

Comprehensive Plan Comment Matrix - Comments Received through 4:30 p.m. April 11

Comment #	Date Received	Name	Category	Subcategories	Text
1	12/26/2023	Kelly Roberts	DDR	Infrastructure, Code	<p>Re: 17.105.110 revisions</p> <p>Simply adding the language "downward and" to the code does not go far enough concerning existing development, especially in the rural residential zone where illumination is more intense. MANY people have downward-directed luminaires, yet the light emittance is still an assault on the senses, is an invasion of privacy, and disturbs the peace of surrounding property owners, all of that as a result of light trespass. You need to have more measurable language that requires responsible lighting practices to go beyond a physical placement, such as lower lumens (800 or less)/warmer bulb temperatures (2700K or less) and full shielding to prevent anything beyond the area to be lit, worst case scenario anything beyond the 60 degree glare limit, to "prevent light pollution of the night sky" (as noted in 17.420.030C revisions).</p> <p>*Note: Look around and you will see downward-directed exterior lighting that goes well beyond the one footcandle limit which, by the way, needs to be appropriately measured at the center of the source of the light shining out - may need to use a ladder - and not from the ground.</p> <p>Re: 17.420.030C revisions</p> <p>While it is very good to include both "downward or"... "and shielded from above to prevent light pollution of the night sky," this too needs more measurable language.</p>
2	12/26/2024	Rev. Conrad Lampan	Comp Plan	Land Use, Site Specific	<p><a href="#">See pages 1-11</a></p>
3	1/4/2024	Ann Schnitzer	Comp Plan	Comp Plan Edits	<p>Good Morning,</p> <p>I am the owner of the Port Orchard Airport in which our property is under a LAMIRD. On page 51 of the 2024 Comp Plan Draft, under the Port Orchard Airport title, it states the site is served by private wells. This is incorrect, our property is now served by a public Water system. Please make this correction.</p> <p>Thank you.</p>
					<p>Table 1.5 Comprehensive Plan Land Use Designations</p> <p>1. Add a new permanent classification "Rural Residential Protection and (RRP)" for Zoning-Alternative 2 and 3 and Appendix F - All Parcels designated RR Rural Residential that border or are adjacent to the Kitsap County Port Gamble Heritage Park (Park) or have streams or intermittent streams shall be re-designated RRP for Rural Residential Protection. This should be done to better protect the Park, streams, unnamed streams, seasonal streams, "DNR Type S, F, NP, and N streams".</p> <p>2. Add a new permanent classification "Rural Wooded Protection and (RWP)" for Zoning-Alternative 2 and 3 and Appendix F - "All Parcels designated RW Rural Wooded that border or are adjacent to the Kitsap County Port Gamble Heritage Park (Park) or have streams shall be re-designated RWP for Rural Wooded Protection. This should be done to better protect the Park, streams, unnamed streams, seasonal streams, "DNR Type S, F, NP, and N streams".</p> <p>Figure 1.1. and Figure 1.2 Commissioner District 1 (North Kitsap) Zoning Map, Alternative 2 &amp; 3 - Commissioner District 1 North Kitsap Alternatives 2 and 3 Maps should be modified to indicate all streams and provide a link to the detailed interactive map with streams.</p> <p>Figure 1.3. and Figure 1.4. Commissioner District 2 (South Kitsap) Zoning Map, Alternative 2 &amp; 3 - Commissioner District 2 South Kitsap Alternatives 2 and 3 Maps should be modified to indicate all streams and provide a link to the detailed interactive map with streams.</p>

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4	1/8/2024	Thomas Garrett	Land Use Element	Land Use, Environmental	<p>Figure 1.5. and Figure 1.6. Commissioner District 3 (Central Kitsap) Zoning Map, Alternative 2 &amp; 3 - Commissioner District 3 Central Kitsap Alternatives 2 and 3 Maps should be modified to indicate all streams and provide a link to the detailed interactive map with streams.</p> <p>General Land Use Goals, Policies an Strategies/Rural Designations/Table 1.7 Kitsap County’s Rural Land Use Designations</p> <p>1. Add a new permanent classification "Rural Residential Protection and (RRP)" for Zoning-Alternative 2 and 3 and Appendix F - All Parcels designated RR Rural Residential that border or are adjacent to the Kitsap County Port Gamble Heritage Park (Park) or have streams or intermittent streams shall be re-designated RRP for Rural Residential Protection. This should be done to better protect the Park, streams, unnamed streams, seasonal streams, "DNR Type S, F, NP, and N streams".</p> <p>2. Add a new permanent classification "Rural Wooded Protection and (RWP)" for Zoning-Alternative 2 and 3 and Appendix F - "All Parcels designated RW Rural Wooded that border or are adjacent to the Kitsap County Port Gamble Heritage Park (Park) or have streams shall be re-designated RWP for Rural Wooded Protection. This should be done to better protect the Park, streams, unnamed streams, seasonal streams, "DNR Type S, F, NP, and N streams".</p> <p>Parks, Recreation, and Open Space Goals, Policies and Strategies/Parks Goal 4. Access Add - All Private Parcels that border or are adjacent to the Kitsap County Port Gamble Heritage Park (Park) shall have no legal access to the Park from their private property. This would prevent encroachment, wildfires and any other unnecessary damage to the Park. Only Kitsap County designated and approved access roads/trails will be used for all park visitors.</p>
5	1/8/2024	Carol Kaufman	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Dear Katie Walters,</p> <p>I am writing to you in regards to the 400-acre property north of Bond Road and adjacent to the Port Gamble Forest Heritage Park. I am opposed to this development which includes the proposed housing development and YMCA sports park. It conflicts with the mandates of the Growth Management Act and would be a detriment to this unique, natural environment that we all love and cherish. This area is worth preserving for generations to come.</p> <p>Many of us hope you share our concern and will not give in to more development in this sensitive area of the County.</p> <p>Sincerely, Carol Kaufman</p>
6	1/9/2024	Susan Fox	Climate Change Element	Land Use, Environmental	<p>Small rural regenerative farms are critical to our efforts with climate change and for our community health. Regenerative farms that do no till, use crop covers, mulching and plant rotation along with pasturing of farm animals create healthy soil that captures carbon, retains water, and produces higher yields in a thriving eco system. Regenerative farming is being done on small scale all over the world. More and more farmers are learning the tremendous benefits of this.</p> <p>Industrial farming destroys the soil, water, air and eco-systems. Civilizations have collapsed throughout history due to poor farming practices. I first learned this in Guatemala when I ask an archaeologist why the Maya civilization collapsed. They could no longer grow food due to erosion from tilling and deforestation. Just look at rural towns in the U.S. that were devastated by large industrial farming.</p> <p>Please listen to regenerative farmers and not people who are profit driven only. It's a matter of survival for all of us.</p> <p>Thank you, Susan Fox founder of Robust Soil, Robust Health, Robust Community Group Network</p>
7	1/9/2024	Henryk Marcinkiewicz	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Dear Commissioner Walters,</p> <p>I am writing to encourage you not to rezone the 400-acre property north of Bond Road and adjacent to the Port Gamble Forest Heritage Park.</p> <p>Kind regards, Henryk Marcinkiewicz</p>



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8	1/10/2024	Jason	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Hi my name is Jason and I use the port gamble property for hiking and mountain biking. I'm writing to express my concern with the re-zoning plans for the bond road area. Bond road traffic is already bad. Without a significant improvement to the road system, the traffic issues will grow exponentially and become a public safety issue. Please don't allow the re-zoning of this area. Instead I would encourage the developers to pursue a different area that could handle the significant increase in traffic. Also, the YMCA in Silverdale is successful because it is very close (within walking distance) of the middle and high schools, allowing students to benefit from the after school activities. The current location is in the middle of nowhere as far as students would be concerned. This seems like a not well thought out plan. Again, please don't allow the re-zoning, it will be a monumental failure.</p>
9	1/11/2024	Travis Merrigan	DDR	Housing	<p>A couple questions about housing zoning and what is changing between 2016 and 2024 Comp Plans. I see the map of changes + Kingston, Silverdale and Central Kitsap Growth Centers.What I don't see is virtually any zoning changes to permit increased density, virtually anywhere else in the UGAs.</p> <p>Did the county consider: -- adopting HB 1110 'Missing Middle Housing' rules in UGAs (allow ADUs and/or duplexes or 4-plexes on existing SFH zoned land? One could walk to ferries from parts of E Brem UGA, or walk to the Shipyard from Navy Yard City UGA -why not upzone those areas? -- The CK Growth Center seems small, why not extend high density housing zones northward up Wheaton Way, which has frequent bus service, so apt development can occur near transit? -- Southworth seems like a great place for mixed use housing (maybe an apt over a grocery store) for people to make car-free commutes to Vashon or Fauntleroy.</p> <p>The goals you set out are good, but I just don't see the urgency in the zoning, if transit-oriented, carbon reduction, rural protection is the goal. Seems like the county should create more places where developers can build, focused nearest transit and the cities.</p>
10	1/11/2024	Douglas Campbell	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Commissioner:</p> <p>I am writing to vigorously protest the proposed rezoning of Bond Road to allow for a high-density housing development.</p> <p>I own a Rural-Residential zoned property in North Kitsap and cannot make even minor grading changes without the county’s intervention or stop-work orders. So how is it possible to ramrod such a cursory and ill-intended change?</p> <p>Clearly someone is benefiting from this malfeasance, and if it moves forward, I intend to organize and publish an investigation into those benefactors, as well as oppose your reelection as a commissioner. My voice represents many who may not be speaking out now. But there will be a groundswell and action on another order of magnitude if this rezoning occurs.</p> <p>The propaganda campaign about the recreational facility in the media, with no mention of the development, is clearly just a trojan horse to spearhead this horrendous proposal.</p> <p>I vehemently urge you to oppose this rezoning, and to help preserve the semi-rural and spacious character of Kitsap, for all of us now, and for future generations.</p> <p>Attentively awaiting your decision,</p> <p>Douglas Campbell</p>

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11	1/15/2024	Brooke Hammett	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>I am writing to voice my opposition to the requested rezoning of the Raydient Stottlemeyer site.</p> <p>I believe this particular location is a poor choice for this type of development for a number of reasons. Traffic will be heavily impacted on an already deadly and dangerous stretch of road. Local wildlife, already being squeezed out by other projects within the Heritage Park, will be affected by the noise, lights, construction and development of the sports complex. I am concerned about water quality, living within three miles of the site myself and depending on a well for our water. I'm also concerned about the health of the nearby creeks and bay, which is still recovering from decades of contamination by the mill.</p> <p>Finally, I don't see this as part of the fit of the Comprehensive Growth Plan. The site itself falls miles outside of Kingston itself, and is not within the UGA. There are no sidewalks serving the area, and pedestrians-even cyclists-using Bond road have to be extremely careful due to the number of accidents. If careful planning isn't executed, Bond road will become nothing but sprawl between Poulsbo and Kingston. I would hate to see that happen. Thank you for your time.</p> <p>-Brooke Hammett, Poulsbo</p>
12	1/15/2024	Brooke Hammet	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Good morning,</p> <p>Happy MLK day! I am writing to voice my opposition to the requested rezoning of the Raydient Stottlemeyer site.</p> <p>I believe this particular location is a poor choice for this type of development for a number of reasons. Traffic will be heavily impacted on an already deadly and dangerous stretch of road. Local wildlife, already being squeezed out by other projects within the Heritage Park, will be affected by the noise, lights, construction and development of the sports complex. I am concerned about water quality, living within three miles of the site myself and depending on a well for our water. I'm also concerned about the health of the nearby creeks and bay, which is still recovering from decades of contamination by the mill.</p> <p>Finally, I don't see this as part of the fit of the Comprehensive Growth Plan. The site itself falls miles outside of Kingston itself, and is not within the UGA. There are no sidewalks serving the area, and pedestrians-even cyclists-using Bond road have to be extremely careful due to the number of accidents. If careful planning isn't executed, Bond road will become nothing but sprawl between Poulsbo and Kingston. I would hate to see that happen. Thank you for your time.</p> <p>-Brooke Hammett, Poulsbo</p>
					<p>Hi Eric! Thanks for the good talk tonight, it was enlightening. What I wanted to do was insure that the Enetai community issue of slowing down development here, was on the radar. I for one, completely understand the need for more housing in the Bremerton region, but living where I do, I want to try and slow it here; it belongs in the city core, not the fragile slopes over the ocean. Admittedly our little neighborhood is small compared to the replanning of the Silverdale Mall, but we are trying to stop the situation before it gets out of hand.</p> <p>I refer to permit #23-05658, the Fisher-Cheney plat, just to the south of the Viewcrest/Candy Cane Lane (CCL) neighborhood (District 67.) Right now the Fisher platt is standing at a zoning of 5-9 units per acre. The developer's preliminary plan mentions removal of trees "to improve the view" he is not planning on affordable housing, he is wanting to build high-end single family units, and tear down a well-developed forest to do it. Viewcrest to the north, and Rozewood to the south are zoned at 1-4, I live on Viewcrest and I'm on a quarter acre lot. We are trying to get the Fisher property density level lowered to 1-4 to be in keeping with surrounding neighborhoods.</p> <p>As well, we are attempting to bring the Fisher Platt into the Illahee greenbelt zone, which includes Illahee Preserve, Illahee Park, and CCL/Viewcrest, all of it wildlife corridor, and one continuous ecological zone. This corridor currently stops at 30th, on the north end of Fisher's property.</p>

