be candid, there is nothing about the Chico Way Corridor or the Erlands Point area that has "Rural Residential Character" that must be why the Staff goes on to suggest that *"Concentration of UI (urban industrial?) is more in keeping with rural character rather than single industrially zoned parcels."* Note a clarification of UI has been added, which is the only way to make sense of that statement. Even with the clarification the statement still makes no sense.

85-24

Staff assessment and conclusions are without merit and incorrect.

3.c - Demonstration that proposed designation will principally serve the rural area –

See applicant's response on Page 8 also on Pages 5-7 to the Supplemental Comprehensive Plan Amendment Criteria.

Staff asserts that *"The applicant has provided no evidence that the proposed designation will principally serve the rural area."* The applicant did indeed provide such evidence by comparison to a South Kitsap County Rural Industrial area. Also, the text of the applicant's response indicates that the service area for this proposed Rural Industrial site extends to Wildcat Lake, Camp Union and even Seabeck, but the focus is on the so-called Rural Residential Chico Way Corridor, which as earlier observed does not meet the criteria for a Rural Residential Comprehensive Plan classification or Zoning designation. And the Chico Way Corridor as well as Erlands Point does not fit the Rural Character description found in 3A.1.3 of the Land Use Element of the Comprehensive Plan on Pages 4 -8. Thus for Staff to say further that the proposed amendment appears solely for personal gain and not based on public interest" is problematic for the same reasons identified in the criticisms of the Staff analysis / assessment of 3.a. Central to Staff's contention is this so-called "public interest" issue that is not mentioned in the criteria or defined by Staff.

85-25

A redundant comment is in order if Staff is going to continue to base its judgements on "public interest." Before raising that as a criteria three factors need to be addressed: 1.) What constitutes "public interest" in the context of uses serving a rural area or an area like the Chico Way Corridor, which is only rural by virtue of an artificially applied zoning category? 2.) How "public interest" is tied to an assessment of what use will or will not principally serve the rural area. And 3.) How "public interest" is manifest in economic enterprises? Are not economic enterprises primarily driven by private sector gain of one sort or another? Is the Staff trying to suggest that only when government proposes a business that somehow that is in the "public interest" and that any enterprise promoted by individuals is not in the public interest because there is remuneration that only redounds to an individual?

Clearly Staff has made an assessment, has drawn a conclusion that they cannot defend, that is in essence without merit and incorrect.

3.d. Demonstration that appropriate rural services are available –

See applicant’s response to the Supplemental Comprehensive Plan Amendment Criteria on applicant’s Pages 1 & 8.

Staff comments concur that this criteria has been satisfied.

85-26

3.e. Demonstration that the proposal is contiguous to existing industrial or commercial zoning –

Staff’s assessment is that no such zoning abuts the property. However when Staff goes on to state that “there is no unique or exceptional need has been identified,” they have in fact failed to recognize either the prior existing use of automotive repair that took place on the site (with the garage facility still evident there or the industrial buildings of which there are three (3) on the property to the south that houses an industrial use. These ignored facts are unique and exceptional in the context of this area of the Chico Way Corridor. It may be noted also that Triton Marine Construction Corporation held the Blair property in its ownership and had slated it as an expansion area for their use.

Failure of Staff to recognize these factors as addressed by the applicant in his responses provides an incomplete assessment on their part and leads to an inappropriate conclusion.

85-27

3.f. Demonstration that the property is sized appropriately for the proposed land use designation -

Staff’s assessment that the site does not meet this criteria is not based on facts. The Rural Element of the Comprehensive Plan, particularly the discussion on Page 37 of Rural Industrial emphasizes “the intent and function of the Rural Industrial Zone is to provide for small-scale light industrial.....” All of the examples cited in that text are sites in the half-acre to acre range and do not have multiple properties. Also to be noted is the discussion the applicant provided in his assessment of compliance with this criterion – see page 9 of the Supplemental Comprehensive Plan Assessment Criteria.

Staff’s assessment and conclusion is without merit and incorrect.

85-28

3.g. Demonstration that there is a lack of appropriately designated and available sites within the vicinity –

Staff asserts that the subject property “is located just north of the City of Bremerton and south of a Rural Commercial area that has capacity for new development and redevelopment.” The applicant has responded this question that no such properties are available. In the City the closest vacant parcel of similar size is Zoned Light Commercial and that zone does not permit the kind of use Bair envisions for the property subject to proposed LI land use classification and ultimate zoning. Property that staff says is available and has the capacity for new development or redevelopment is a. not identified as a specific site and b. is either already developed commercially or has a substantial single-family or multi-family residential use on it. The applicant has considered this area but not found an available property.

85-29

It may be noted that within the Rural Commercial (RCO) Zoned area, it is apparent that Kitsap County has ignored some industrially developed properties as well as some multiple-family

structures and used a broad paint brush when the RCO Zoning action took place. Also ignored is the presence of a sanitary sewer, which should have qualified the zoned area as "urban" not rural. This is further evidence to the arbitrary nature of how zoning decisions have been made in the Chico Way Corridor and the same can be said for the Erlands Point area too.

85-29
cont.

The Staff assessment and conclusions reflect opinion rather than specific examples to contradict the analysis of the applicant.

Based on the analysis and conclusions Staff has presented, which have been refuted, this response and the original application material, demonstrates the Bair proposed Rural Industrial Site Specific Comprehensive Plan Amendment / Rezone has met the criteria for approval.

85-30

Please allow the applicant to reply to any further Staff analysis and/or conclusions drawn, prior to submittal of document to the Planning Commission for Public Hearing. Also, clarification is needed to determine whether the comments contained in this letter are to be included in the response to the Draft Supplemental EIS, before the Final Supplemental EIS is published.

Thank you for the opportunity to respond to the Staff Report.

Sincerely,



William M. Palmer
W.M. PALMER CONSULTANTS

cc. Chuck Bair



December 4, 2015

Katrina Knutson, ACIP
Jeff Arango, ACIP, Senior Associate, BERK Consulting
Department of Community Development
614 Division Street, MS - 38
Port Orchard, Washington 98366

SUBJECT: Response To Staff Report For Sedgwick Partner's Site Specific Comprehensive Plan Amendment – Urban Low To Highway Tourist Commercial - Permit No: 15 00735

Dear Katrina, Jeff,

This letter is a response to the Staff Report issued on November 9, 2015 analyzing the Sedgwick Partner's Site Specific Comprehensive Plan Amendment / Rezone proposal to reclassify and rezone their property on 2232 SE Sedgwick Road (SR-160). This parcel is further referenced by Kitsap County Assessor / Tax Number – 122301-2-013 -2005.

It is noted that the staff report contains no specific recommendation. There are none-the-less implied recommendations or conclusions. Many of the comments made by staff seem to ignore the applicant's responses to the same questions. That begs the question as to how the two documents, i.e. the applicant's responses verses the staff's analysis is to be presented to the Planning Commission and ultimately to the Board of County Commissioners? Because that is unclear and because the staff analysis contains unsupported opinion and some inaccuracies it is necessary to object to much of what is in the staff report – particularly in the response to evaluation criteria. Also the format of criteria questions addressed by staff is problematic and therefore confusing as there are criteria questions not posed in the application material and there is a different order of criteria assessments not found in the Supplement Site Specific Comprehensive Plan Criteria.

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Herein are the applicant's objections to the staff analysis and comments as contained in the staff report:

Background –

The staff report mentions that a portion of the site has hydrologic soils and therefore is in or near a potential wetland. Also Staff mentions the “Moderate Geological Hazard Area” mapping that shows the subject property is near that feature of the landscape. What is not discussed is the relevance of those two features to the proposed Site Specific Comprehensive Plan Amendment/Rezone proposal. In the SEPA Checklist the applicant submitted, the questions about site development limiting features were answered in the negative. There are no wetlands on the subject property. The soils mapping data Staff references includes only one (soil conditions) of the three elements that must be present for there to be a wetland. If the other two are not found, i.e. wetland type vegetation and hydrology, there is no wetland. Also it is fair to comment that the soil mapping that was performed for Kitsap County was analyzed in the late 1970s and there have been no updates to that study/mapping since then. But in the meantime many features of the natural landscape have changed particularly in this area. Witness the large, small lot subdivision found on the north side of Sedgwick Road that lies right smack in the middle of the “moderate geological hazard area.” And then there is the road improvements the State Department of Transportation has made to Sedgwick Road (SR-160), which cuts across both of these soil / topographic features.

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Staff’s mention of these environmental features is without context and begs the question of why the information was so conveyed?

Surrounding Zoning and Land Use –

The “Exhibit 1” chart found on Page 2 while technically accurate is not consistent with the information presented by the applicant. The current land use on the west side of the subject property is a narrow parcel of single-family residential land that lies adjacent to a large site of st Commercial (C) Zoned property in the City of Port Orchard. Both properties lie within Port Orchard’s city limits.

86-3

EVALUATION –

General Criteria (KCC 21.08.070.A)

These General Criteria questions were not part of the application material the applicant was required to address or at least not as worded and presented in the staff report. See also the comments recorded on Page 5 of this response regarding the Reclassification Request Criteria (KCC 21.08.070.D).

The objections addressed herein and in subsequent discussions regarding criteria compliance, reflect some of the answers to these questions as posed in the application material.

A.1. How circumstances related to proposed amendment and/or the area in which the property affected by the proposed amendment is located have changed since the adoption of the Comprehensive Plan or applicable development regulations -

Staff says that conditions have changed, therefore this criteria is satisfied.