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13	1/16/2024	Christie Schultz	Land Use Reclass (Site Specific)	Land Use	<p>I've gotten to know this region fairly well, I walk around here a lot. The Viewcrest neighborhood, as it goes downhill, is a series of homes built on a series of fills and ridges. I have heard feed-back from my neighbors with foundation problems, and my own home has a few cracks..... and I could point you to a lot on Classic which has a million-dollar view of Mt. Rainier. But no one has ever had the courage to build on the sloping lot. Knowing what I know NOW about the terrain (I've been looking a lot at LIDAR of the region), I would hope the county has projected in some future having a geological re-assessment of this slope. Puget Sound is known for landslides, and I hope my home is not sitting on a future disaster. The Fisher Plat is part of the same terrain. It slopes... a LOT. There are some pretty deep canyons, gullies, and possibly unknown salmon streams, all covered in cedars and VERY tall trees. I utterly get the tree retention; this soil erodes, it does not absorb water, and if a developer takes out trees (which absorb a good deal of the water in their leaves, we are talking some very tall lodgepole pines in this Fisher Platt) it could destabilize the entire slope. We have no clue where he plans to put his storm water run-off, but 9 units per acre is going to be impactful!</p> <p>There is also an eagle nest in the Fisher Platt, the developer has done nothing with regards to SEPA reports, and is talking of bringing in a sewer line. I personally heard the eagle, the nest is of course notoriously well hidden, but they are certainly there, and they are occasionally seen too. We have owls (possibly 3 or 4 species from the calls) and songbirds all through this area, all of which are protected under the Migratory Bird Act. We have bats too, which are threatened nation-wide. We have deer, bobcats, etc in that platt. A close examination of all this, in keeping with the Kitsap Buildable Lands publication (pages 13, 17, 18, 23, 24, 41, 42, 43 and 55) is in order; we have much more material, but I am trying to keep this simple for now. Please do not approve any development on this platt without closer scrutiny, and please consider re-zoning (to something less dense) the Fisher Platt, in your update to the County plan.</p> <p>IMHO there is a great potential for turning this area into hiking trails and greenbelt (I utterly agree with the quality of life concept, that is what makes this a place people WANT to move to!) which would bring eco-tourism to the area. We have long distance bicyclists who come through our neighborhood NOW in the summer. Lower density homes with septic systems would help the aquifer recharge zone (indeed there is a spring on the Fisher property! Does the County even know this?) There is really little benefit in terms of "affordable housing" to allowing this development, there are no bus stops there, and no elementary schools, no services. The homes will be high end.</p> <p>More can be read about our community at <a href="http://www.saveenetai.org">www.saveenetai.org</a></p> <p>Thanks for your time! Christie Schultz, secretary Enetai-Illahee Community Citizens Association (EICCA)</p>
14	1/16/2024	Melissa Witek	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>I am writing to strongly oppose the Bond Road area re-zone proposed by Raydient Corporation.</p> <p>The proposed re-zone conflicts with the mandates and purposes of the Growth Management Act. The proposal would allow a four-fold increase in density. Not only would this increase in density represent an existential change to the rural nature of the surrounding community, which includes the adjacent Port Gamble Forest Heritage park, it would also threaten the environmental health of this rural forested area.</p> <p>Further, by allowing Raydient an exception to the existing zoning of this area, the County would create a precedent for other exceptions, thus creating a slippery slope toward further exceptions and development.</p> <p>Thank you for your consideration.</p> <p>Melissa Jackson Witek</p>

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15	1/18/2024	Ed Goodwin, Kingston Historical Society	Land Use Reclass (Site Specific)	Land Use	<p>The Kingston Historical Society asks the Board of Commissioners to consider the history of the property at 26686 Lindvog Road NE before rezoning it in the 2024 Comprehensive Plan.</p> <p>E. O. Schwagerl and Frank T. Reid moved to Kingston with the intention of establishing a Theosophy colony, a religion popular in the late 19th century. Schwagerl and Reid planned to grow and to eat only vegetables, establishing the “Kingston Co-operative Fruit Growers Association of 1890.”</p> <p>E. O. Schwagerl stayed in Kingston only briefly and lived out the rest of his life in Seattle or Tacoma as an important landscape architect.</p> <p>Frank T. Reid served as a Superior Court Judge for Snohomish and Kitsap County. Originally from Tennessee where he served in the Confederate Army and unsuccessfully ran for governor, he and his wife Josephine Woods lived on Kingston property they affectionately called “The Nook.” They had five children. Josephine Reid died on the property.</p> <p>We encourage the Commissioners to be mindful of the story of “The Nook” and to preserve its initial purpose as much as possible.</p> <p>Sincerely, Ed Goodwin, President Kingston Historical Society</p>
16	1/18/2024	Bill Budd	Comp Plan	Land Use	<a href="#">See page 12</a>
17	1/18/2024	Kathie Lustig	Comp Plan	CAO, Environmental	<a href="#">See page 13</a>
18	1/18/2024	Anonymous	Comp Plan	Transportation, Environmental	<a href="#">See page 14</a>
19	1/19/2024	Celia McMartin	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>i am against this project. i have lived in Gamblewood for 24 years and seen the growth that our roads barely support now. Bond road has a nickname...Slaughter Alley. with the hazardous waste site near this proposed complex, its too much. Sincerely, Celia</p>
20	1/19/2024	Celia McMartin	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>i have lived in the Gamblewood neighborhood for 23 years. Of course I have been witness to many new additions to my beloved Kingston area. As traffic has increased, concerns have grown among all of us here. We neighbors, with the county's help, were successful in reducing the speed limit on Gamble Bay RD as many use it for a short cut to avoid the highway. I am fearful of the impact of a sports complex. Bond road is dreadful. Accidents, fatalities and now a hazardous waste dump going in. I feel the rezone attempt is short sighted and the ecological impact will be devastating. i would like to see this ridiculous sport complex idea shelved and the money go to fixing up what we already have in preparation for the inevitable population growth. please add my comments to the comp plan. Sincerely, Celia</p>
21	1/21/2024	Andrew Mangan	Comp Plan	Transportation	<p>I read the Kingston plan and didn’t see a goal(s) linked to planning and coordination with the ferry systems that provide critical transportation and community links for the area. Without the ferries Kingston would be totally different place and the listed goals would be greatly different. How will Kingston and the ferry systems grow? How will they integrate with the goals outlined?</p>
22	1/21/2024	Sharon Hill	Comp Plan	Transportation	<p>I live off Hwy 3 about 2 miles from the hood canal bridge. Any proposed plan should address the impact on the traffic congestion that will occur with increased development.</p> <p>With Bond and Hwy 3 having only single lane 2 way roads and already congestion of traffic, any development should include plans to widen the roads to double lanes.</p> <p>Please bring this issue up at the meeting.</p> <p>Thank you, Sharon Hill--registered voter</p>

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23	1/21/2024	Christopher St. Romain	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Please keep working on this we need facilities for keeping fit and health for all.</p> <p>Thank you Christopher</p>
24	1/21/2024	Judith Kaylor	Land Use Reclass (Site Specific)	Island Lake Reclassification	<p>Judith A. Kaylor</p> <p>I live at the intersection of Island Lake Road and Camp Court NW. There is a very sharp corner in Island Lake Road as it comes down the hill from the west. Drivers have to turn “carefully” to stay on Island Lake Road or to proceed left down Camp Court NW. If they are going too fast or not paying full attention or the road is icy or snow-covered, they miss the turn and run into my property. This has happened at least once a year or more since I have lived here (for 49 years). It’s terrifying and destructive. The County has put up road signs and suggested vehicle velocity signs, but it still happens.</p> <p>I am also protesting that the land, which used to belong to Christa Bible Camp, is being planned by the County to become an urban-developed area with the only input-output road being Camp Court NW. I don’t think any of you would want to live in my location with all that extra traffic on Camp Court NW and Island Lake Road. It scares me to even think about it.</p> <p>Besides, there is a salmon-bearing stream (Barker Creek), a very clean and plentiful aquifer (Island Lake Aquifer), storm water drainage, and many other items that can be disrupted or destroyed by this project. Please consider the waste and disfunction this plan can wreak on our area.</p>
					<p>To whom it may concern:</p> <p>I am writing to you to express my concerns about the Raydient request to rezone their land and the proposed sports complex at Port Gamble by Bond and Stottlemeyer roads. I am a lifelong Kitsap resident who is dismayed at the destruction of our forests only to have them replaced with high density "mcmansions" and condos, with not a tree in sight. I enjoy using the Port Gamble Trails and I also own a home nearby in Gamblewood. I lived in Gamblewood for 10 years and then I kept my home and moved to Poulsbo in 2012 when I got married. Poulsbo has already lost most of its forests. Let's not do the same to Kingston. Here are my reasons why I feel this way:</p> <ul style="list-style-type: none"><li>• The rezone and the proposed Sports complex site are a violation of the Growth Management Act.</li><li>o The GMA is designed to protect "Critical Areas" defined as “areas with a critical recharging effect on aquifers used for potable water.” The area where Raydient wants to rezone falls under this definition.</li><li>o The proposed rezone and building fall OUTSIDE an urban growth area (UGA) and will lead to disorganized urban sprawl into a priceless rural area.</li><li>• Permitting the Raydient rezone sets a bad precedent.</li><li>o Other developers will want to follow suit if an exception is made for Raydient. By making this exception, they are making more money by making the land more appealing to developers. Changing the land from one house per 20 acres to one house per 5 acres or 1 acre completely changes the rural characteristic of the area.</li><li>• There is no justification for the proposed sports complex at Bond Road and Stottlemeyer.</li></ul>

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25	1/21/2024	Cassandra Ellsworth-Gross	Land Use Reclass (Site Specific)	Raydient Reclassification	<div><div><div>o There is no public transportation available to the proposed sports complex site.</div><div>o There is no confirmed way that this sports complex will be paid for or the land managed once it is built.</div><div>• Other reasons to not allow the rezone nor the building of the sports complex at the proposed site:</div><div>o Our forests are an irreplaceable resource that once gone, they are gone for good.</div><div>o Port Gamble Heritage Park will be negatively impacted. People already come from all over to use our trails and they are a gorgeous treasure that we need to protect.</div><div>o Raydient is already implementing their playbook from other rural areas where they owned land: Persuasively partnering with community organizations to ensure that they get what they want: More profits from selling their land to developers and ignoring the voices that are against their plans.</div><div>o Wildlife corridors will be destroyed.</div><div>o Fragile wildlife specific to the area will be lost or pushed more quickly to the edge of extinction, such as salamanders and frogs.</div><div>o The traffic infrastructure already cannot handle the existing traffic. There is no sensible plan to deal with the traffic added by the sports complex or additional homes outside the one per 20 acres.</div><div>o The rezone and the sports complex do NOT help with one of our greatest needs: Affordable housing. Only the rich will benefit.</div></div><div>I urge you to vote against the Raydient rezone request and the proposed sports complex and to save our forests from further destruction.</div><div>Sincerely,</div><div>Cassandra Gross</div></div>
26	1/22/2024	Josh O'Brien	Land Use Reclass (Site Specific)	Raydient Reclassification	<div>Hello,</div> <div>I am writing to you today to help represent and add my name to those opposed to the planned NK sports complex. I won't be able to attend the next meeting and I know the Notary is trying to silence the opposition by stacking the room.</div> <div>A few reasons I personally oppose it:</div> <div><div>•Create more traffic.</div><div>•Create more emission, light and noise pollu on. All of which are bad for nature and our kids.</div><div>•Stress our already fragile water system. Even turf fields need to be watered. Turf fields will also release micro plas cs into our waterways.</div><div>•The Notary hasn't said how it's going to be paid for. They haven't ruled out more taxes.</div><div>• Wolfle, Gordon, Kingston Middle and High schools all have underu lized field space that would be er serve the community. In fact, there's going to be a Bond vote in February to improve the school fields. So we're risking taxes going up and hurting the elderly on fixed income.</div><div>•This is nothing more than a ploy to increase the profits for a few connected golfing buddies.</div></div> <div>Please don't fall for the smooth talking salesman as they pack events with those wanting to rob our community of its charm for profit.</div> <div>Here is more proof of the true lack of public support <a href="https://www.gofundme.com/f/kingston-sports-field-complex">https://www.gofundme.com/f/kingston-sports-field-complex</a> In 9 months they've only raised \$2600 dollars.</div> <div>Please be on the right side along with both Tribes and the City of Poulsbo and stand against this project.</div> <div>Thank you for your time.</div>
27	1/22/2024	Christine Brinton and Donald Thomsen	Land Use Reclass (Site Specific)	Raydient Reclassification	<div>See <a href="#">pages 15-16</a></div>

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28	1/22/2024	Chris Stevens	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>As a resident of Kitsap County, I ask you to vote NO on the Bond rezone.</p> <p>I frequently walk and bicycle Port Gamble forest. The peaceful, low-traffic, low-density nature of Port Gamble, and of North Kitsap, are important to my family member who has PTSD, and my mental well-being. I need this quiet place to recreate in. All the extra traffic would wreck that solitude for me.</p> <p>Don't be fooled by the offer of the YMCA facility; it should properly be located within one of the already-urbanized areas.</p> <p>Why bother having a land-use plan if developers can ask you to make exceptions for them whenever they feel like it?</p> <p>Please adhere to the purpose of the Comprehensive Land-Use Plan; housing developments belong within the urbanized areas, not in the rural and park areas.</p> <p>Thank you.</p> <p>Christopher Stevens</p>
29	1/23/2024	Thomas Garrett	DDR	Land Use, DDR Edits	<p>Title 16 Land Division and Development to add comments in Title 16.04.050 Applicability and exemptions the following: Kitsap County to require any developer building new homes bordering and are adjacent to Kitsap County Port Gamble Heritage Park (Park), to have a legally binding incorporated and bonded Owners Association (OA) to oversee and ensure compliance with State and County Codes/Regulations in the Rural areas. The developer/parcel owners will furnish a detailed project schedule and binding site plan to be approved by Kitsap County. This would allow Kitsap County to manage with minimum staff and third party services. This OA would continue for life of the Development. OA to manage new permits and ensure compliance with the Critical Area Ordinances.</p> <p>Title 17 Zoning</p> <p>1. Add a new permanent classification "Rural Residential Protection and (RRP) - All Parcels designated RR Rural Residential that border and are adjacent to the Kitsap County Port Gamble Heritage Park (Park) shall be re-designated RRP for Rural Residential Protection. This should be done to better protect the Park from damage, encroachment and fire.</p> <p>2. Add a new permanent classification "Rural Wooded Protection and (RWP)" All Parcels designated RW Rural Wooded that border and are adjacent to the Kitsap County Port Gamble Heritage Park (Park) shall be re-designated RWP for Rural Wooded Protection. This should be done to better protect the Park from damage, encroachment and fire.</p>
					<p>Dear Commissioner Walters,</p> <p>I am writing today to express my support for the proposal to create a sports and recreation complex on property off Bond Road and for the zone reclassification application from Raydient for this property to be approved. It is my opinion that an additional 60 houses is a small price to pay for what the community gains from this project.</p> <p>The need for additional sports and recreation facilities in North Kitsap, and especially north of Poulsbo, is huge. Right now, kids are playing on crowded fields in poor conditions, creating unnecessary safety risks. Coaches are fighting to reserve what limited space is available, families are driving long distances for their kids to be able to play, and kids are having to practice after dark because that is the only time their team was able to reserve. There is already a significant shortage of space, and this problem is only going to grow with the coming population growth. Our children deserve so much better!</p> <p>I am a Rotarian and part of the committee working hard on this project. We have spent significant time searching for available land in the greater Kingston area. It is our opinion, after substantial research and time spent surveying available land, that this property is the best option for a number of reasons. It is centrally located to all North Kitsap communities and would therefore be convenient for families, and it is large enough to accommodate both the current need as well as future growth. This land is also ideal for building fields, with few drainage and wetland issues to overcome. The ability to integrate the sports complex into the existing Port Gamble Heritage Park with trail connections and additional natural open space makes this site truly unique.</p> <p>I am also a strong supporter of the environment and an avid hiker. I understand that there are environmental concerns expressed by the community, but I believe these can be overcome through a design plan that prioritizes wildlife corridors, addresses aquifer recharge through appropriate filtration and storm management, and restores healthy, biodiverse forest in the undeveloped open</p>



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30	1/23/2024	Emily Froula	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>space. I see this as a huge improvement from its current use as logging land.</p> <p>This is a huge opportunity for our community, one that may never come again if we pass on it. Please support the rezone application and help us meet the needs of our community!</p> <p>Thank you,</p> <p>Emily Froula, Rotarian and Kingston business owner</p>
31	1/23/2024	Julie Ullrich	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Dear Whomever listens,</p> <p>Thank you for your consideration in hearing my concerns with Raydient Rezone/YMCA</p> <p>Where do I begin? Suppose I will start with having a business off Bond Road. First off hardly no one goes the speed limit. Our Business is off Foss. We literally pray to turn safely East on Bond. Any street that has to turn East on Bond is extremely dangerous. We cross it many times a day. Please for the Love of all people something must be done with this road. With the expansion of more houses built, businesses ect. this road can not handle more traffic.</p> <p>Second - Stottlemeyer Road. We live off this road and same as bond, most people do not go the speed limit. We have people walking, riding bikes, wild life, dogs, goats, even pigs on this road. If you build up the YMCA / Rec. center people will use this road as a "safer" alternative to connect to the YMCA and ruin our quiet country road. Which already has issues with the amount of traffic with the trails.</p> <p>Although I understand Raydient will do something with the property because stockholders own it and want to make a profit I believe you have the decision to control how much they are able to divide the property into smaller parcels to add more houses or not.</p> <p>Having a YMCA / Recreation would be wonderful for all but this is not the location. Please consider our precious resources of Kitsap County. Seattle visits here for quiet/vacation to show their kids our wildlife the beauty of Kitsap Co. Why would we destroy that?</p> <p>Our property is arms length to Stottlemeyer trails between our family we have fifteen acres. We have bears, deer, bobcat's, coyote, owls, eagles, ducks, cant even count all the types of birds. We see daily on our property. Kitsap is shrinking and we'll be killing what is little left of their habitation.</p> <p>The animals don't have a voice . Please let's preserve what we have left that's the least we could do for them.</p> <p>Respectfully,</p> <p>Julie Ullrich</p>
					<p>I have been a resident of Kingston since 1986 and have watched many changes happen in the area.</p> <p>Most changes have been for the better especially those in Kingston itself. We still retain a small town feel and haven’t had much sprawl.</p> <p>I am opposed to the idea of rezoning the area at Stottlemeyer and Bond from 1 house per 20 acres to 1 house on 5 acres and especially to the proposal of adding a sports complex with fields, parking, restaurant and YMCA. This proposal benefits the Radient corporation which is a profit making company not even headquartered in Washington state. It does NOT benefit the residents of the area or the environment.</p> <p>Why create a destination point that will necessitate car trips from any of the population centers? Why not locate a facility in Poulsbo where the fields and facility would be available to walkers and bikers?</p> <p>Kitsap county lacks good mass transit and has been promoting car travel by not placing services within walking distance. This project is the pinnacle of that attitude.</p> <p>If we are going to focus on reducing car trips, why put such a facility 8 miles outside of any population center?</p>

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32	1/24/2024	Janice Hill	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>The site is also right next to a popular trail for horses, walkers and bikers.</p> <p>This facility should be located in an area that is already subject to development such as up on the hill in Poulsbo by Olympic College. Perhaps the facility could even be co-sponsored and/or shared with Olympic College.</p> <p>Thank you for rejecting this zoning change and for refusing to support a sports center at this location.</p> <p>Janice Hill</p>
33	1/25/2024	Karen Mills	Environmental Element	Environmental, Land Use	<p>I have read your environmental “plan” and it is a lot of nice words, however the county certainly hasn’t proven it’s commitment to the environment in relation to community development. I have watched numerous developers submit plans that multiple citizens have requested Environmental Impact Assessments for, and the county has continually found feeble excuses for not demanding those plans be done. If the county really wants to develop a plan that is good for the county, develop one that really looks at them impacts of the huge developments. Look at the way this will impact the future life in this county. We benefit by the trees and wilderness areas. WE DO NOT BENEFIT BY LETTING DEVELOPERS ALWAYS HAVE THEIR WAY. Kitsap is an incredible place to live, but it won’t be if the county doesn’t start protecting it.</p>
					<p>I am writing to comment on the proposal by Raydient Property Group (formerly Olympic Property Management) to rezone their 400-acre Bond Road/ Stottlemeyer Road/Minder Road property to accommodate a Sporting Complex and clustered housing development. Although the Kingston area can use more sports facilities for youth, I strongly oppose this development.</p> <p>Having a major sports plex and an up zone of 400 acres from Rural Wooded (1 du per 20 acres) to Rural Residential (1du per 5 acres) is exactly the kind of suburban sprawl the Growth Management Act is meant to prevent. This is even more urgent as we face climate crisis and habitat loss. We absolutely need to take significant actions now- to densify the urban growth areas where the transportation and infrastructure is located, and conserve what lands we have left to protect water, forests, air quality, and wildlife.</p> <p>I also am aware of the great need for more housing in our community to address the current and growing population, especially the need for affordable housing. Urban centers in our communities would benefit from apartment buildings, townhouse complexes, duplexes AND single-family homes that are more affordable. However, we need to meet this need for more housing in a way that relies on data and planning. We need to have thought and consideration to where and how we build, while protecting the rural and forested lands we have remaining, and protecting critical areas such as streams, wetlands, and critical aquifer recharge areas.</p> <p>As you all well know, the Growth Management is the law in Washington State, and needs to be adhered to. The GMA mandates that growth be concentrated in urban growth areas, where the infrastructure is. This is from the County’s own website: “In the 1990s, the Washington State legislature enacted the Growth Management Act (GMA),36.70A Revised Code of Washington (RCW). The purpose of this state mandate was to address concerns over unplanned and uncoordinated growth that led to sprawl or suburban-type development, loss of farmland, natural resource degradation and uncoordinated capital facilities development.” -Exactly what this development would cause and County planning is mandated to prevent!</p>