86-4

A.2. How the assumptions upon which the 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 -

Staff says “the assumptions upon which the Comprehensive Plan is based are still generally valid.” However, reference is made to the 2006 Comprehensive Plan Update, when the reference should have been to the December 2012 update because the 2006 Comprehensive Plan with respect to UGAs was invalidated. Also there is a “see Error! Reference Source not found” note that makes no sense.

86-5

Staff’s assessment is unclear and inconclusive. Applicant’s response contends there is compliance with this criteria.

A.3 – How the requested re-designation is in the public interest and the proposal is consistent with the Kitsap County Comprehensive Plan -

Staff says that the Port Orchard’s UGA is “oversized in the No Action Alternative for employment capacity.” The relevance of this statement is unclear. Since the subject property is included in all three alternatives to the Comprehensive Plan in the DSEIS, it is up to the City of Port Orchard to decide (with citizen input) what economic / employment capacity targets they wish to pursue. As of November 16, 2015 the City Council of Port Orchard has said they favor the “No Action Alternative.” It is worthy of note that in 2012 when the County amended its comprehensive plan to reduce the size of the UGA, in this portion of South Kitsap there were no reductions. Also pertinent, is the fact that by 2012, Port Orchard had annexed most of the Bethel Corridor to include the parcel immediately abutting the site on the west. Since the subject property is located in Port Orchard’s UGA in all three alternatives, there has to be the assumption that at some juncture the City will annex the subject property as well. Thus the discussion of oversizing of the Port Orchard’s UGA is nothing more than an academic postulation that ignores what the City of Port Orchard has already said.

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It may be noted that besides what the City Council of Port Orchard has stated, there are **many people in the South Kitsap area who will take great exception** to any reductions in Port Orchard’s UGA. Public opinion seems to have gotten “short shrift” in the County’s 2014 – 2016 Comprehensive Plan development process. Witness the fact that when the alternatives were crafted for the DSEIS there was no prior vetting with the citizens of the County, they were staff derived with some possible input from the City of Bremerton and maybe Poulsbo. Even in the November round of open houses there was not even a presentation of what alternatives the County was considering to the public. So what we have here is a “top down process” with no prior exposure to the decision making process of Staff and as it appears the Board of County Commissioners. The clear message to the citizens of this County is we do not care a whit about what works for them.

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Think that statement is not true? Please examine the annexation actions of Port Orchard following the adoption of the 2006 Comprehensive Plan. The City did not initiate those proceedings.....property owners did! Why? Because of a basic distrust in County government, that had demonstrated a lack of commitment to past comprehensive plan provisions. Property owners in the Bethel Corridor were similarly displeased with broken promises of Kitsap County. Which promises you ask? The ones for traffic improvements to Bethel Road. For close to ten years the County had a plan on the books for this corridor and funded not one single improvement commitment spelled out in their corridor plan or took steps to secure grant funding for those planned improvements.

86-7
cont.

Next Staff states that “the proposed amendment does not appear to be in the public interest.” While it is true that the criteria statement mentions “public interest,” there is no context in which to make that judgement. All “public interest” considerations derive from the police powers accorded jurisdictions within the State of Washington from the phrase “public health, safety and welfare.” Neither public health nor safety issues are manifest in the Sedgwick Partner’s amendment request. “Welfare” can only be a consideration if Staff can show that somehow the “welfare” of the citizens of South Kitsap County is somehow in peril with this proposed amendment or the ultimate use of the site as allowed by the HTC Zone. The applicant argues that there is no such peril or jeopardy to the citizens of South Kitsap County or even in the immediate neighborhood.

86-8

Also germane to this issue is what evidence can the County provide that it even cares about what the people think, when all the County does is record comments provided and produce no evidence that public comment was cause for a change in policy or plan provisions? Consider as point in fact that the Citizen Participation process for this Comprehensive Plan update was designed to preclude face to face dialog about provisions to be included in the 2016 Comprehensive Plan. And when issues are presented in the public hearing process, at best a citizen gets three (3) minutes of verbal comments and the opportunity to submit written opinion that is as likely to be influential in the final plan provisions as chicken has of flying to the moon without a rocket or some type of aircraft.

86-9

Regarding the issue of *“designing a single isolated single-family residential property for high-intensity commercial is contrary to the County’s goals for coordinated planning and focusing commercial growth in compact areas or along transportation corridors with a concentration of commercial and mixed-use properties,”* Staff must take into consideration that a.) the subject property does lie adjacent to a major “transportation corridor” and b.) in this part of South Kitsap the issue of a “compact commercial area” is quite out of character with the Fred Meyer complex, the commercially zoned land between Fred Meyer and the subject property. The statement really does not reflect the ultimate goal of the Growth Management Act, and of Kitsap County which is, when all of the rhetoric is pared away.....”pack-em” and “stack-em” all in urban areas. Well this amendment proposal fits that goal. The subject property is within an urban area (by definition), therefore the proposed amendment is **not contrary** to the County’s goals for “coordinated planning.”

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If the City of Port Orchard has submitted any comments or letters expressing lack of support for this amendment proposal, the applicant has no knowledge of that fact and therefore no prior opportunity to respond to any comments the City could have made. If somehow Staff has relied on those comments in their analysis, it is incumbent on Staff to have communicated those comments to the applicant or their representative prior to or at least as a reference document attached to the staff report. Because that was not done, the applicant reserves the right to address Port Orchard's comments after the deadline for comments of December 7, 2015.

86-11

So exactly what does it mean for Staff to argue the Sedgwick Partner's proposed HTC Comprehensive Plan Amendment / Rezone is not in the "public interest?"

Since the Staff has not defined what constitutes "public interest" and has set up a false premise regarding compliance with the County's goal of "coordinated planning," they have to come to a false conclusion.

Reclassification Request Criteria (KCC 21.08.070.D)

Note: Staff has managed to confuse the presentation of their Reclassification Request Criteria discussion so that it is different than how these same or similar questions were posed in the application material the applicant was required complete. Also, the Staff provides no recognition of the applicant's answers to these same questions. This unnecessarily complicates both the applicant's response to the Staff Report and suggests to the Planning Commission and ultimately the Board of County Commissioners that the applicant did not respond to the appropriate questions. Why is it the Staff chose to use a different format in how it addresses the criteria than the one used in the application material?

86-12

D.1.a – The proposed amendment meets concurrency requirements for transportation, sewer and water, and will not result in significant adverse impacts on adopted level of service standards for other public facilities and services, such as police, fire and emergency medical services, park services and general governmental services -

Staff essentially **concur with the applicant** that there are no significant adverse impacts on adopted levels of service standards or other public facilities and level of service standards for other public facilities and services. See applicant's response to **Question e.** found on Page 3 of the applicants "Supplemental Comprehensive Plan Amendment Criteria" discussion.

86-13

D.1.b – the proposed amendment is consistent with the balance of the goals, policies and objectives of the current Kitsap County Comprehensive Plan and reflects the local circumstances of the County –

In the Staff assessment of this issue there are two errors. The first is a labeling error of "a" instead of D.1."b." Unfortunately this labeling error continues through to the Growth Management Act Planning Goals. The second is the Exhibit 5 "Error! Reference source not

86-14

found.” This is the second time this same “error” message has been inserted into the staff report. Is there no citation from the County’s 2012 Comprehensive Plan or one of the Appendices wherein the “County Vision for Economic Development and Urban Areas can be found?

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cont.

Regarding the Staff comments that follow Exhibit 5, they **are not pertinent** to the contents of the chart. The discussion raises essentially the same issues as in Staff assessment in General Criteria A.3. Refer to the applicant’s response for that criteria as it is applicable here. **Staff cannot rely on Exhibit 5 to say that the proposed Sedgwick Partners’ HTC Comprehensive Plan Amendment / Rezone proposal is not supported by this Vision statement. A careful reading of that statement leads to the obvious conclusion that it does in fact support the applicant’s requested amendment and rezone.**

86-15

The Staff’s analysis is in error.

Kitsap County Comprehensive Plan Goals and Policies

Section 2.2.4.1 of the Land Use Element of the County’s 2012 Adopted plan –

Goal 6: Encourage and reinforce development patterns within UGAs that are distinct from those in rural areas.

Policy LU-29 – Encourage development patterns in UGAs that support and encourage transit use, such as in and around more intensive nodes of mixed use development along major transportation corridors, and major employment centers.

Staff says that the Sedgwick Partners’ HTC Plan Amendment/Rezone proposal is not consistent with Policy LU-29, but a reading of the policy in light of the context of the area west along Sedgwick Road (SR-160) leads to just the opposite conclusion and not to the opinion of Staff.

86-16

Clearly the Staff Analysis and Conclusions are not correct.

D.1.c – The subject parcel(s) is suitable for the requested land use designation based upon, but not limited to, access, provision of utilities, consistency with existing and planned uses, environmental constraints and compatibility with the neighborhood –

Note here the Staff Report goes back to the Criteria Questions found in the application material, but Staff’s “b” should be “D.1.c” as shown above.

Regarding this question see applicant’s response on Page 2 of the Supplemental Comprehensive Plan Amendment Criteria. Staff assertion that the property is “not suitable for the proposed land use designation” is a conclusion based on opinion. See comments on Page 2 of the applicant’s response and the discussion of General Criteria A.3 found on Pages 3,4 &5 of this response.

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Staff's analysis and conclusions are without merit and not correct.

86-17

D.1.d – The proposed amendment does not materially affect the land uses and growth projections which are the basis for comprehensive planning, and reflects local circumstances in the County –

Note: Staff's "D.1.c." should be as recorded here: D.1.d.

See applicant's response on Page 2 & 3 to the Supplemental Comprehensive Plan Amendment Criteria.

Staff response essentially agrees with the discussion presented by the applicant, i.e. there is compliance with this criteria.

86-18

D.1.e – the proposed amendment does not materially affect the adequacy or availability of urban facilities and services to the immediate area or the overall areas of the urban growth area –

Note: Staff's "D.1.d." should be as recorded here: D.1.e.

See applicant's response on Page 3 to the Supplemental Comprehensive Plan Amendment Criteria.

Staff response essentially agrees with the discussion presented by the applicant, i.e. there is compliance with this criteria.

86-19

D.1.f – The proposed amendment is consistent with the GMA, Kitsap County-wide Planning Policy, state and local laws and other applicable inter-jurisdictional policies or agreements –

Note: Staff's "D.1.e." should be as recorded here: D.1.f.

Growth Management Act Planning Goals (RCW 36.70A.020)

Please note these goals are those that Kitsap County has to meet when their plan is adopted. These goals have already been satisfied when the defined Urban Growth Areas in 1998, 2006, and as they were revised in 2012 were adopted. Since the Sedgwick Partners' property is and has been located within Port Orchard's UGA in all three of those plans it is nearly pointless to use these goals to evaluate this kind of a change within a UGA.

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Urban Growth. Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.

Staff assessment and conclusions notes there is compliance with this goal.

(1) Reduce sprawl. Reduce the inappropriate conversion of undeveloped land into sprawling, low density development.

Staff assessment and conclusions notes there is compliance with this goal.

(2) Economic development. Encourage economic development throughout the state that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens of this state, especially for unemployed and for disadvantaged persons, promote the retention and expansion of existing businesses and recruitment of new businesses, recognize regional differences impacting economic development opportunities, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the state's natural resources, public services and public facilities.

Staff asserts that the proposed Sedgwick Partner's HTC Comprehensive Plan Amendment / Rezone proposal is supported by this goal, but goes on to comment that Port Orchard's UGA is oversized and that the proposed amendment is not supported by this goal. The Staff's arguments were refuted in the discussion of General Criteria A.3 and the applicant's response to Comprehensive Land Use Plan Element Policy LU-29.

Staff has expressed opinion in their findings which leads to a false conclusion.

86-21

Kitsap County-wide Planning Policies –

Please note the applicant's objection to the County-wide Planning Policies (CPPs) being part of analysis criteria as explained on Pages 3 & 4 of the applicant's response to the Supplemental Comprehensive Plan Amendment Criteria. Also to be referenced here is the e-mail transmitted to Katrina Knutson and Dave Greetham on November 17, 2015 providing further discussion of why the CPPs should not be used to evaluate Site Specific Comprehensive Plan Amendment? Rezone proposals. If Staff continues to use these policies as set forth in their staff report and they can subsequently defend the use of those policies as discussed in the November 17, 2015 mentioned above, **the applicant reserves the right to address** the Staff's compliance assessment either as contained in the November 9th staff report or as detailed in a response to that November 17th e-mail from W.M. PALMER CONSULTANTS.

86-22

Also note that County-wide Planning Policies (CPPs) are only to be employed as comprehensive plan framework criteria to judge that the County and the Cities have coordinated plans. Each of those jurisdictions have separately adopted CPPs, but none so far have tried to include them or portions of them in their respective comprehensive plans. **And that is a good thing** since the **so-called policies are mostly not policies at all**, they are written to be regulations with mandates like shall and must in the verbiage, but not codified as an ordinance. Just in the 2010-2011 amendments there are 118 instances when this has occurred. Many other so-called policy statements are laughable examples of meaningless platitudes.

86-23

2.a. Demonstration from the jurisdiction affiliated with the UGA that the proposal has the capability and capacity to provide urban level services to the area.

Note here the Staff returns to the assessment criteria as found in the application criteria.

The Staff states: *"The subject property is already within the Port Orchard UGA."* And *"However the City does not support approval of the amendment request as noted above."* Taking the first point, UGAs are not so designated without an analysis that leads to the conclusion that either the County or the adjacent jurisdiction has the capability and capacity to provide urban level services to the area. That fact has already been tested in the appeal of the County's 2006 Comprehensive Plan update and validated by the Growth Management Hearings Board following the adoption of the Revised 2006 Comprehensive Plan in 2012. Also, the underlying premise of UGA designation in GMA is that the entire UGA associated with a City will one day be annexed to that City. **So the issue of compliance with this criteria has been established without the necessity of a letter of concurrence from the City.**

86-24

Since there is apparently a letter from the City of Port Orchard providing comment on this amendment application, that letter or e-mail should have been sent to the applicant and included with the staff report. **Because neither took place, the applicant reserves the right to comment on the letter or e-mail after this response and before any public hearing date is set to consider this Site Specific Comprehensive Plan / Rezone amendment.**

Staff assessment is incomplete and conclusions drawn are without merit and incorrect.

2.b. Demonstration that the proposal is consistent with the associated urban growth area jurisdiction's Comprehensive plan –

Staff asserts: *"The City of Port Orchard does not support the amendment request as noted above."* And states: *"That the proposed amendment is inconsistent with the following Land Use Policy: POLU-5 Maintain and enhance single-family neighborhoods."* The issue of a letter/e-mail from the City of Port Orchard has been addressed in the response to 2.a. Regarding consistency with Policy POLU-5 the context of the area has to be considered. The site sits adjacent to Sedgwick Road and is in a different environment than the balance of the subdivision. When the subdivision was created in the mid 1980's there was no sewer service to this area and there had been no major road improvements to Sedgwick Road. In fact the State of Washington and Kitsap County had not yet consummated the trade between the old SR – 160 which use to be SE Mile Hill Drive and Southworth Drive and Sedgwick Road. Besides those two factors, the Fred Meyer complex had not been developed, the subsequent application of commercial zoning between Fred Meyer and the subject property had not occurred, Port Orchard had not annexed any property in the Bethel Corridor and sanitary sewer service had not been extended to the subject property (and not the balance of the subdivision). Thus, what looks like on the surface an isolated parcel proposed for commercial use is not a "whole story" analysis or conclusion.

86-25

Regarding Port Orchard's Policies POSK-23 "Maintain and enhance the single-family residential neighborhoods," POSK-38 "Maintain and strengthen existing commercial areas by focusing development within them and establishing development guidelines", and POSK-42 Discourage strip commercial land use development patterns and concentrate commercial/office development in pedestrian friendly centers," these policies too, when applied to the subject Comprehensive Plan Amendment / Rezone application have to be examined in light of the context of the area as mentioned above.

86-26

The applicant's response comments to Criteria A.3 are factors to be considered here as well and are repeated here for emphasis.

"Staff must take into consideration that a.) the subject property does lie adjacent to a major "transportation corridor" and b.) in this part of South Kitsap the issue of a "compact commercial area" is quite out of character with the Fred Meyer complex, the commercially zoned land between Fred Meyer and the subject property. The statement really does not reflect the ultimate goal of the Growth Management Act, and of Kitsap County which is, when all of the rhetoric is pared away....."pack-em" and "stack-em" all in urban areas. Well this amendment proposal fits that goal. The subject property is within an urban area (by definition), therefore the proposed amendment is **not contrary to** the County's goals for "coordinated planning."

86-27

Staff assessment and conclusions are incomplete because area context was not considered and therefor a finding of inconsistency with these policies is not supported.

3.c - Demonstration that the proposal meets the affiliated jurisdiction's transportation standards –

Aside from Staff's notation that the City does not support the request, see response to 2.a above, the Staff concludes that: "The rezoning of a relatively small parcel by itself is not anticipated to have significant adverse impacts on transportation. The proposal is included in the 2016 SEIS cumulative analysis of transportation."

86-28

See applicant's response on Pages 4& 5.

This criteria has been satisfied.

Based on the analysis and conclusions Staff has presented, which have been refuted, this response and the original application material, demonstrates the Bair proposed Rural Industrial Site Specific Comprehensive Plan Amendment / Rezone has met the criteria for approval.

86-29

Please allow the applicant to reply to any further Staff analysis and/or conclusions drawn, prior to submittal of document to the Planning Commission for Public Hearing. Also, clarification is needed to determine whether the comments contained in this letter are to be included in the response to the Draft Supplemental EIS, before the Final Supplemental EIS is published.

86-30

Thank you for the opportunity to respond to the Staff Report.

Sincerely,



William M. Palmer

W.M. PALMER CONSULTANTS

cc. Sedgwick Partners

Non residential

Permit Number: 15 00697 | Bair - Do not support the requested change

There is no impetus to change to Rural Industrial – industrial growth and development should occur in the underutilized industrial areas, not in the over utilized rural residential. “The subject property is not suitable for the proposed Land Use designation.”

88-1

Permit Number: 15 00522 | Bremerton West Ridge --- Do not support the requested change

The RI zone is not consistent with the Comprehensive Plan and the MRO is more consistent. industrial growth and development should occur in the underutilized industrial areas. There are likely Transportation and environmental impacts.

88-2

Permit Number: 15 00607 | Cornerstone Alliance Church -- Do not support the requested change

Under the current RR zoning, a place of worship is an allowed use. the current use as a church is not an allowed use under the proposed RI zone. If the proposed amendment is approved, the current use would become a nonconforming use. industrial growth and development should occur in the underutilized industrial areas.