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34	1/25/2024	Beth Nichols	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>This development would lead to suburban sprawl, especially along already congested and dangerous Bond Road. There is little infrastructure to support a sports facility and the traffic and population that would bring; it would be an example of an uncoordinated capital facilities development. It would clearly bring about natural resources degradation to wetlands, Port Gamble Creek, and forests that are needed for climate change mitigation. Port Gamble Creek flows into Port Gamble Bay and affects the Tribal treaty rights of the Port Gamble S’Klallam Tribe. It is a horrible location for this kind of development.</p> <p>The proposed site for the rezoning and development is only 3.5 miles away from the City of Poulsbo’s PERC project ( <a href="https://cityofpoulsbo.com/perc-updated/">https://cityofpoulsbo.com/perc-updated/</a>). The PERC sport complex will meet the need for sporting fields and facilities, and it is in a PRIME location- close to restaurants, shopping, freeway access, transit and Olympic College. It is fiscally inefficient to develop two sports facilities so close together.</p> <p>The Kingston area is already dealing with another massive development that was a former Olympic Property Group rezone, unfortunately rezoned to an urban growth area- the Arborwood development. We have yet to feel the full impact of that large development but already the clearcutting and habitat loss are causing witnessed impacts on local wildlife and significant loss of tree cover. Wetlands and small streams in the Arborwood area may be jeopardized by phase 2 of the development. And, the Port Gamble Master Plan is in the works, with more environmental, traffic and water quality impacts.</p> <p>Yet another development by Raydient /Olympic Property Group, outside of the urban growth area, that is not able to handle the increased development, density, and traffic is not warranted and would be extremely detrimental to the North Kitsap community. We ask that the County deny the rezone, based on zoning guidance, critical areas protections, and wise implementation of the Growth Management Act.</p>
35	1/25/2024	John Willett	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>(email to Jon Rose) Jon, That I believe was your best presentation on your NKU proposal last night in Kingston. There are still a lot of details not known, as you know. In my talks with a lot of people and Leaders, I don’t see how this is going to fly? The property does not adjoin any GMZ/A which makes it very hard to do and get the zoning change that it will need. And Lot’s of very vocal opposition! It looks like DCD does not have this up zone on the approval list in the Comp Plan update. Consequently, I believe we need to start looking at other alternatives that will benefit Raynoir, the environment and the public needs. I have floated the idea of starting up another KFBC like group to help talk through the community needs and solutions that will do both above. AS you know, this is what I did with the PGHP and OPG development proposals, and out of that we wrestled our way to a workable solution, which is now seen as a remarkable achievement and a feather in your hat. AS you know, Poulsbo already has the funding, property and plan for a Rec Center in the Market Place Development there, in a GMA/Z and in the middle of a big population area. Kingston needs a Rec Center, too. But, I believe it needs to be in the GMA/Z and close to the population center of Kingston. Kingston needs Ball Fields, true. They could do that on a section of these 400 acres. Rotary could buy a 40 acre parcel from Raydient to do that. KCPD could “buy” the other 360 acres and add it to the PGHP. Also, The County could relook at the NKHP and put ball fields there, as they have a old plan, or negotiate with Arness Tree Farms for the Gavel Pit next to the Park for Rec development. I say this because, Bill Arness came to me just before his passing and asked me to talk to the County about buying the Pit. I did and was turned down. There are different leaders in the County now. Bottom line here; I just don’t see the County giving the up zone for this proposal and I believe we need to start looking at alternatives, as the need, as we all know, is there. Hey, how about putting the Rec Center on the big Port Gamble parking lot, after the soils settle? Great amenity for the Port Gamble development you will be soon undertaking! I wanted to be upfront with what I am doing with you, as usual. Happy Trails, jw</p>

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36	1/25/2024	Jon Rose	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>(email response to John Willet) Hey John -</p> <p>Thanks for attending last night. It was gratifying to see such a good turn out. The crowd really seemed to appreciate the presentation.</p> <p>Lots of ideas in your email to give thought to, which I will. First, please read the White Paper which I have attached.</p> <p>A. The rezone we are requesting is for Rural Residential which is the most common rural zone in all of Kitsap.</p> <p>B. Our current zoning (Rural Wooded) no longer fits the conditions in North Kitsap. Rural Wooded was intended to help encourage lands to stay in timber production. This is no longer possible in North Kitsap. So, if the county is serious about following their own policy, they will allow us to move to Rural Residential.</p> <p>C. The GMA and Kitsap's zoning codes allow sports fields and community facilities like the Y outside UGA's. No rezone needed for them. The White Paper articulates all of that in very great detail.</p> <p>D, Yes, the community can try to purchase the land, but if we are zoned Rural Residential, we will cluster the lots and the community will get at least 200 acres without having to raise the funds.</p> <p>E. Every time we present people with facts at our meetings many of them change their feelings about the project.</p> <p>Let me know your thoughts after you read the White Paper.</p> <p>Best,</p> <p>Jon</p>
					<p>Dear Kitsap County Commissioners,</p> <p>I am writing to express my opposition to Raydient's request to rezone their 400 acres on Bond Road to allow the number of single family residential lots to increase from 20 to 80, and the proposed sports complex, commercial zone, and increased density housing development. This is NOT the place for a sports complex or intense development.</p> <p>Here are my concerns:</p> <p>Growth Management Act: This project would create intense development in a rural area adjacent to the Port Gamble Heritage Park- disorganized sprawl that the Growth Management Act was designed to avoid. To promote responsible and sustainable growth, this type of dense project should be located in an urban setting with urban amenities. Our Rural areas are part of Kitsap’s beauty and character and need to be protected. Permitting this rezone not only causes irreparable damage, but also sets a bad precedent for future developers who will want to follow suit.</p> <p>Traffic: Traffic infrastructure already cannot handle the existing traffic. There is no sensible plan to deal with the traffic added by the sports complex, commercial zone, and additional homes outside one per 20 acres. There is no public transportation to the proposed sports complex site. The Kingston North Kitsap Rotary itself, which supports the proposal, admits that based on a feasibility report " The biggest challenges will be wastewater and stormwater management and dealing with increased traffic by the project." (See <a href="https://rotaryknk.org/1892/Page/Show?ClassCode=Page&amp;Slug=north-kitsap-sports-and-recreation-complex">https://rotaryknk.org/1892/Page/Show?ClassCode=Page&amp;Slug=north-kitsap-sports-and-recreation-complex</a>)</p> <p>Duplication of new sports centers: This proposed project is 3.8 miles from the proposed Poulsbo Event and Recreation Center (PERC), and planning for that project is already underway. The city of Poulsbo opposes the rezone of the Bond Road property.</p> <p>Viability of Funding: There is no confirmation that the sports complex can obtain funding for construction and ongoing maintenance including wastewater discharge and road improvements</p>

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37	1/27/2024	Kaylee Russell	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Taxpayers could end up with unsustainable tax burdens. We could end up with Raydient’s wish list for housing and commercial development being built, but no way for the community to proceed on the sports complex project due to inability to fully fund the project.</p> <p>Water and Environment: This proposed housing development, sports complex, and commercial zone would be located on a critical aquifer recharge area, near mapped fish bearing streams, and a mapped wetland- putting our local drinking water resources and watershed health at risk. A sports complex including turf fields and large amounts of parking would cause high amount of impervious surface, stormwater discharge and wastewater. For instance, the septic discharge is estimated at 100,000 gallons a day.</p> <p>Wildlife Habitat and Park environment: The rezoning proposal would displace numerous animal populations currently living on this site. The intensity of development would degrade the habitat and outdoor experience of Port Gamble Forest Heritage Park, with neighboring lighting, car trips, and user population.</p> <p>Tribal Concerns: Port Gamble S'Klallam Tribe opposes the Rezone on Bond Road.</p> <p>The Suquamish Tribe opposes the rezoning of rural protection or urban restricted parcels to more intensive uses.</p> <p>Affordable Housing Goals: The rezone and sports complex do not help with the target for affordable housing that the County is required to meet by the GMA. The houses will only be for high income earners.</p> <p>You have the power to make a decision that will not only benefit this generation, but also those to come. Please vote against the Raydient rezone request and do what is within your power to prevent the proposed sports complex, commercial zone, and increased density housing development. I know Raydient doesn't care what happens to our beautiful area, but I sincerely hope that you do.</p> <p>Thank you for your time and consideration.</p> <p>Respectfully, Kaylee Russell</p>
38	1/27/2024	Sara Frey	Land Use Reclass (Site Specific)	Land Use	<p>To whom it may concern,</p> <p>Regarding the proposed revisions to zoning along Lindvog in Kingston to accommodate medium density dwelling units, This kind of high density building in a rural setting is completely contrary to what the nature of the existing area. It is a violation against all home and landowners in the surrounding area that made their real estate purchase based on the existing environment. We already have the massive developments going on at Whitehorse and more housing coming off Lindvog.</p> <p>Infrastructure in this area is already burdened by the existing traffic and significant infrastructure changes would be necessary to accommodate additional population. The submission for approval argues that the buyers of these units will be comprised mostly of East side people commuting to Seattle and further, that these people will WALK to the ferry. This argument is nothing short of ludicrous! Anybody that has lived in this area for any amount of time knows that the romance of walking that distance of 1.3 miles and 28 minutes in the rain and cold will fade after one or two experiences. The current fast ferries can only accomodate so many individuals. They will drive. Traffic will be a mess. Risk of road runoff into water sources is increased. We also have those condos across the highway on Lindvog that remain only partially sold after a significant period with the vast majority of the units being incomplete concrete stairs sitting behind chain-link being a real eyesore for years now. The marketing on those boasts a "20 min foot ferry to Seattle" which is less than half the time it actually takes and is blatantly false. Also, the large developments going in already have overburdened our limited grocery store capacity and other services not to mention the severe difficulties with the ferry capacity that we have all been experiencing for years now.</p> <p>This is simply a very bad idea, fueled by developers that want to make money and the county that wants to collect more taxes. Restrict this type of development to existing high population density areas as they have in Edmonds, Redmond, Ballard, Poulsbo, etc. We simply do not have the infrastructure to grow at the pace that the County has been allowing.</p> <p>Sara Frey Kingston, WA</p>

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39	1/27/2024	Devan Kleinman	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Dear Kitsap County Commissioners,</p> <p>My name is Devan Kleinman, I am a lifelong North Kitsap resident &amp; I am writing to express my concerns about Raydient's request to rezone their 400 acres on Bond Road and the proposed sports complex, commercial zone, and increased density housing development. This is the wrong place for a sports complex and intense development.</p> <p>Here are just a few of my many concerns:</p> <p>This project would create intense development in a rural area adjacent to the Port Gamble Heritage Park- disorganized sprawl that the Growth Management Act was designed to avoid. To promote responsible and sustainable growth, this type of dense project should be located in an urban setting with urban amenities. Our Rural areas are part of Kitsap’s beauty and character and need to be protected. Permitting this rezone sets a bad precedent; other developers will want to follow suit and the rural area will be turned into sprawl.</p> <p>Traffic infrastructure already cannot handle the existing traffic. There is no sensible plan to deal with the traffic added by the sports complex, commercial zone, and additional homes outside one per 20 acres. There is no public transportation to the proposed sports complex site. This proposed project is 3.8 miles from the proposed Poulsbo Event and Recreation Center (PERC), and planning for that project is already underway. The city of Poulsbo opposes the rezone of the Bond Road property.</p> <p>There is no confirmation that the sports complex can obtain funding for construction and ongoing maintenance, including wastewater discharge and road improvements. Taxpayers could end up with unsustainable tax burdens. We could end up with Raydient’s wish list for housing and commercial development being built, but no way for the community to proceed on the sports complex project due to inability to fully fund the project.</p> <p>This proposed housing development, sports complex, and commercial zone would be located on a critical aquifer recharge area, near mapped fish bearing streams, and a mapped wetland- putting our local drinking water resources and watershed health at risk. A sports complex including turf fields and large amounts of parking would cause high amount of impervious surface, stormwater discharge and wastewater. For instance, the septic discharge is estimated at 100,000 gallons a day.</p> <p>The rezoning proposal would displace numerous animal populations currently living on this site. The intensity of development would degrade the habitat and outdoor experience of Port Gamble Forest Heritage Park, with neighboring lighting, car trips, and user population.</p> <p>Both the Port Gamble S'klallam, &amp; the Suquamish Tribe opposes the rezoning of rural protection or urban restricted parcels to more intensive uses.</p> <p>The rezone and sports complex do not help with the target for affordable housing that the County is required to meet by the GMA. The houses will only be for high income earners - we do not need more gentrification in this area.</p> <p>I urge you to vote against the Raydient rezone request and proposed sports complex to keep development within the UGA as required by the GMA, protect areas of North Kitsap’s rural character, discourage suburban sprawl development, minimize additional traffic congestion, and protect our natural environment, water quality and habitat - the integral reasons we love living here so much.</p> <p>Sincerely - a concerned, young citizen, and community member who hopes to raise the next generation surrounded by the same beauty I was afforded - Devan Kleinman.</p>
40	1/27/2024	Jeff and Patricia Kirkham	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Hello,</p> <p>As longtime residents of Poulsbo, my wife and I feel it is important to advocate against Raydient's plans for North Kitsap Rezoning. We feel that allowing this project contradicts the philosophy of Urban Growth Areas and the Master Planning Process.</p> <p>Sports fields would be better suited at College Marketplace in Poulsbo OR near Kingston High School in Kingston. We do not believe in endless suburban sprawl in beautiful Kitsap county.</p> <p>Thank you and respectfully, Jeff + Patricia Kirkham, 18 year residents of Poulsbo</p>
41	1/27/2024	Cindy Wilkins	Land Use Reclass (Site Specific)	Raydient Reclassification	<a href="#">See page 17</a>

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42	1/28/2024	Juan Hernandez	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>County Commissioners,</p> <p>I am writing to urge you to support the proposed multigenerational outdoor and indoor sports and recreation complex led by our Kingston Rotary Club by approving the land rezoning off Stottlemeyer Road in Kingston/Poulsbo because it is the domino that will help us all address these issues and bring many benefits and opportunities for our county and community.</p> <p>I am writing to you as a coach and a sports enthusiast who has been living and working in Kitsap County for the last 7 years. I have witnessed the challenges and frustrations that our local sports teams and players face due to the lack of adequate and accessible sports facilities in our county. It has become very difficult to try and find facilities for our youth to practice basketball. This year I had over 120 youth signed up for basketball and only having 2 gyms to try to schedule practices for 10 teams is very difficult. I am writing to urge you to support the proposed indoor sports complex that will address these issues and bring many benefits and opportunities for our community.</p> <p>Kitsap County is a growing and dynamic place, with an estimated 1200 new families relocating here in the next five years. This means more people, more diversity, and more demand for services and amenities. One of the areas that needs improvement is our sports facilities. Currently, we have a shortage of adequate and accessible sports venues, especially for indoor sports. Our outdoor sports fields are often damaged and unusable due to the 250 days of severe weather conditions that we experience every year. This affects the quality and safety of our sports activities, as well as the morale and motivation of our players and coaches. Many times, we have had to delay, reschedule, or cancel games and practices due to the poor condition of the fields. Moreover, our residents must travel at least 30 minutes outside of the area to participate in water sports, such as swimming, diving, or water polo. KYSA currently does not have the ability to offer volleyball or lacrosse to our youth due to inadequate facilities.</p> <p>An indoor sports complex would address these issues by providing a state-of-the-art facility that can accommodate various sports, such as basketball, volleyball, soccer, swimming, and more. It would also offer locker rooms, restrooms, concession stands, and spectator seating. An indoor sports complex would allow us to enjoy sports all year round, regardless of the weather, and improve our health and fitness. It would also foster a sense of community and camaraderie among our residents, as we cheer for our local teams and celebrate our achievements.</p> <p>Moreover, an indoor sports complex would enhance the economy and attractiveness of our county. It would create jobs, generate revenue, and increase spending in our local businesses. It would also attract more tourists, visitors, and events to our county, such as tournaments, fundraisers, and more. It would make our county a more desirable place to live, work, and play.</p> <p>I understand that some of you may have concerns about the potential negative impacts of an indoor sports complex, such as congestion and crowding. However, I believe that these can be mitigated by careful planning and management. The proposed location of the indoor sports complex is in an area that has ample space and infrastructure to support it. The project will also follow the environmental and zoning regulations of our county.</p> <p>In conclusion, I hope that you will join me in supporting the indoor sports complex project. This project is a once-in-a-lifetime opportunity for our county, as it will provide us with more options and benefits for our sports, health, and economy. It will also reflect our county's vision and values, as we strive to create a vibrant, active, and prosperous community for ourselves and future generations.</p> <p>Thank you for your time and attention. Respectfully,</p> <p>Juan Hernandez KYSA Basketball AD</p>



Comprehensive Plan Comment Matrix - Comments Received through 4:30 p.m. April 11

Comment #	Date Received	Name	Category	Subcategories	Text
43	1/29/2024	Melanie Peters	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Good morning Commissioner Walters.</p> <p>My name is Melanie Peters, I live in Hansville WA, and own a small business in Poulsbo WA. I commute daily about 25 minutes each way, using Hansville Road and Bond Road in North Kitsap.</p> <p>I am urgently expressing my opposition to the Comprehensive Plan Update for North Kitsap County.</p> <p>I have been hearing for some time about the proposed rezoning of the area off Bond road in North Kitsap. While I have no problem with the current zoning of 1 home per 20 acres, the rezone (with a tease of “maybe” a YMCA and sports facilities along with new commercial development) would not only destroy natural habitat (as documented in the Kitsap Environmental Coalition’s written statement to the Planning Commission), but it would make a dangerous and deadly road even more deadly to commute through every day.</p> <p>The current Comprehensive Plan was put into place in order to protect our rural areas from over development. Allowing a corporate entity with a history of developing timberland into suburban sprawl areas to change our development is not only wrong, but is absolutely PERMANENT. Commercial development (and a brand new YMCA) is already planned and underway in Poulsbo, where the Comprehensive Plan is working to concentrate growth in a more urban setting. A setting where infrastructure and public support is abundant.</p> <p>We are fighting a David and Goliath battle here, they have just launched a \$250,000 PR campaign going door to door to push the idea of this new YMCA and sports fields. Unsuspecting neighbors are only hearing the message about new sports fields, and not being told about the major density changes this would create as well as the fact that THEY as tax payers would be on the hook for the millions and millions of dollars to build all of this.</p> <p>When you look at the math, the YMCA is under no obligation to build anything after it has been rezoned, and there is absolutely zero infrastructure in their plan to support the utilities, water runoff, and the deadly road traffic that would happen to this tiny secluded area.</p> <p>Please do not allow a rezone campaign to succeed. Keep the Comprehensive Plan the way it is, no updates. Do not allow a giant corporation to pillage our communities for a short term profit.</p> <p>Thank you for your time, Melanie Peters Rockin Ruby’s Records Poulsbo, WA</p>
44	1/29/2024	Judy Marks	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Commisioners,</p> <p>I am in opposition to the rezone proposed by Radient for the Bond Road/Port Gamble Road area. The current infrastructure is already taxed and the addition of 80 homes and the traffic generated by those homes is unfathomable. I imagine including a sports complex and rec center there would compound an already terrible situation.</p> <p>I am aware that there are already the plans and approval of hundreds of new homes in North Kitsap: Aborwood, the half built condos in Kingston, the Port Gamble rebuild to name a few. How will the traffic from those homes alone affect Bond, or Highway 3?</p> <p>I’ve been commuting from my home west of Poulsbo to a small business in Kingston for 20 years. The traffic has steadily increased. Often, when there is a blocking incident on Bond, I will take the Hwy 3 home. On a Thursday or Friday afternoon traffic is often backed up northbound to Pioneer Way by 3:00. That whole stretch of roadway is fronted by private driveways and small roads, whose residents will be greatly impacted by additional traffic trying to avoid the Bond Road congestion the rezone and subsequent sports complex will contribute to.</p> <p>I ask you simply regard the Growth Management act to protect our forests and waters, and the Comprehensive plan for the county to provide efficient transportation for our citizens, both existing and future.</p> <p>I appreciate consideration of these points when considering the rezone of our forests.</p> <p>Best, Judy Marks</p>

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45	1/29/2024	Julie Poor	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>My husband and I have lived north of Poulsbo for 24 years, voted in every election and watched the timber companies from Pope and Talbot through Raydient. with all their name changes, get what they want and walk away from being part of our community. Yes, they are in business to make money. But that doesn't mean they should get special privileges. Jon Rose has said several times at the meetings that they are happy to not rezone, sell the land to a developer at its current zoning and get out of Kitsap. I think that is by far the best choice for our community. I have a short list of reasons:</p> <p>1.The YMCA and Kingston Rotary have no money to build a Y or sports complex on the property. Even Jon Rose has said that would be way down the road, maybe decades to accomplish. 2.The property has very little available infrastructure. By the State's own study 307 is at maximum capacity in its current state and they have no plan to widen it or do any other improvements. Even 20 homes with 2 cars each, delivery vehicles and other servicers are going to make the road even more of a danger. Let alone if it is 80 homes. There is no sewer. There is no transit. Water might be available but that is up in the air still. I'm not sure about high-speed internet. 3.The proposed site has topographical issues to higher density building. 20 houses will be a stretch for a developer to make enough money on. I believe that is one reason they are asking for the rezone; it is not going to highly sought after by a developer at the current zoning. I'm sure this is the most important fact to Raydient. They have taken their offer of giving the land to the Rotary/YMCA off the table. They don't even know how much they would sell it to them for. Seems like a lot of open-ended questions for a company that wants out of Kitsap and won't have any stake in its future. 4.The already funded sports complex in Poulsbo has all the infrastructure in place, near shopping and other retail and services for parents to visit while their kids are at the complex. It is about 10 or 12 minutes farther down the road from Kingston. Those representing The Kingston Rotary at the "public meetings" have brought up that the YMCA in Silverdale is too far for them to drive their kids. The short drive to Poulsbo seems like a good compromise. 5.We have lived here through White Horse and Arborwood. They were not the right answer to more affordable housing then or now, which is what Kitsap County dearly needs or wants. I'm not alone with the concerns. Raydient has hired a PR firm and will not allow us to speak at their meetings. Our group does not have funding, but we are working on organizing to be heard. I think the County Commissioners would be wise to have a meeting with the public before they act on this. It does affect us as residents of North Kitsap. What you do on this rezone will affect the county forever. It isn't a one moment in time decision. Please consider the rural nature of North Kitsap. Places like this can't be made anymore. If we wanted to live in Seattle we would still be there. Yes change happens, but this is not good change.</p> <p>Thank you, Julie Poor</p>
46	1/29/2024	Lisa Salisbury	Land Use Reclass (Site Specific)	Raydient Reclassification	<a href="#">See pages 18-19</a>
47	1/30/2024	Jonathan Tudan	Housing Element	Housing, Economy	<p>In order to promote access to affordable housing in the county's rural zone, please reduce the CUP-ADU application fee, currently at \$5,969.65. The current fee is antithetical to affordable housing, considering the fact that additional building permit fees required to upgrade the property will be imposed. I kindly suggest lowering the CUP-ADU fee by a minimum of 50%. This lower amount will certainly be an incentive to add to our county's housing stock. Thank you!</p>
48	1/31/2024	Thomas Garrett	DDR	Environmental, DDR Edits	<p>Sent to Comprehensive Plan Update "Draft Development Regulations" on 1/30/2024 Add to Chapter 17.170 MINERAL RESOURCE OVERLAY (MRO)</p> <p>1. Surface mining operations shall not excavate within 500-horizontal feet from any pre-existing well used as a potable water supply. (possible well contamination) 2. Surface mining operations shall not excavate within 1000-ft horizontal feet from the shoreline (saltwater MHHW) and excavate no deeper than the surface elevation of the closest potable water well in the area. (possible saltwater intrusion) 3. Surface mining operations shall not be allowed within Level I or Level II critical aquifer recharge areas. 4. Surface mining operations shall not be allowed where contaminated runoff could enter any perineal or intermittent stream.</p>