88-3

Permit Number: 15 00378 | DJM Construction – Do not support the requested change

“The amendment request is not in the public interest as it would expand the logical outer boundary of the existing Type I LAMIRD boundary to include an undeveloped forested property with significant environmental constraints and building limitations.” We already have extensive LAMRIDs in North Kitsap that are not currently operating entirely within code – e.g., limbed up trees, signage on sides of buildings, signs in the bike access on bond road, types of businesses not appropriate for the rural business park, etc. Extending this large LAMRID would only make the existing situation more problematic.

88-4

Permit Number: 15 00725 | Tracyton Tavern – Maybe

“If additional parking is necessary to serve the surrounding area it may be in the public interest to approve the request.” Concerns about use actually being a parking lot since there are no services.

88-5

Permit Number: 15 00657 | Gonzalez – Maybe, weak case

It’s not a convincing case for me that additional LAMRID and industrial area is needed on Viking way when Poulsbo is attempting to fill a mostly vacant Viking way. – industrial growth and development should occur in the underutilized industrial areas,

88-6

Permit Number: 15 00740 | Laurier Enterprises, Inc. – Maybe – weak case

“A zone change to add commercial land would not be needed for capacity purposes under any Alternative. The subject property is currently within the Port Orchard UGA and is served by adequate public facilities and services to support new growth”

88-7

Permit Number: 15 00689 | Lee – Do not support the requested change

“The proposed project would develop 0.25 acres of the subject property. However, if approved the applicant would be able to develop the 17.84-acre property consistent with the allowed uses and development standards in the RCO District. The proposed amendment would expand rural commercial zoning along a highly traveled state highway.” This location is not at a stop light, or where there is currently (or an opportunity for) a turn lane. Traffic on Bond road – due to the Kingston ferry – often requires a wait of 3 to 5 minutes from side roads to merge on to Bond. This location is highly unsuitable for the proposed drive-thru coffee shop use. Commercial and industrial growth and development should occur in the underutilized

88-8

industrial/commercial areas, further, opening the entire 17 acres to commercial use would further undermine the comprehensive plan and rural character.

88-8
cont.

Permit Number: 15 00711 | Merlinco, LLC – Do not support the requested change

“The proposed amendment is inconsistent with this goal as it would increase commercial development intensity and capacity in the rural area for a property already developed as a single-family residential use. It would create a precedent to continue beyond historically developed commercial areas along a highway.” Commercial and industrial growth and development should occur in the underutilized industrial/commercial areas,

88-9

Permit Number: 15 00703 | Port Orchard Airport – Generally Support this change

“The proposed amendment will not result in significant adverse impacts on adopted level of service standards for public facilities and utilities. The airport use is existing. The existing zoning for the property already allows a wide range of commercial, industrial, and institutional uses and the development standards are the same between the existing and proposed zoning districts.” Established use

88-10

Permit Number: 15 00701 | Prigger – Do not support the requested change

“The proposal would not result in full utilization of existing industrial areas: The Central Kitsap UGA is currently adequately sized to accommodate the new employment target. According to Kitsap County maps the subject property contains moderate geologically hazardous area and a fish bearing stream.” Commercial and industrial growth and development should occur in the underutilized industrial/commercial areas,

88-11

Permit Number: 15 00736 | Rodgers -- Generally Support this change

“the site has been used as a nursery retail use for over 20 years and is already providing employment in the rural area.” Established use

88-12

Permit Number: 15 00380 | Ryan – Do not support the requested change

“The subject property and surrounding properties were rezoned from HTC to UR following completion of the Gorst Subarea Plan. The site has a high concentration of environmental constraints and is not suitable for the proposed HTC designation. The proposed amendment does not appear to be in the public interest.” Commercial and industrial growth and development should occur in the underutilized industrial/commercial areas,

88-13

Permit Number: 15 00739 | Schourup LLC – Maybe – weak case

“According to Kitsap County maps the site does have environmental constraints, but it appears they could be mitigated at the project level in accordance with the requirements of the Kitsap County Code. The subject property is currently flat and being used as a gravel parking lot in support of the adjacent industrial use. It both contains and abuts regulated wetlands and possesses hydric spoils that support potential wetlands. Any development that a rezone allows would be required to avoid, minimize and provide compensatory mitigation should there be unavoidable impacts”

88-14

Permit Number: 15 00735 | Sedgwick Partners – Do not support the requested change

“The proposed amendment does not appear to be in the public interest. Designating a single isolated single-family residential property for high-intensity commercial is contrary to the County’s goals for coordinated planning and focusing commercial growth in compact areas or along Transportation corridors with a concentration of commercial and mixed-use properties.”

88-15

Permit Number: 15 00550 | Unlimited – Generally Support this change

“The subject property is suitable for the requested Land Use designation and is consistent with adjacent properties that are already zoned RC. The site does have existing environmental constraints. Any proposed future development would require a wetland delineation and other related actions as required under Kitsap County Code Title 19 (Critical Areas). This would include any considerations required under Category II Critical Aquifer Recharge Areas under the same code title.”

88-16

Residential

Permit Number: 15 00641 | Curtiss Avery -- Do not support the requested change

” A zoning change to UL would allow a higher residential than currently allowed in URS zoning. Based on density allowances, there could be up to 16 dwelling units. This higher density will increase the demand on adopted level of service standards such as police, fire and emergency medical services. Higher density would also create more demand for Transportation maintenance and services to reach necessary services in the surrounding rural and urban communities. The site has not been specifically planned for sewer service by the County or City; sewer service was addressed broadly in 2006 in the evaluation of UGAs but specific sewer capital plans were not prepared for this site.” Bremerton has all the capacity needed for small SFR lots, and is stressed to provide services as is....

88-17

Permit Number: 15 00692 | Eldorado Hills, LLC – Maybe

“The County aims to focus a greater share of growth into the urban areas. The proposed amendment is consistent with this goal as it would encourage development capacity in the urban area if additional development capacity is need to accommodate growth targets. The request would require expanding the UGA boundary.”

88-18

Permit Number: 15 00737 | Edwards – Mountain View Meadows – Maybe, weak case

“The subject property is not suitable based on provision of utilities. With its existing uses, it is more compatible with surrounding areas with rural zoning designation and not with UL zone characteristics. However, it is adjacent to lands on the west and south that are more urban in character. The mapped wetland along the easterly edge would impact future development in that immediate location, but would not impact the majority of the property.”

88-19

Permit Number: 15 00738 | Fox – Harbor Rentals-- Do not support the requested change

” A zoning change to RR would double the amount of lots on the property, from 2 in the current RP zone to 4 in the proposed RR zone. This could potentially set a precedent of increasing residential density in the rural areas.”

88-20

Permit Number: 15 00686 | Garland – Do not support the requested change

“The proposed amendment is inconsistent with this goal as it would increase development capacity in the rural area and alter the existing and logical boundary for the RW Zoning District along SW Lake Flora Road.”

88-21

Permit Number: 15 00724 | Harris -- Maybe

“The proposed UL designation would change rural land to urban land and would require a UGA expansion. This would allow urban land development, uses, patterns and densities that are consistent with urban areas.” Needed for potential growth in central Kitsap??

88-22

Permit Number: 15 00714 | McCormick Land Company-- Do not support the requested change
“The proposed amendment would apply a designation that would provide for a rural character and allow development at rural densities but it would be a pattern similar those of abutting lands. Additionally, it would not support focusing development in urban areas. an increase in residential development on the applicant properties would create more demand for Transportation maintenance and services within this rural area to reach necessary services in the surrounding rural and urban communities. Because of its close proximity to the urban areas and city boundaries of Bremerton and Port Orchard, development in this area may encourage rural growth.”

88-23

Permit Number: 15 00461 | Porter— Support this change
“Reducing or eliminating split zones makes application of the plan and zoning more straightforward for the County and applicant. Therefore, reducing split zones is in the public interest where there are no other overriding considerations.”

88-24

Permit Number: 15 00722 | Royal Valley LLC- Support this change
”The proposal would meet the public interest by reinforcing the need for housing for the whole community.”

88-25

Permit Number: 15 00742 | Tallman -- Do not support the requested change
“Creating a new pocket of RR zoning may encourage more growth in rural areas whereas the County policies promote growth in urban areas.”

88-26

Permit Number: 15 00710 | Trophy Lake Golf Course --Support this change
“The proposed amendment is inconsistent with this goal as it would increase development capacity in the rural area. However, the proposed RR zoning would fit the current use of the property as a golf course, since the present use is prohibited under its current RW zoning. Further, the site has been highly altered for the golf course use.”

88-27

Linda L. Paralez, Ph.D.

Chico Business Park
C/O Jim Reed
1503 Lower Marine Dr.
Bremerton, WA 98312

Kitsap County
Community Development MS-36
614 Division Street
Port Orchard, WA 98366

December 7, 2015

RE: Comprehensive plan update comments.

To whom it may concern:

My name is Jim Reed I am the manager of Chico Business Park, LLC. I own the property located at 3663, 3665, 3667 Chico Way NW, Bremerton, WA 98312. Tax ID# 052401-3-101-2004, which is the focus of my comments.

The property described above has been zoned "HTC" for approximately 25 (+-) years, that is why the property was purchased, based on this zoning and the uses allowed in this zoning. It is also why a major investment was put into the development of this property.

90-1

The property was developed with three 5,000 sq. ft. Steel buildings designed for a variety of uses with no one specific end use intended but multiple uses based on the broad "HTC" zoning.