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49	1/31/2024	Sasha Mahar	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Dear Kitsap County Commissioners,</p> <p>When I moved to Kingston I was stunned by its natural beauty and unique environment. I spend every moment I can in Kitsap’s great outdoors. I took a salmon docent class with Washington State University and learned about how important and vulnerable the forests and wetlands are, and how much depends on them to keeping the Puget Sound thriving. Now it appears that much of what makes this place gorgeous and important is being threatened by development that would make Kitsap another suburb of Seattle. The many wild residents of Kitsap don’t get very much representation in urban planning meetings, but I urge you to consider them. They are what makes this place the unique destination it is.</p> <p>A list of concerns about the Raydient request to rezone their 400 acres on Bond Road and the proposed sports complex, commercial zone, and increased density housing development. This is the wrong place for a sports complex and intense development.</p> <p>Here are my concerns:</p> <p>Growth Management Act: This project would create intense development in a rural area adjacent to the Port Gamble Heritage Park- disorganized sprawl that the Growth Management Act was designed to avoid. To promote responsible and sustainable growth, this type of dense project should be located in an urban setting with urban amenities. Our Rural areas are part of Kitsap’s beauty and character and need to be protected. Permitting this rezone sets a bad precedent; other developers will want to follow suit and the rural area will be turned into sprawl.</p> <p>Traffic: Traffic infrastructure already cannot handle the existing traffic. There is no sensible plan to deal with the traffic added by the sports complex, commercial zone, and additional homes outside one per 20 acres. There is no public transportation to the proposed sports complex site.</p> <p>Duplication of new sports centers: This proposed project is 3.8 miles from the proposed Poulsbo Event and Recreation Center (PERC), and planning for that project is already underway. The city of Poulsbo opposes the rezone of the Bond Road property.</p> <p>Viability of Funding: There is no confirmation that the sports complex can obtain funding for construction and ongoing maintenance, including wastewater discharge and road improvements. Taxpayers could end up with unsustainable tax burdens. We could end up with Raydient’s wish list for housing and commercial development being built, but no way for the community to proceed on the sports complex project due to inability to fully fund the project.</p> <p>Water and Environment: This proposed housing development, sports complex, and commercial zone would be located on a critical aquifer recharge area, near mapped fish bearing streams, and a mapped wetland- putting our local drinking water resources and watershed health at risk. A sports complex including turf fields and large amounts of parking would cause high amount of impervious surface, stormwater discharge and wastewater. For instance, the septic discharge is estimated at 100,000 gallons a day.</p> <p>Wildlife Habitat and Park environment: The rezoning proposal would displace numerous animal populations currently living on this site. The intensity of development would degrade the habitat and outdoor experience of Port Gamble Forest Heritage Park, with neighboring lighting, car trips, and user population.</p> <p>Tribal Concerns: Port Gamble S'Klallam Tribe opposes the Rezone on Bond Road.</p> <p>The Suquamish Tribe opposes the rezoning of rural protection or urban restricted parcels to more intensive uses.</p> <p>Affordable Housing Goals: The rezone and sports complex do not help with the target for affordable housing that the County is required to meet by the GMA. The houses will only be for high income earners.</p> <p>I urge you to vote against the Raydient rezone request and the proposed sports complex to keep development within the UGA as required by the GMA, protect areas of North Kitsap’s rural character, discourage suburban sprawl development, minimize additional traffic congestion, and protect our natural environment, water quality and habitat.</p> <p>Thank you for your consideration of this letter,</p> <p>Sasha Mahar</p>

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50	1/31/2024	John Horning	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Kitsap County Commissioners,</p> <p>When I moved to Kingston I was stunned by its natural beauty and unique environment. I spend every moment I can in Kitsap’s great outdoors. I've learned about how important and vulnerable the forests and wetlands are, and how much depends on them to keeping the Puget Sound thriving. Now it appears that much of what makes this place gorgeous and important is being threatened by development that would make Kitsap another suburb of Seattle. The many wild residents of Kitsap don’t get very much representation in urban planning meetings, but I urge you to consider them. They are what makes this place the unique destination it is.</p> <p>A list of concerns about the Raydient request to rezone their 400 acres on Bond Road and the proposed sports complex, commercial zone, and increased density housing development. This is the wrong place for a sports complex and intense development. Here are my concerns:</p> <p>Growth Management Act: This project would create intense development in a rural area adjacent to the Port Gamble Heritage Park- disorganized sprawl that the Growth Management Act was designed to avoid. To promote responsible and sustainable growth, this type of dense project should be located in an urban setting with urban amenities. Our Rural areas are part of Kitsap’s beauty and character and need to be protected. Permitting this rezone sets a bad precedent; other developers will want to follow suit and the rural area will be turned into sprawl.</p> <p>Traffic: Traffic infrastructure already cannot handle the existing traffic. There is no sensible plan to deal with the traffic added by the sports complex, commercial zone, and additional homes outside one per 20 acres. There is no public transportation to the proposed sports complex site.</p> <p>Duplication of new sports centers: This proposed project is 3.8 miles from the proposed Poulsbo Event and Recreation Center (PERC), and planning for that project is already underway. The city of Poulsbo opposes the rezone of the Bond Road property.</p> <p>Viability of Funding: There is no confirmation that the sports complex can obtain funding for construction and ongoing maintenance, including wastewater discharge and road improvements.</p> <p>Taxpayers could end up with unsustainable tax burdens. We could end up with Raydient’s wish list for housing and commercial development being built, but no way for the community to proceed on the sports complex project due to inability to fully fund the project.</p> <p>Water and Environment: This proposed housing development, sports complex, and commercial zone would be located on a critical aquifer recharge area, near mapped fish bearing streams, and a mapped wetland- putting our local drinking water resources and watershed health at risk. A sports complex including turf fields and large amounts of parking would cause high amount of impervious surface, stormwater discharge and wastewater. For instance, the septic discharge is estimated at 100,000 gallons a day.</p> <p>Wildlife Habitat and Park environment: The rezoning proposal would displace numerous animal populations currently living on this site. The intensity of development would degrade the habitat and outdoor experience of Port Gamble Forest Heritage Park, with neighboring lighting, car trips, and user population.</p> <p>Tribal Concerns: Port Gamble S'Klallam Tribe opposes the Rezone on Bond Road.</p> <p>The Suquamish Tribe opposes the rezoning of rural protection or urban restricted parcels to more intensive uses.</p> <p>Affordable Housing Goals: The rezone and sports complex do not help with the target for affordable housing that the County is required to meet by the GMA. The houses will only be for high income earners.</p> <p>I urge you to vote against the Raydient rezone request and the proposed sports complex to keep development within the UGA as required by the GMA, protect areas of North Kitsap’s rural character, discourage suburban sprawl development, minimize additional traffic congestion, and protect our natural environment, water quality and habitat.</p> <p>Thank you for your consideration of this letter, John Christian Horning</p>

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51	2/1/2024	Leslie and Joe Newman	Comp Plan	Land Use	<p>Good Afternoon Eric -</p> <p>We understand Kitsap County is considering revisions to the Comprehensive Plan for communities in Kitsap County including Manchester.</p> <p>We own 4 parcels of real estate in the Manchester area and have had recent interactions with the DCD and permitting process in Kitsap County and the local Manchester Community Advisory Council.</p> <p>Hopefully the county and the Commissioners will conduct listening sessions with property owners and business owners and invite feedback from all impacted.</p> <p>Managed growth that encapsulates parks, infrastructure, roads, schools, sidewalks, walkways, small business, development and support of sfr, multi- family, adu's/cottage homes allows for a broader tax base, investment in infrastructure, attractive cities, and housing options.</p> <p>Waterfront communities and destination communities such as Kirkland, Bellevue, Edmonds, West Seattle, Redmond, Walla Walla have done a great job of managed growth plus support of the above.</p> <p>It is our hope that the Level 3 plan is approved and adopted.</p> <p>Please let us know if you have any questions.</p> <p>Thank you</p> <p>Leslie and Joe Newman</p> <p>Residents of Manchester</p> <p>Small Business Owners</p> <p>Builder/Developers</p>
52	2/1/2024	Thomas Doty	Parks Element	Land Use, Environmental	<p>Kitsap County Parks Department's plan for development of Kitsap county parks would seem to have no ultimate limitation on future development. Responsive only to expectation of future human population increase. Not one word regarding the common expectation, supported by peer-reviewed science, of continued decline of endemic animal populations. Particularly hypocritical is the plan for endless paved trail development, leading to further genetic isolation of communities of small mammals (moles, voles, mice and shrews) and amphibians (frogs, salamanders and caecilians). This leads to inbreeding and genetic drift, a reduction in fitness, and eventually extinction of these small critters.</p> <p>Surveys conducted by North Kitsap Heritage Park stewards revealed a clear public preference (over 90%) for the retention of the narrow, permeable, natural surface trails we developed.</p>
53	2/1/2024	Anonymous	Transportation Element	Transportation	<p>Multi modal emphasis is a very bad idea, specifically in north kitsap (or any semi-rural area). you are adding quite a lot of traffic to bond road/104 through approved dense develoments, but you seem to have no REASONABLE plans to address this. i try to time usage for non commute hours but that does not work anymore. even going down the back way (miller bay/gunderson) does not work anymore. using a vehicle is all that works for this area. almost no one is going to bike or walk to poulso or silverdale from hansville if they have to shop. buses do not work for multipe stops. Adding a land to bond is the ONLY solution.</p>
54	2/2/2024	Roy Wildes	Comp Plan	Transportation	<p>For a very long time now I have heard of, and experienced, the backup on Silverdale Way. Many times I have experienced a backup extending from the Mall through to the traffic light on Provost and Newberry, in both directions. I participated in a team, I believe was called Vision 2020 a while back. It was an issue then and still is.</p> <p>I live off of Newberry Hill so this is counter-intuitive. When the work on the culvert to restore Strawberry Creek takes place take an opportunity to block off Silverdale way at about Byron.</p> <p>The Newberry exit will still serve Chico and locations to the west via Newberry and Provost to Anderson Hill, as well as residential between the round-about and the blockage of south Silverdale way.</p> <p>This will force the traffic flow to use the freeway exits of the Mall, Ridgetop and Bucklin Hill, as well as Silverdale way north, Greaves Way, and Anderson Hill. The bulk of traffic now seems to go simply through Silverdale as it is the shortest distance.</p> <p>A side benefit is this will change the character of Old town, giving it a more isolated feeling.</p> <p>I know it sounds crazy, but give it a thought.</p>

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55	2/3/2024	Randena Walsh	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Dear Kitsap County Commissioners,</p> <p>I am writing to express my concerns about the Raydient request to rezone their 400 acres on Bond Road and the proposed sports complex, commercial zone, and increased density housing development. I have lived in Kingston since 2002 and travel on Bond Road frequently, witnessing the many changes to our North Kitsap area. My concerns are as follows:</p> <p>The Growth Management Act was designed to avoid disorganized sprawl and to promote responsible and sustainable growth. The dense type of project Raydient has proposed should be located in an urban setting with urban amenities. Our rural areas make Kitsap County the beautiful place that it is, and need to be protected. Permitting this rezone sets a bad precedent, and would easily lead to sprawl, exactly what the GMA was created to avoid. Traffic is already heavy on Bond Road. The current rural designation of Raydient's property on Bond Road should remain in effect, in keeping with the rural surrounding environment.</p> <p>The city of Poulsbo opposes the rezone of the Bond Road property. Raydient's proposed project is just 3.8 miles from the proposed Poulsbo Event and Recreation Center. Planning for PERC is already underway. Poulsbo has the urban amenities and infrastructure to better support this type of development.</p> <p>Raydient's proposed housing development, sports complex and commercial zone would be located on a critical aquifer recharge area, near mapped fish bearing streams, and a mapped wetland, putting our local drinking water resources and watershed health at risk. A sports complex including turf fields and large amounts of parking would cause a high amount of impervious surface, stormwater discharge and wastewater.</p> <p>Wildlife habitat is lost whenever we increase development. Flora and fauna are displaced, and the loss is ours as well, as citizens of Kitsap County. I urge you to vote against the Raydient rezone request and keep development within the UGA as required by the GMA, protect areas of North Kitsap's rural character, and protect our natural environment, water quality and habitat.</p> <p>Randena Walsh</p>
					<p>Dear Kitsap County Commissioners,</p> <p>I am writing to express my concerns about the Raydient request to rezone their 400 acres on Bond Road and the proposed sports complex, commercial zone, and increased density housing development. This is the wrong place for a sports complex and intense development. While I had help with composing this letter it expresses exactly my wishes. Here are my concerns:</p> <p>Growth Management Act: This project would create intense development in a rural area adjacent to the Port Gamble Heritage Park- disorganized sprawl that the Growth Management Act was designed to avoid. To promote responsible and sustainable growth, this type of dense project should be located in an urban setting with urban amenities. Our Rural areas are part of Kitsap’s beauty and character and need to be protected. Permitting this rezone sets a bad precedent; other developers will want to follow suit and the rural area will be turned into sprawl.</p> <p>Traffic: Traffic infrastructure already cannot handle the existing traffic. There is no sensible plan to deal with the traffic added by the sports complex, commercial zone, and additional homes outside one per 20 acres. There is no public transportation to the proposed sports complex site.</p> <p>Duplication of new sports centers: This proposed project is 3.8 miles from the proposed Poulsbo Event and Recreation Center (PERC), and planning for that project is already underway. The city of</p>



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56	2/4/2024	Chris Heinlein	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Poulsbo opposes the rezone of the Bond Road property.</p> <p>Viability of Funding: There is no confirmation that the sports complex can obtain funding for construction and ongoing maintenance, including wastewater discharge and road improvements.</p> <p>Taxpayers could end up with unsustainable tax burdens. We could end up with Raydient’s wish list for housing and commercial development being built, but no way for the community to proceed on the sports complex project due to inability to fully fund the project.</p> <p>Water and Environment: This proposed housing development, sports complex, and commercial zone would be located on a critical aquifer recharge area, near mapped fish bearing streams, and a mapped wetland- putting our local drinking water resources and watershed health at risk. A sports complex including turf fields and large amounts of parking would cause high amount of impervious surface, stormwater discharge and wastewater. For instance, the septic discharge is estimated at 100,000 gallons a day.</p> <p>Wildlife Habitat and Park environment: The rezoning proposal would displace numerous animal populations currently living on this site. The intensity of development would degrade the habitat and outdoor experience of Port Gamble Forest Heritage Park, with neighboring lighting, car trips, and user population.</p> <p>Tribal Concerns: Port Gamble S'Klallam Tribe opposes the Rezone on Bond Road.</p> <p>The Suquamish Tribe opposes the rezoning of rural protection or urban restricted parcels to more intensive uses.</p> <p>Affordable Housing Goals: The rezone and sports complex do not help with the target for affordable housing that the County is required to meet by the GMA. The houses will only be for high income earners.</p> <p>I urge you to vote against the Raydient rezone request and the proposed sports complex to keep development within the UGA as required by the GMA, protect areas of North Kitsap’s rural character, discourage suburban sprawl development, minimize additional traffic congestion, and protect our natural environment, water quality and habitat.</p> <p>Chris Heinlein</p>
57	2/5/2024	Carma Foley	Comp Plan	Land Use, Housing	<p>Greetings,</p> <p>As a community planning department I would like to see more emphasis on how any projects promote a sense of community.</p> <p>Random housing thrown up here and there by out of state or out of our area developers have no interest in making this a livable community.</p> <p>Many of our societal ills can be helped by providing housing that promotes community engagement for people of various walks of life.</p> <p>Imagine will you for a moment where housing encourages interaction and a neighborhood feeling. We know how these neighborhoods can be done through careful planning. Houses facing inward with garages in the alley or back of the house. Playgrounds, gardens, and community centers in the middle area for all to share. Walking paths, bus stops, and other transportation options closeby.</p> <p>Now is the time to review what we want not only for ourselves but for generations to come.</p> <p>If we need examples there are plenty to be found in our state, country, and other countries around the world. Many of these housing areas have been in existence for centuries. Maybe we can imagine this too.</p> <p>Respectfully,</p> <p>Carma L. Foley</p>
					<p>Dear Kitsap County Commissioners,</p> <p>Thanks for reading this. I am writing to express my serious concerns about the Raydient request to rezone their 400 acres on Bond Road and the proposed sports complex, commercial zone, and increased density housing development. This is the wrong place for a sports complex and intense development.</p> <p>Here are my concerns:</p> <p>Growth Management Act: This project would create intense development in a rural area adjacent to the Port Gamble Heritage Park- disorganized sprawl that the Growth Management Act was designed to avoid. To promote responsible and sustainable growth, this type of dense project should be located in an urban setting with urban amenities. Our Rural areas are part of Kitsap’s beauty and character and need to be protected. Permitting this rezone sets a bad precedent; other developers will want to follow suit and the rural area will be turned into sprawl.</p> <p>Traffic: Traffic infrastructure already cannot handle the existing traffic. There is no sensible plan to deal with the traffic added by the sports complex, commercial zone, and additional homes outside one per 20 acres. There is no public transportation to the proposed sports complex site.</p> <p>Duplication of new sports centers: This proposed project is 3.8 miles from the proposed Poulsbo Event and Recreation Center (PERC), and planning for that project is already underway. The city of</p>



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Comment #	Date Received	Name	Category	Subcategories	Text
58	2/5/2024	Kevin Smith	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Poulsbo opposes the rezone of the Bond Road property.</p> <p>Viability of Funding: There is no confirmation that the sports complex can obtain funding for construction and ongoing maintenance, including wastewater discharge and road improvements.</p> <p>Taxpayers could end up with unsustainable tax burdens. We could end up with Raydient’s wish list for housing and commercial development being built, but no way for the community to proceed on the sports complex project due to inability to fully fund the project.</p> <p>Water and Environment: This proposed housing development, sports complex, and commercial zone would be located on a critical aquifer recharge area, near mapped fish bearing streams, and a mapped wetland- putting our local drinking water resources and watershed health at risk. A sports complex including turf fields and large amounts of parking would cause high amount of impervious surface, stormwater discharge and wastewater. For instance, the septic discharge is estimated at 100,000 gallons a day.</p> <p>Wildlife Habitat and Park environment: The rezoning proposal would displace numerous animal populations currently living on this site. The intensity of development would degrade the habitat and outdoor experience of Port Gamble Forest Heritage Park, with neighboring lighting, car trips, and user population.</p> <p>Tribal Concerns: Port Gamble S'Klallam Tribe opposes the Rezone on Bond Road.</p> <p>The Suquamish Tribe opposes the rezoning of rural protection or urban restricted parcels to more intensive uses.</p> <p>Affordable Housing Goals: The rezone and sports complex do not help with the target for affordable housing that the County is required to meet by the GMA. The houses will only be for high income earners.</p> <p>I urge you to vote against the Raydient rezone request and the proposed sports complex to keep development within the UGA as required by the GMA, protect areas of North Kitsap’s rural character, discourage suburban sprawl development, minimize additional traffic congestion, and protect our natural environment, water quality and habitat.</p> <p>Sincere regards, Kevin Smith</p>
59	2/5/2024	Kathryn Wilham	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Dear Kitsap County Commissioners,</p> <p>I am worried about the Raydient request to rezone their 400 acres on Bond Road to make possible the proposed sports complex, commercial zone, and increased density housing development. This is the wrong place for a sports complex and intense development.</p> <p>Growth Management Act: This project would create intense development in a rural area adjacent to the Port Gamble Heritage Park, which is exactly the type of sprawl that the Growth Management Act was designed to avoid. To promote responsible and sustainable growth, this type of dense project should be located in an urban setting with urban amenities. Permitting this rezone sets a bad precedent; other developers will want to follow suit, and our rural areas will become like the suburban sprawl of Southern California I managed to leave behind in 1990.</p> <p>Traffic: Our present traffic infrastructure cannot handle the existing traffic. And I’ve not read about any realistic plan to deal with the traffic added by this rezoning proposition.</p> <p>Duplication of new sports centers: This proposed project is 3.8 miles from the proposed Poulsbo Event and Recreation Center (PERC), and planning for that project is already underway. The current and even near future population of North Kitsap does not need a second sports center.</p> <p>Viability of Funding: There is no confirmation that the sports complex can obtain funding for construction and ongoing maintenance, including wastewater discharge and road improvements.</p> <p>Taxpayers could end up with unsustainable tax burdens. We could end up with Raydient’s wish list for housing and commercial development being built, but no way for the community to proceed on the sports complex project due to inability to fully fund the project.</p> <p>Water and Environment: This proposed housing development, sports complex, and commercial zone would be located on a critical aquifer recharge area, near mapped fish bearing streams, and a mapped wetland, thereby putting our local drinking water resources and watershed health at risk. A sports complex including turf fields and large amounts of parking would cause high amount of impervious surface, stormwater discharge and wastewater. For instance, the septic discharge is estimated at 100,000 gallons a day.</p> <p>Wildlife Habitat and Park environment: The rezoning proposal would displace numerous animal populations currently living on this site. The intensity of development would degrade the habitat and outdoor experience of Port Gamble Forest Heritage Park.</p> <p>Tribal Concerns: Port Gamble S'Klallam Tribe opposes the Rezone on Bond Road.</p> <p>The Suquamish Tribe opposes the rezoning of rural protection or urban restricted parcels to more intensive uses.</p> <p>Affordable Housing Goals: The rezone and sports complex do not help with the target for affordable housing that the County is required to meet by the GMA. The houses will only be for high income earners.</p> <p>I urge you to vote against the Raydient rezone request and the proposed sports complex to keep development within the UGA as required by the GMA, protect areas of North Kitsap’s rural character, discourage suburban sprawl development, minimize additional traffic congestion, and protect our natural environment, water quality and habitat.</p> <p>Regards, Kathryn Wilham</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
60	2/5/2024	Elmo Paige	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Dear Kitsap County Commissioners,</p> <p>As a recent new resident of rural Kitsap County I highly value the rural and environmental assets as they are in this county and believe that any new development must be done within the existing urban centers.</p> <p>I am writing to express my concerns about the Raydient request to rezone their 400 acres on Bond Road and the proposed sports complex, commercial zone, and increased density housing development. This is the wrong place for a sports complex and intense development.</p> <p>Here are my concerns:</p> <p>Growth Management Act: This project would create intense development in a rural area adjacent to the Port Gamble Heritage Park- disorganized sprawl that the Growth Management Act was designed to avoid. To promote responsible and sustainable growth, this type of dense project should be located in an urban setting with urban amenities. Our Rural areas are part of Kitsap’s beauty and character and need to be protected. Permitting this rezone sets a bad precedent; other developers will want to follow suit and the rural area will be turned into sprawl.</p> <p>Traffic: Traffic infrastructure already cannot handle the existing traffic. There is no sensible plan to deal with the traffic added by the sports complex, commercial zone, and additional homes outside one per 20 acres. There is no public transportation to the proposed sports complex site.</p> <p>Duplication of new sports centers: This proposed project is 3.8 miles from the proposed Poulsbo Event and Recreation Center (PERC), and planning for that project is already underway. The city of Poulsbo opposes the rezone of the Bond Road property.</p> <p>Viability of Funding: There is no confirmation that the sports complex can obtain funding for construction and ongoing maintenance, including wastewater discharge and road improvements. Taxpayers could end up with unsustainable tax burdens. We could end up with Raydient’s wish list for housing and commercial development being built, but no way for the community to proceed on the sports complex project due to inability to fully fund the project.</p> <p>Water and Environment: This proposed housing development, sports complex, and commercial zone would be located on a critical aquifer recharge area, near mapped fish bearing streams, and a mapped wetland- putting our local drinking water resources and watershed health at risk. A sports complex including turf fields and large amounts of parking would cause high amount of impervious surface, stormwater discharge and wastewater. For instance, the septic discharge is estimated at 100,000 gallons a day.</p> <p>Wildlife Habitat and Park environment:The rezoning proposal would displace numerous animal populations currently living on this site. The intensity of development would degrade the habitat and outdoor experience of Port Gamble Forest Heritage Park, with neighboring lighting, car trips, and user population.</p> <p>Tribal Concerns: Port Gamble S'Klallam Tribe opposes the Rezone on Bond Road.</p> <p>The Suquamish Tribe opposes the rezoning of rural protection or urban restricted parcels to more intensive uses.</p> <p>Affordable HousingGoals: The rezone and sports complex do not help with the target for affordable housing that the County is required to meet by the GMA. The houses will only be for high income earners.</p> <p>I urge you to vote against the Raydient rezone request and the proposed sports complex to keep development within the UGA as required by the GMA, protect areas of North Kitsap’s rural character, discourage suburban sprawl development, minimize additional traffic congestion, and protect our natural environment, water quality and habitat.</p> <p>Thank you for your consideration and willingness to vote to keep our county from becoming over run by poorly planned urban sprawl.</p> <p>Elmo Paige</p>
61	2/6/2024	Marion Allen	Environmental Element	Environmental, Comp Plan Edits	<p>Hi Kirvie, I have been taking a look at the draft comp plan with regard to the environment section. I am one of two leaders of the Kitsap County Native Plants , a group we started about a year ago and have already over 1,200 people. We lead native plant hikes weekly as well as some other events. It seems you have done a lot of interesting projects as well. I have one tiny request regarding the section on the environment. Could we use a more appropriate photo for the chapter. It looks too much like someone’s manicured yard instead of a natural environment that would include native habitat. I know it seems like a strange request but I have been all over Kitsap and it would be so nice to have a natural setting. I have many photos you could use and you probably didn’t even get to choose.</p> <p>I am enjoying the vision of your writing and there are many more who have the same vision. Please, join our group on facebook and come for a native plant walk sometime!</p> <p>Sincerely, Marion Allen</p>