90-2

It has now come to my attention that this property within the last year or two has been down zoned to "RCO" with an extremely limited use within the zoning code, as well as it changing the intent of the use, to only provide services to the neighborhood that it is in. At no time have I ever been notified or informed in any way of the intent to change the zoning or the zoning change. The zoning change has completely removed the usability of this business park and its structures, based on the current land use. Accessary dwelling units, houses of worship, nurseries, daycares, and these types of uses are not conducive to a commercial business park with these type of structures. This limited land use that has been applied, has completely removed the usability, flexibility that the "HTC" zoning provided for a variety of tenants to be able to meet the obligations of this investment. The limited land use and the type of tenant that the "RCO" zoning allows would typically not pay the monthly square footage charge that would be required to meet the financial obligations of this type of business park. It appears there was no one involved in this zoning change that would have the experiential knowledge of the actual application of the "RCO" verse the "HTC" zoning and how it would affect the income stream of this type of structures/business park.

90-3

In the past I have done several developments with in Kitsap County. As part of the permitting process I have been required to provide a mailing list of landowners with in a 300' radius as well as mailing labels for those landowners, so that they may be notified of the proposed permitted project and make any comments concerning it.

90-3
cont.

It appears that Kitsap County operates on a double standard. They did not notify the landowners at any point with their proposed zoning changes, or the actual zoning change itself. It's hard to comment or make known ones position it they are never notified of any such proposal. I would assume that the law requires them to make public notice with in some printed document somewhere, and it most likely met the letter of the law, but it most certainly did not meet the intent of the law. The notification process that they are currently using is deeply flawed because I have not taken the newspaper in 20 years and I do not get the small papers that are delivered in your driveway. There are numerous sources of information available in this day and age, it does not appear that the current public notice process that Kitsap County is using is adequate. The Kitsap County Assessor's office does not seem to have any difficulty in informing me of when my taxes are due. I am confident that this property could have maintained its "HTC" zoning and the surrounding undeveloped properties could have been downzoned to "RCO" and that the County could have still met its requirements for the growth management act.

90-4

It appears what has happened here could be considered a "taking" or possibly a restraint of trade. It's almost inconceivable that with so much time under that zoning and that such a large investment has been made based on that zoning that some planner could come through and completely strip uses away and cripple if not completely remove a business parks ability to attract tenants that would pay the necessary monthly rental rates to support the investment that's been made.

90-5

With that, I would request that Kitsap County would restore in the 2016 comprehensive plan update, to the properties owned by Chico Business Park, LLC the "HTC" zoning that it had vested in for 25 +- years.

90-6

Confirmation of these comments would be appreciated.

Thank you,
Jim Reed, Manager
Chico Business Park, LLC.



POINT NO POINT TREATY COUNCIL

Port Gamble S'Klallam * Jamestown S'Klallam

December 8, 2015

David Greetham
Kitsap County Department of Community Development
Comprehensive Plan Update, Planning and Environmental Programs Division, DCD,
MS-36, 614 Division Street, Port Orchard, 98366

RE: Kitsap County Comprehensive Plan First Draft

Dear David Greetham,

Thank you for including the Point No Point Treaty Council (PNPTC) in your email distribution lists and giving us the opportunity to provide comments to the first draft of the Kitsap County Comprehensive Plan update, draft supplemental Environmental Impact Statement, and associated documents. The PNPTC provides natural resources management services to our member tribes—the Jamestown S’Klallam and the Port Gamble S’Klallam. Both tribes have an important stake in the protection of the marine and freshwater shorelines in Kitsap County, as our fisheries and shellfisheries depend on healthy, productive watersheds and nearshore environments. We are also very concerned about the development pressure within the county and how these changes will affect the natural resources therein. We appreciate the opportunity to provide more comments on various components as they are covered in more detail throughout this Comprehensive Plan update process. Also, thank you for providing us with 24 hours additional time due to my untimely illness (email from David Greetham, December 7, 2015).

91-1

On behalf of the Point No Point Treaty Council, we are submitting general comments to Kitsap County’s draft documents. In the Draft SEIS, the Point No Point Treaty Council supports Kitsap County’s Alternative 2 proposal, which directs the 20-year growth targets into compact UGA boundaries emphasizing mixed uses and higher densities in center and corridors, provided that some outstanding issues are addressed. Our member tribes support Alternative 2 over Alternative 3, particularly because Alternative 2 results in a 4% net reduction of UGA lands, while generally protecting the rural character of areas outside of the UGA boundaries. However, without specific detail on the development regulations for Alternative 2, we are unable to identify if the current draft SDEIS will be sufficient. We do not support Alternative 3.

91-2

Below are some general comments that we think should be addressed, updated or augmented in the final drafts of the proposed documents:

- Protecting historic and cultural resources, including archaeological resources, should be better addressed in the County's comprehensive planning for the next 20 years. In exhibit 2.16-13, it appears that the county plans to amend this element, however details of this have not yet been clearly described in the document. For example, project applicants should be required to consult with the Tribes and cultural organizations as part of the County's permitting process. 91-3
- Development regulations have not yet been released and our Tribes would like to review how specific goals and policies will be implemented. 91-4
- The Capital facilities document needs to provide a better plan for sewer for residences that are relying on outdated septic systems. Revisions should also include increasing solid waste capacity, additional sewer services, more storm water drainage systems, expanding water supply systems and increasing transportation services. 91-5
- The Comprehensive plan needs to give more information about the Transfer of Development Rights program. 91-6
- A final review of all the draft Comprehensive Plan documents (draft Capital Facilities plan, draft Supplemental Environmental Impact Statement, Buildable Lands, and all associated documents) need to occur specifically looking at inconsistencies and linkages between each of the documents. 91-7
- A general question for these plans: Has the County reviewed local and updated Salmon Recovery planning documents? For example, there may be some priority areas for protection for species of protected under the Salmon Recovery plans or other species of local interest such as bear and cougar. 91-8
- The plan has been reformatted compared to previous plans, which has taken a tremendous amount of effort. We applaud Kitsap County for taking on such an important task. However, are policy laws going to be hyperlinked in the final .PDF document? As a reviewer, I found it challenging to find specific policy regulations as they are presented in the original policy documents and the links to different/associated documents that some of the documents referred to. Perhaps the County should include a policy matrix that provides those hyperlinks for ease of reference somewhere in the Kitsap Comprehensive Plan document. 91-9
- Climate Change has not been adequately addressed in these documents. While Climate Change is mentioned in several places for the goals and policies throughout the Comprehensive Plan Update, little evidence of how Climate Change Plans and preparation will be implemented, monitored and evaluated. Our Tribes are currently working very hard on their own reservations and Usual and Accustomed areas, to see how resources will be affected in lieu of climate change impacts, and it seems paramount that phenomenon such as rising sea levels, increasing flood events, changing temperature regimes such as higher incidence of drought (causing rivers to stay dry longer), and other elements need to be included to address local climate change impacts. Additionally, preparing for the effects on key elements such as storm water, waste water, emergency services, flooding and other vulnerable areas, needs to be addressed with a clear plan of action. 91-10

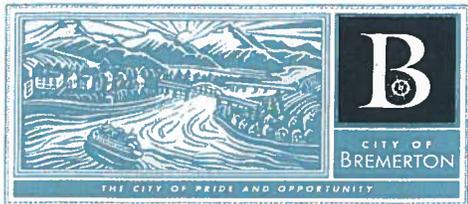
- Site specific re-zone requests: While we were not able to carefully review each of these requests, it is essential that a thorough investigation of all the affected resources is systematically reviewed to ensure that these re-zones do not fall on habitat areas that include species of concern, building in the FEMA 100 year flood plain, or are not contrary to the existing regulations under the current GMA, SMP and CAO regulations.

Again, thank you for considering PNPTC's comments on these draft documents. We look forward to reviewing the next versions of the Comprehensive Plan Update and its associated documents. If you have any questions regarding these comments, feel free to contact me at 360-297-6534 or at crossi@pnptc.org.

Sincerely,



Cynthia Rossi
Lead Habitat Biologist
Point No Point Treaty Council



Department of Community Development
345 6th Street, Suite 600
Bremerton, WA 98337-1873
Telephone: 360-473-5845
Fax: 360-473-5278
Allison.Satter@ci.bremerton.wa.us

Allison Satter, Senior Planner

December 7, 2015

David Greetham and Steve Heacock
Kitsap County Department of Community Development
614 Division St
Port Orchard, WA 98366

re: Kitsap County 2016 Comprehensive Plan Update – City of Bremerton Comments

Dear Mr. Greetham and Mr. Heacock:

The City of Bremerton provides the following comments on the Kitsap County Working Draft Comprehensive Plan Update released in November 2015. We thank you for the opportunity to review and comment on your draft document and we hope that these comments will be addressed in the County’s next published document.

1) Chapter 8: Subarea Plans.

- a) This section does not make reference to the Gorst Subarea Plan, though it is mentioned to be adopted within the Environmental Review. For clarification, the city recommends an introduction section to Chapter 8 that mentions the Subarea Plans that will be adopted by reference.

92-1

2) Environmental Review:

- a) Exhibit 2.6-21 Alternative 1. No Action Growth Assumptions has identified City of Bremerton target population and employment targets. However, Alternative 2 and 3 corresponding charts (Exhibit 2.6-28 and 2.6-35) has a revised number for the Growth Assumption within the City of Bremerton limits. The City is concerned that the proposed alternative affects the assumed population growth and employment target within City limits (example: Alternative 1 has a growth assumption in the City limits of 13,757 people, but Alternative 2 and 3 has a growth assumption in the City limits of 12,985).
- b) Exhibit 2.6-22, 2.6-29 and 2.6-36. UGA Capacities and Target. It is difficult to discern different proposals and their impact to the population (with relation to capacity and targets). City is requesting individual data charts be provided for each UGA, as the summarized capacity is hard to track. The City would like to support the proposed Alternative that has similar population and employment target to our capacity.
- c) Appendix B. Exhibit 4: Regional Growth Centers and Manufacturing Centers Map. The Puget Sound Industrial Center-Bremerton (formerly South Kitsap Industrial Area)

92-2

92-3

92-4

Manufacturing Industrial Center (MIC), as identified by Puget Sound Regional Council (PSRC), has been left off the map.

92-4
cont.

3) Urban Growth Areas (UGAs):

a) East Bremerton UGA:

- i) The City is supportive of the Alternative 1 or 3 for the area near Enetai as it proposes densities (1-5 dwelling units/acre) that could support the investment and construction of new capital facilities. This directly correlates with the proposed CapF and Utilities Policy 19 which is to *consider appropriate land use and zoning map amendments if funding for capital facilities fall short of expectations or if levels of service cannot be adjusted to compensate for any shortfall*. If this area is designated as Alternative 2 proposes (1-4 dwelling units/acres), it is likely that the City would struggle to find funding for the capital facilities needs for this area as there will be inadequate density to support capital projects.
- ii) The City is generally supportive of Alternative 2 or 3 with the proposal to remove a portion of the East Bremerton UGAs southwest of Riddell Road. The City is supportive as this reduction in the East Bremerton UGA allows the expansion for public service delivery in the West Bremerton UGA. However, as Comment 2(b) in the Environmental Review mentions, further information on the targeted population for this revision may affect the size of these reductions and expansions and we cannot fully weigh in on the proposal until we see the data analysis.

92-5

92-6

b) West Bremerton UGA:

- i) The City is supportive of Alternative 2 or 3 with the expansion of the West Bremerton UGA for the northern and southern areas of Kitsap Lake for public service delivery. However, as Comment 2(b) in the Environmental Review mentions, further information on the targeted population for this revision may affect the size of this expansions and we cannot fully weigh in on the proposal until we see the data analysis.
- ii) The City is not supportive of the Alternative 3 to increase in density (Urban Medium Residential, 10-18 Dwelling units per acre) within Rocky Point and West Hills. The UGAs would have a higher density than permitted by the City in the surrounding area (which is Low Density Residential 5-10 dwelling units per acre). This proposal contradicts the City's strategic planning efforts to encourage population to the Centers.
- iii) The City is supportive of the change from Industrial to Urban Low Residential within Navy Yard City as the City is proposing similar proposals within that vicinity with the City's Draft Comprehensive Plan Update.

92-7

92-8

92-9

c) Gorst UGA:

- i) The City is supportive of Alternative 2 for the Gorst UGA. | 92-10
- ii) Within the Draft SEIS page 4-20 discusses Ryan's proposal (4.2.21) which seems to be near the Gorst UGA. More information is needed in order to clarify the City's position for 4.2.21. Without a correlating map or parcel numbers, staff was unable to verify the proposed location.

92-11

d) Watershed:

- i) The City of Bremerton has acquired land within County jurisdiction that is adjacent to City of Bremerton limits for our Watershed Management. The City requested that the area be designated to the City of Bremerton and can be seen in the document attached to this letter. The West Bremerton UGA map shows a portion of the area in question, however it does not appear to be assigned to a UGA. The City is requesting that the area around the City watershed be designated to the City of Bremerton for future annexation for municipal services.

92-12

e) Central Kitsap UGA:

For more than 10 years, and on multiple occasions, the City of Bremerton has been requesting that the Central Kitsap UGA be associated to the City of Bremerton. As stated in our most recent letter dated April 23, 2015 we believe that the common goals that should be reflected in both the County and City Comprehensive Plans should be the association of all UGAs that are adjacent to the City of Bremerton.

92-13

We again formally request that the Central Kitsap UGA be associated with the City of Bremerton. By associating this UGA to the City of Bremerton, Kitsap County would finally meet the expectations that the County agreed to in the 2005 GMA Settlement agreement that the County agreed to associate unassociated UGAs.

Specifics comments about the CK UGA are:

- i) The environmental review (page 2-65) makes reference in Alternative 3 to the Central Kitsap UGA boundaries being increased along Barker Creek and north SR 303 causing the UGA boundaries to abut Silverdale and Central Kitsap. The City is not supportive of this portion of Alternative 3 to connect Silverdale and Central Kitsap.
- ii) In 2015, the Kitsap Countywide Planning Policies were amended to shift population away from CK UGA and reallocated into Silverdale to accommodate the area needed for the growth expectations as a regional growth center. The CK UGA should not be expanded to accommodate sprawling growth as proposed in Alternative 3.
- iii) As identified by the Countywide Planning Policies, County and Cities shall have separate urban areas by creating and preserving a permanent network of urban and rural open space, and critical areas. By connecting CK UGA to Silverdale, this has removed a critical area separator (Barker Creek). This stream corridor should be protected and encouraged to remain protected through County's designation. The CK UGA should not be expanded as the proposal conflicts with the Countywide Planning Policies.
- iv) If the County has determined that the CK UGA does need to be expanded, the area removed from the CK UGA north of Riddell in Alternative 3 is a better candidate for growth. The subject area exhibits a more intense urban development pattern, with less critical areas present than lands near Barker Creek, and therefore should be considered to remain in the CK UGA before Barker Creek is considered to be added.

92-14

December 7, 2015

City of Bremerton Response to Kitsap County Draft Comprehensive Plan

Thank you for the opportunity to comment. Please notify us of any action taken with respect to this document. If you have any questions or need additional information, please contact me at 360-473-5845.

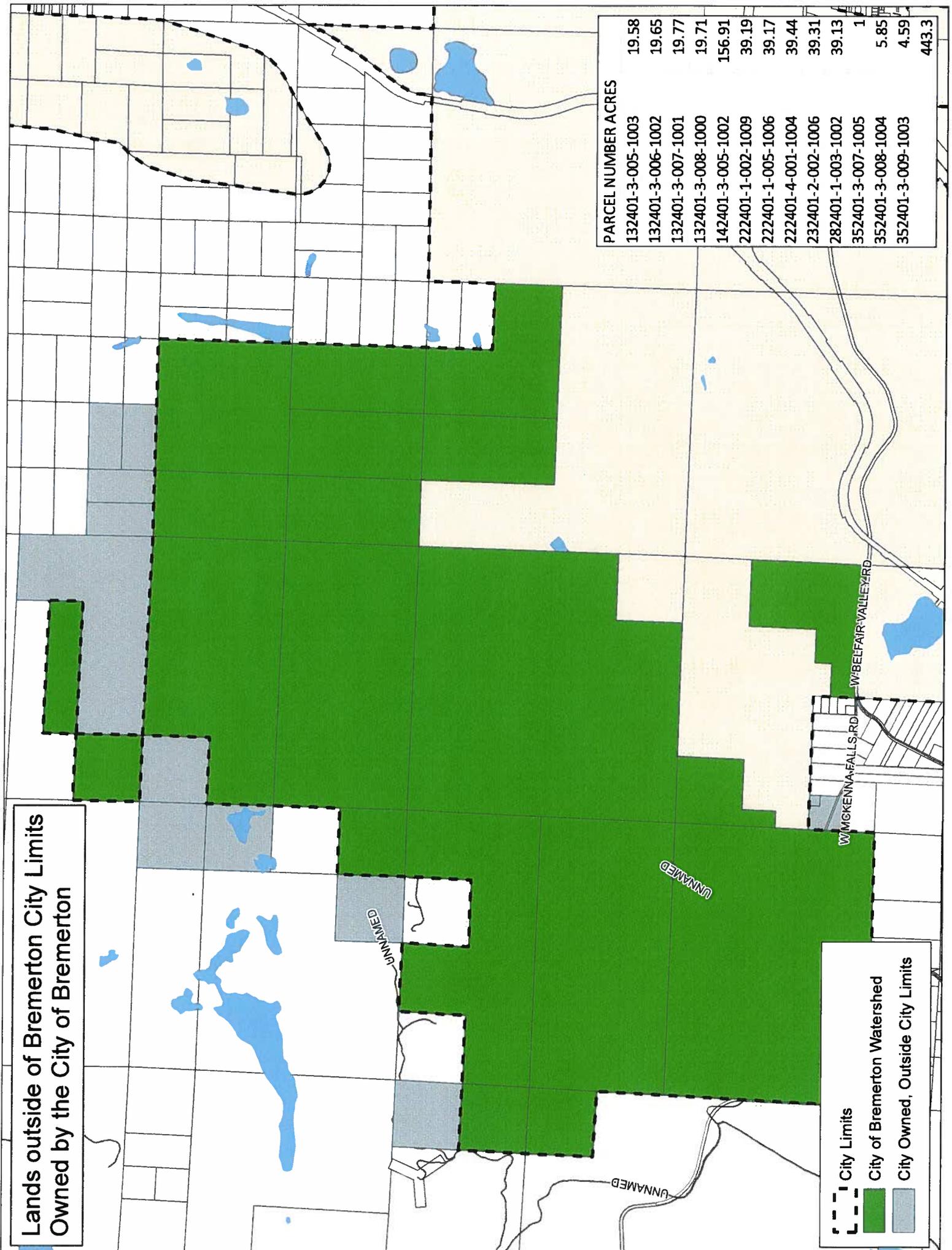
Respectfully,

A handwritten signature in purple ink, appearing to read "A Satter".

Allison Satter
Senior Planner

cc: file; COB Legal Department

**Lands outside of Bremerton City Limits
Owned by the City of Bremerton**



PARCEL NUMBER	ACRES
132401-3-005-1003	19.58
132401-3-006-1002	19.65
132401-3-007-1001	19.77
132401-3-008-1000	19.71
142401-3-005-1002	156.91
222401-1-002-1009	39.19
222401-1-005-1006	39.17
222401-4-001-1004	39.44
232401-2-002-1006	39.31
282401-1-003-1002	39.13
352401-3-007-1005	1
352401-3-008-1004	5.85
352401-3-009-1003	4.59
	443.3

Legend

- City Limits
- City of Bremerton Watershed
- City Owned, Outside City Limits

W BELFAIR VALLEY RD
W MCKENNA FALLS RD

UNNAMED

UNNAMED

UNNAMED



LAW OFFICE OF
RICHARD B. SHATTUCK
4102 NW ANDERSON HILL RD.
SILVERDALE, WA 98383

shattucklaw@earthlink.net
TELEPHONE: (360) 698-5560
FAX: (360) 698-5569

November 17, 2015

VIA E-MAIL & REGULAR MAIL

The Honorable Edward E. Wolfe
Commissioners' Office, MS-4
614 Division Street
Port Orchard, Washington 98366

RE: Comment on Comprehensive Plan Amendment for Silverdale Subarea

Dear Commissioner Wolfe:

I want to thank you and the Department of Community Development for hosting the "open house" on the update to the Comprehensive Plan in Silverdale last evening. Staff did a great job of presenting the Plan.

I need to touch base with you directly at this stage in the Comprehensive Plan process to make sure you are aware of a proposed zoning designation for the West Hills area of Silverdale that will continue to allow this area to suffer decay.

Since 2005, the West Hills area, generally known as the "Silverdale Loop" and the area across from Central Kitsap High School along Anderson Hill Road, has been designated as a "Mixed Use" zone. While this zoning may have had some appeal during the "go-go" real estate boom of the mid 2000's, there is no market for such zoning presently. The result of this zoning, however, has been the growth of the closest thing to urban decay in Silverdale. I am sure you have observed the houses that have had roofs falling in along Anderson Hill Road directly across from the high school – an area that is one of the "gateways" into Silverdale. When zoning is incompatible with the market, property owners are left with taking "no action" in the hope that someday the market will catch up, and they cannot develop property in a way that reflects the market. The result, of course, is what we are seeing along Anderson Hill Road today.

95-1

While staff has recognized the absence of a market for "Mixed Use", both of its planning alternatives for Silverdale burden this area with a designation that continues to be wholly inappropriate. Both Alternative Two and Alternative Three to the Plan shift this entire area to a zone of "Urban High" – requiring the construction of between 19 and 30 units per acre.

Commissioner Wolfe, I challenge you to consider the physical aspects of the area that is being designated for such a zone. A salmon bearing stream, requiring a buffer of 150 feet plus a construction setback of 15 feet, flows through this property. Part of the area rests in a flood plain and other parts are moderate geologic hazardous areas. Anderson Hill Road between the roundabout and Bucklin Hill has to be close to a Level of Service F as the result of traffic associated with the high school. Given the buffer and setback from the creek, it will be very difficult to expand the road onto private property. With the topography in the "Silverdale Loop" and the conditions of roads within the Loop, I cannot think of a more challenging area in the Silverdale Urban Growth Area for such intense development. Particularly along Anderson Hill Road, "Urban High" simply does not fit. I am enclosing a map of the Anderson Hill Road corridor that generally shows the buffer and setback.

Rather than recognize the extraordinary challenges associated with any development in this area (much less Urban High development), the County is imposing a designation that will lead to further decay in this corridor. Given the obvious problems associated with placing such an intense development in an area that will not support it, I can only assume this is being done so there is not a down zoning of the only area designated for Urban High development within the Silverdale Urban Growth Area. I would expect a down zoning to a more compatible Urban Medium or Urban Low might require some expansion of the Urban Growth Area to accommodate the growth that was designated for West Hills. Commissioner Wolfe, a simple question: Is this planning for the future of Silverdale, or is it an easy response to help ensure that the Comprehensive Plan is compliant after the next Comprehensive Plan update is adopted?

I ask that you challenge staff with regard to the physical suitability for Urban High development in this area given the environmental and traffic constraints, and ask the question of how this area is going to look for the next 10 years if, in fact, there is no market at this location for such development.

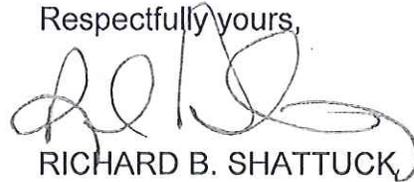
During the open house, staff did offer two responses to these concerns. First, it was noted that the County does have the option of updating the Comprehensive Plan once each year. As we both know, the likelihood of the County reopening the Comprehensive Plan to significantly down zone an area of Silverdale is close to zero. Second, staff noted that, with Silverdale designated a Regional Center, Urban High development can take place within commercial zones. I agree with this analysis, but it only confirms the questionable decision to burden the West Hills area of Silverdale with Urban High zoning when such development is likely to take place, if at all, at other locations in Silverdale.

95-1
Cont.

The Honorable Edward E. Wolfe
11/17/2015
Page - 3

Thank you for your attention to this matter. I ask that this letter be included as a comment to the Comprehensive Plan update process.

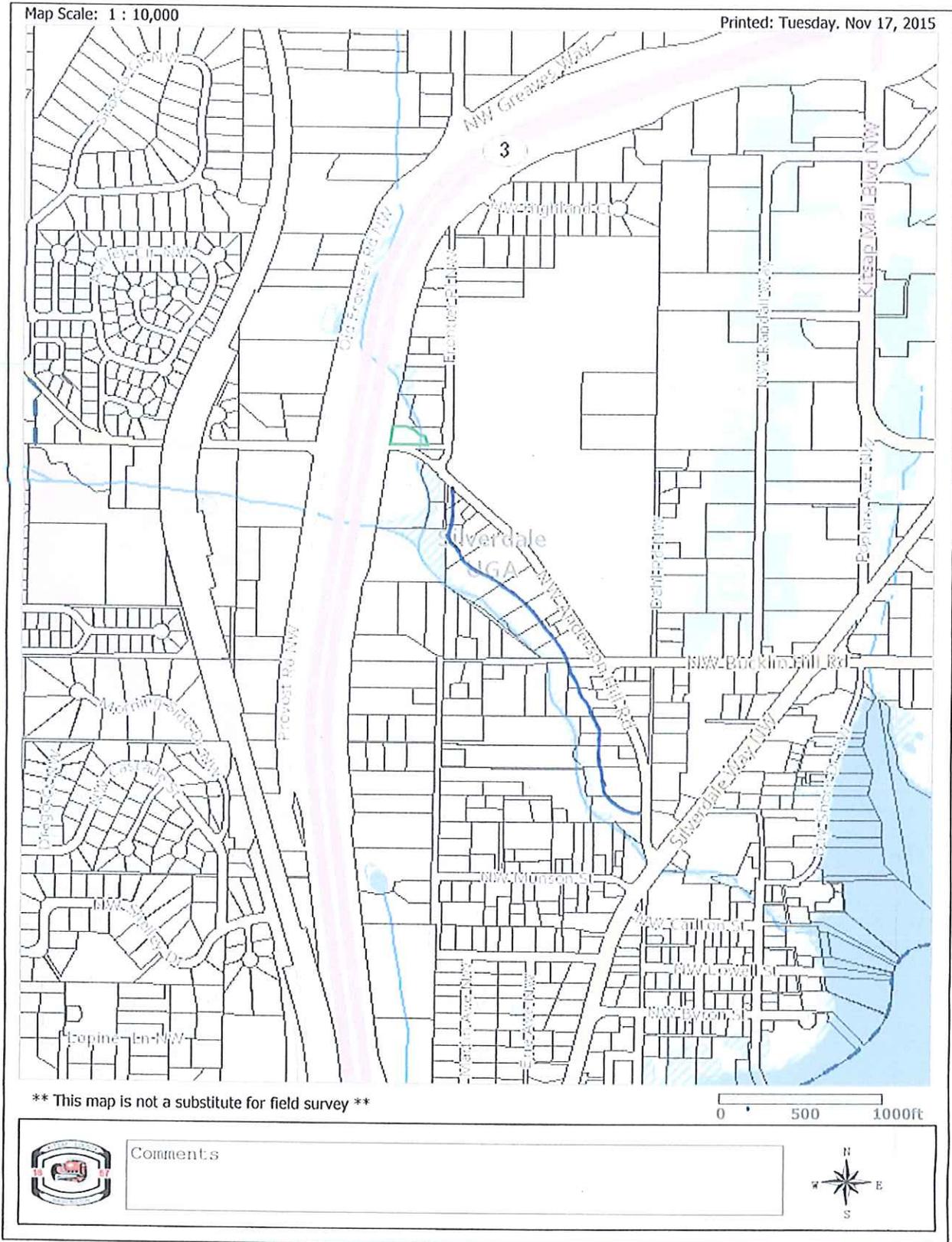
Respectfully yours,

A handwritten signature in black ink, appearing to read 'R. Shattuck', written over the typed name below.

RICHARD B. SHATTUCK

RBS/jef

cc: Larry Keeton, Director, Dept. of Community Development
Patty Charnas, Planning Manager, Dept. of Community Development
Dave Greetham, Planner Supervisor, Dept. of Community Development
Kay Wilson Fisk, President, Central Kitsap Community Council



December 1, 2015

David Greetham, Planning Supervisor
Kitsap County Department of Community Development
614 Division Street MS - 36
Port Orchard, WA 98366

RE: Comments on the 2016-2026 Draft Comprehensive Plan regarding
Tax Parcel Numbers 072302-2-022-2002 and 072302-2-024-2008

Dear Mr. Greetham,

As Jim Peschek discussed with you recently, I am concern about the discrepancies in the zoning classifications for the parcels I own on Phillips Road. As part of the comprehensive plan update I recommend that the zoning classifications for tax parcels 072302-2-022-2002 and 072302-2-024-2008 be reclassified as Urban Low Residential. This would be consistent with the zoning classification of the other parcel I own along Phillips Road.

My ownership includes the following parcels: 072302-2-001-2005, -2-022-2000, -2-015-2009, -2-023-2009, -2-024-2008, -2-025-2007, -2-026-2006, and -3-002-2002. These parcels were approved for the Higgins Preliminary plat in February 2011. It was awkward to work through the density calculations between the two zones. The urban restrictive zoning did not provide any additional protections to the critical areas that were not addressed through the critical area studies and the buffers and setbacks that were established for this preliminary plat. My reasons for this request are listed as follows:

1. There is no obvious reason why two of the eight parcels are zoned differently as they all possess the similar topographic and hydraulic characteristics.
2. The parcels are all one ownership and will likely be developed as one project. Even if some parcels are developed separately, there would be a mixture of two zones to account for in any land use application. This makes the process unnecessarily complicated and confusing to all stake holders.
3. As demonstrated in the approval process for the Higgins Preliminary Plat, the Critical Area Ordinance provides the necessary safeguards required to protect environmentally sensitive areas located on these parcels.

96-1

I appreciate your consideration and hope that all eight parcels will be classified as Urban Low Residential. Please contact Jim Peschek at 253-405-0250, or myself at 253-988-0869 for any questions. And please, keep us informed of the County's decision.

Sincerely,



Richard Shaw

RECEIVED

DEC 02 2015

Kitsap County
Dept of Community Development

Comment 1

The site reclassification application is a request to clean up an existing situation of “island zoning”. The property is a discontinuous area of Rural Wooded zoning located within the Rural Community of Sunnyslope (an area already characterized by rural lots less than five acres in size), directly adjacent to the City of Bremerton, homes built on 1/3 acre size lots, and the Coulter Creek Heritage Park.

98-1

Comment 2

As recognized in the staff report, the request does not change the overall population allocated to the rural area. This request is in recognition of the changes that have occurred in the area since the comp plan was adopted. Changed circumstances include:

98-2

- The forming of the adjacent Coulter Creek Heritage Park
- The adoption of the McCormick Urban Village sub-area plan,
- The annexation of the adjacent industrial land by the City of Bremerton
- The build out of the adjacent 1/3 acre home sites to the north.

Comment 3

The staff report seems to have a general theme of viewing the request as a proposal to rezone from Natural Resource Land to Residential Land. The property is already zoned for residential use - that the property is enrolled in a current use tax program has no bearing on a property's future land use, as noted in the Porter reclassification request. The property is expected to convert from its current use, as is other undeveloped property zoned for residential use – enrollment in a current use tax program has no influence on its future use.

98-3

Comment 4

The staff report on page 8 states that the proposal does not support GMA goals 1, 2, 8, 9, and 10. This is not accurate as outlined below:

1) Urban growth. Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.

98-4

The proposal does not require any additional population allocation to the rural area and maintains rural development consistent with Chapter 3 of the Comprehensive Plan. The proposal does not preclude the county's encouragement of development in the urban areas via reasonable measures and other techniques.

(2) Reduce sprawl. Reduce the inappropriate conversion of undeveloped land into sprawling, low-density development.

This goal is not applicable, in that the proposal is in the rural area and requests a change from one rural lot size to different rural lot size, consistent with Chapter 3 of the Comprehensive Plan. Sprawl as used in the GMA is considered the type of development between urban and rural – neither urban in nature nor rural in nature. The proposal is for rural lot sizes.

(8) Natural resource industries. Maintain and enhance natural resource-based industries, including productive timber, agricultural, and fisheries industries. Encourage the conservation of productive forest lands and productive agricultural lands, and discourage incompatible uses.

The proposal has no impact on natural resource based industries in Kitsap County. The property is currently zoned residential – it is anticipated that it will be developed for residential use. The proposal has no impact on the quantity of resource lands in Kitsap County. As noted on Exhibit 3.2-11 of the draft SEIS, this proposal avoids designated resource lands.

(9) Open space and recreation. Retain open space, enhance recreational opportunities, conserve fish and wildlife habitat, increase access to natural resource lands and water, and develop parks and recreation facilities.

The proposal has no impact on open space and recreation as the property is already zoned residential. In the future, there may be an opportunity for additional open space, based on the sub-division rules in place at the time of sub-division application.

It is noted that there is significant existing open space in the immediate vicinity- the property is adjacent to approximately 1,400 acres of County owned open space and recreational opportunities, including opportunities or fish and wildlife habitat.

(10) Environment. Protect the environment and enhance the state's high quality of life, including air and water quality, and the availability of water.

Any future sub-division and development will have to comply with all County critical area requirements and any other federal, state and local rules and regulations that are in place to provide such protection, including air, water quality, and the availability of water. As stated in Exhibit 3.2-11 of the draft SEIS, critical area regulations would guide development.

Comment 5

For questions 4a and 4b on page 9, the staff report provides commentary that is not in response to the questions and is not applicable. The answer to 4a should be limited to the question asked and read "The proposed amendment does not substantially affect the rural / urban population balance". The proper response to 4b, in that the question only applies only to requests for natural resource lands, is "Not Applicable". Current tax status is not part of the established criteria.

Comment 6

A general overall comment for all reclassification requests – unlike in years past, in the current process the "un-meet need" and the "compelling reason" criteria of yester-year for site specifics are not applicable. Not only were those very ill-defined concepts excluded from the reclassification application criteria, they have also been removed from title 21 for site specific applications.

Sincerely,

Doug Skrobut

McCormick Land Company

98-4
cont.

98-5

98-6

12/7/15

DEAR KITSAP COUNTY COMMISSIONERS

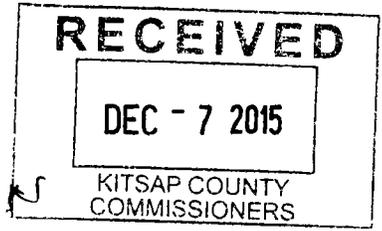


AS A PROPERTY OWNER ON BETHEL AVENUE IN PORT ORCHARD, I WOULD LIKE TO URGE YOU TO NOT MAKE ANY CHANGES TO THE URBAN GROWTH BOUNDARIES IN THE BETHEL CORRIDOR. MY PROPERTIES WOULD BE SEVERELY AFFECTED BY ANY CHANGES!

99-1

THANKS,

JON MICHAEL STOICAN
360-620-3607



(1588 SE OREGON ST
1598 SE OREGON ST)

RECEIVED

Letter 102

Kitsap County and Dept. of Community Development

DEC 07 2015

12-07-2015

Robert Waters

Kitsap County
Dept of Community Development

5163 Bethel Road SE

Port Orchard WA 98367

Regarding: Reallocating Commercial property from South Kitsap to Central and North Kitsap.

I am totally opposed to this process, I have been involved with the GMA and the zoning process in our county for 20 plus years. There have been extensive processes throughout the years to have the current zoning in place. Changing the zoning will deter those plans that took years of planning with public involvement, not to mention the monetary damages that individual's such as myself will incur. I requested in writing and testified at many meetings throughout the years, asking that my property at the above address be zoned commercial. My property did receive commercial zoning with due process that took years and years, due to the GMA being remanded and all of the bureaucracy. Now I am shocked to hear that once again the County is attempting to take away commercial zoning in South Kitsap only to give it to Central and North Kitsap to allow more Mall Space and to appease the Silverdale proponents of City Incorporation. All the while the County which was to implement the Bethel corridor sat on their heels. I was a member of the planning meetings and saw the renderings of the proposed corridor sometime in the nineties, we waited and waited no leadership, no corridor, what a loss. This was all way prior to any talk of the City of Port Orchard or McCormick woods expansion. It is common knowledge that current South Kitsap commissioner has a no growth agenda, that is why there is no Target or Home Depot etc. in South Kitsap. In order for South Kitsap to grow we will need the current planned commercial zoned property to be maintained as is, not preyed upon because growth has been pushed by a few individuals to other parts of the County. I find it irresponsible that I found out today, the last day to offer testimony that all this was happening due to a friend phoning me, why didn't the County inform that they were planning on downzoning my property that I have been paying taxes based on high commercial values for over a decade and you are planning on taking that away without fair notice or compensation.

102-1

PS: My tax Parcels for the above addresses are as follows, 122301-2-035-2009 and 122301-2-035-2108

Sincerely,

Robert Waters