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62	2/6/2024	Marion Allen	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>In many ways I am one of those optimistic environmentalists. I am a big lover and supporter of our Port Gamble Forest. I get caught up in the obstacle of trying to educate people in the facts that climate change is imminent and we need to hyper focus on that immediately.</p> <p>With the big 400 acre rezone issue in North Kitsap, it seems obvious to many of us that the best solution would be to put that land into the Heritage park. We have no wildlife preserves in our county and it seems like this could be as close as we might get.</p> <p>The biggest drawback, of course, is where to get the money. Having recently been involved with the KPPD, that seems like one of the most obvious sources. It seems like we could come up with a much better plan for this park than making it into a mountain bike destination for Port Gamble/Radiant to make a profit off.</p> <p>Climate change is coming and it may be the planet’s chance to eject humans off, like a dog getting rid of its fleas! If we don’t act now to make our county more climate resilient there may be no way for our children’s children to survive. The new Kitsap County Comprehensive Plan needs to focus on Climate change and Climate Resilience.</p> <p>Marion Allen, Poulsbo resident for 35 years and park volunteer.</p>
63	2/6/2024	Ruth Westergaard	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Dear Commissioners Rolfes, Walters, and Garrido,</p> <p>Please consider the adverse ramifications of rezoning the property owned by the Raydient Corporation located north of Bond Road and adjacent to Port Gamble Forest Heritage Park. Rezoning this land between Kingston and Poulsbo to allow for a sprawling housing development in order to also accommodate a sports complex makes no sense to me.</p> <p>Housing efforts should be concentrated in already established urban areas and the focus should be on affordability and accessibility. Transportation around Kitsap County and to points beyond without a car is already a nightmare. Creating a housing complex around a youth-oriented sports complex outside of already established urban growth areas is counter to growth that allows for safe access by youth and adults without a car.</p> <p>We need to concentrate on improving the housing density and affordability in already established urban zones. Our towns and cities should be reconfigured to encourage safe walking and bicycling to schools, jobs, shopping, and recreation. We should not be rezoning rural land in order to turn it into suburban sprawl.</p> <p>Respectfully, Ruth Westergaard</p>
64	2/7/2024	Peter Tack	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Dear Commissioner Walters,</p> <p>I am a North Kitsap resident writing to object to the Bond Road sports complex. Proposed zoning changes are detrimental to North Kitsap.</p> <ul style="list-style-type: none"><li>•The sports complex is out of character for North Kitsap.</li><li>•The proposed location is too far from urban centers and would increase traffic.</li><li>•It would come at the cost of existing wilderness recreation not possible in more urban areas.</li><li>•Increased housing density is out of character with the North Kitsap community.</li><li>• Development of the property would impact aquifer replenishment and wildlife.</li><li>•The Heritage Park is a unique asset for Kitsap residents.</li></ul> <p>Heritage Park and adjacent property is a unique asset for Kitsap County. The Comprehensive Plan and Zoning should recognize this and not make changes that will irreversibly diminish the open space we have left.</p> <p>Sincerely, Peter Tack</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
65	2/7/2024	Niki Quester	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>To Kitsap County Commissioners: Re: Raydient Request To Rezone their 400 acres on Bond Road I am writing to you to voice my opinion about the rezone request. I am opposed to this request. Raydient is a company that watches out for its shareholders, not what is best for the citizens of Kitsap County!</p> <p>Thank you for all your hard work for Kitsap County!</p> <p>I look forward to hearing your opinion on this request.</p> <p>Sincerely, Niki Quester</p>
66	2/9/2024	Gloria Edwards	Land Use Reclass (Site Specific)	Land Use, Housing	<p>Hello again,</p> <p>Still hoping to see some changes, and it does look a bit more hopeful. Comments attached.</p> <p>Thank you , Gloria Edwards <a href="#">See attachment on page 20</a></p>
67	2/14/2024	Jennifer Shultis and Richard Benoit	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Dear Kitsap County,</p> <p>I strongly object to this proposal to rezone for many reasons. The Port Gamble lands, regardless of whether they are part of the Heritage Park or privately owned, are connected and it's very important that they stay in current use.</p> <p>I understand that Raydient has a business reason to develop this land and entice the citizens to support the development, but as a community, we have a moral responsibility to act deliberately and not for convenience today.</p> <p>The earth is in crisis and we have to stop acting as if this is someone else's problem, just because we are fortunate to live in one of the few areas of the country not yet being dramatically impacted by climate change/weather. This is our problem too and it is already at our door stop. There are things we do today that have long lasting and permanent impact and this decision is one of those. Which one is going to tip the pendulum too far in one direction? Let's be smart and not find out. This is not "someone else's problem"-this is our problem. Our choice. We have wildlife in this area already being displaced by human expansion and this is one of the few places barely large enough for animals like cougars and bear to call home. We have to stop encroaching on them. Haven't we learned our lesson yet about telling "residents" of land that we now "own" it and that they will need to move on so we can use the land as we see fit?</p> <p>This area is a jewel in Kitsap County and once it is gone, it's gone forever. Let them build 1 house per 20 acres or 5 acres and close the trails. Whatever they are allowed within the currenting land zoning-that's fine. We have, in my opinion, too many trails and too many people already in this area. And we are just making it worse by building roads into these lands and the proposed bike paths.</p> <p>I implore Kitsap County to reject this proposal. This is not a two-way door- it will be gone forever once this change is allowed through and it will also set a precedent for other areas. After all, if it works here then Raydient and other corporations now have the playbook on how to do it elsewhere and we have written it for them.</p> <p>Thank you, Jennifer Shultis and Richard Benoit Kingston, WA</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
68	2/14/2024	Dennis McCrohan	Comp Plan	Land Use	<p>Hi-</p> <p>My question is mainly a historical one, how did the lots along Apple Tree Cove come to be zoned UL? It seems sort of bizarre to me given that these are all subject to strict Shoreline Management laws, and also the ones on South Kingston Rd don't even have sewer (and as far as I am able to determine, there is no plan for there ever to be sewer on South Kingston Rd). In the planning for future population growth within the UGA, are you assuming that these lots will actually be developed to 5-9 units per acre?</p> <p>Thanks,</p> <p>Dennis McCrohan</p>
69	2/14/2024	Russ Tanner	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Dear Commissioner Walters,</p> <p>I am writing to express my concerns about the Raydient request to rezone their 400 acres on Bond Road and the proposed sports complex, commercial zone, and increased density housing development. This is the wrong place for a sports complex and intense development.</p> <p>I have lived in Poulsbo for almost 30 years. My family and I regularly use the Port Gamble Heritage Park trail system. My wife and I take our dog for daily walks, while my kids and I ride the mountain bike trails at least twice a week. As one of the founders of the North Kitsap Mountain Vikes youth bike club, and I can tell you how important this resource is to the citizens of Kitsap County. The kids that I have coached over the years thrive when given the chance to put down the video game controllers and enjoy the forest on a mountain bike.</p> <p>My worry is that this rezone will extend the sprawl that is so prevalent everywhere else to this special place. It will increase traffic, destroy the forest, displace wildlife, intrude on the tribal land of the S'Kallam Tribe, and degrade one of Kitsap County's most beautiful areas. Once this is done, it can never be undone.</p> <p>The promise of a sports complex is cover by Raydient meant to buy off the community so that they can extract as much money from the land as possible. A YMCA sports complex does not provide free access to the citizens of Kitsap County. They charge a fee to join, and a monthly fee to belong. This rezone request is not about children, soccer fields, or bettering the community. It is about profit at any cost for Raydient.</p> <p>I urge you to not approve the rezone. The long-term damage to our forest is not worth the cost.</p> <p>Very Respectfully,</p> <p>Russ Tanner</p>
70	2/15/2024	Deborah Weinmann	Transportation Element	Comp Plan Edits, Transportation	<a href="#">See page 21</a>
71	2/15/2024	Joe Crell	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Hello Ms. Walters,</p> <p>I’m writing to express my opposition to the Stottlemeyer Raydient rezone effort. I support the Comprehensive Plan goal of concentrating development in the Urban Growth areas while limiting growth in Rural areas.</p> <p>My wife and I have lived in our home in North Kitsap since 1991. It’s very important to for the County to manage growth and limit sprawl.</p> <p>I support the Poulsbo PERC plan and see no overall benefit to allow the Raydient rezone application.</p> <p>Thank you for your attention to this matter.</p> <p>Respectfully, Joe Crell</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
72	2/15/2024	KCAC	Comp Plan	Land Use	<a href="#">See page 22</a>
73	2/15/2024	KCAC	Comp Plan	Land Use, Housing	<a href="#">See pages 23-26</a>
74	2/15/2024	KCAC	Comp Plan	Land Use, Housing	<a href="#">See page 27</a>
					<p>ENVIRONMENT</p> <p>-On page 3 of the draft is text that reads as follows: “the County’s deep commitment to maintaining and restoring ecosystems via habitat conservation, restoration of waterways, and reduction of greenhouse gas emissions.” My experience is that the county is not currently demonstrating a strong commitment to either maintaining or restoring habitat but is instead bowing to the wishes of developers to allow intrusion into what on paper are critical areas. There is a continued trend towards protecting the right to develop land over the right of nature to exist, flourish or rebound from past insults. This citizen calls upon the county to realize that the environment could survive without humans but humans cannot survive without a healthy environment. Set real protective boundaries to critical areas that are free of variances that cater to builders.</p> <p>-On page 47 is the statement, “The County has adopted a Critical Areas Ordinance which protects wetlands, fish and wildlife habitat conservation areas, geologically hazardous areas, frequently flooded areas, and critical aquifer recharge areas from the impacts of development and people from the consequences of developing in unsuitable areas.” These CAOs are meaningless if not rigorously enforced and protected. Too often the county grants variances, sometimes as much as 88-percent of a critical area buffer so as to not be guilty of a “taking” of property. Put teeth into our CAOs and also provide a means to compensate property owners. If eminent domain is used to acquire lands for the public good then we could go as far as that for a protected environment that serves the good of all. As mentioned earlier in my comments, if a reduced property tax seems to be a short-term loss, it is made up with a long-term healthy place we’d all be able to live in. Also on the same page is, “For County residents, the term rural also defines a philosophy of living and a quality of life. This quality of life includes a sense of quiet, community, and a slower pace of life. Rural characteristics include the abundance of trees, access to recreation, views of water and mountains, and a quiet, unregimented atmosphere. The elements of rural character also include the dynamic natural systems abundant in Kitsap County which can be vulnerable to human and natural change. Rural goals and policies also recognize that rural areas and communities have unique historical characters, appearances, and functions that should be retained and enhanced.” These are the characteristics of why so many of us choose to live here and not in some barren cityscape devoid of these elements. Do all you can as a county to protect these rural areas and DENY rezone requests from Raydient near Port Gamble Heritage Park, from those wanting to build near Island Lake or at Enetai.</p> <p>-On page 69 it states</p>

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75	2/19/2024	Doug Hayman	Environmental Element	Environmental, Land Use, CAO, Comp Plan Edits	<p>“Kitsap County protects the natural environment in part through its adopted Critical Areas Ordinance (CAO)”</p> <p>This sounds great but the reality is that Kitsap DCD leans towards protecting property owners and developers to grant variances that ignore the buffers meant to protect critical areas.</p> <p>-On page 71 it reads, “No Net Loss is a standard that ensures new developments do not introduce new impacts that decrease ecological functions. If impacts do occur, projects must mitigate those impacts to demonstrate no net loss.”</p> <p>This sounds good in theory but the county is understaffed and lacks the ability to do the necessary monitoring needed to measure before and after data necessary to show that no net loss has occurred.</p> <p>-on page 73 it states, “Environment Strategy 1.i. Submit the required annual report to the Federal Emergency Management Agency regarding Kitsap County’s status on review of projects for compliance with the National Flood Insurance Program (NFIP) Biological Opinion Puget Sound, as well as progress towards achieving programmatic compliance.”</p> <p>The county needs to integrate LiDAR to more accurately map areas that are at risk for flooding. The existing flood areas use averages that don't reflect the Best Available Science.</p> <p>-On page 74 it states, “Environment Policy 3.3. Continuously improve mapping, inventory, and baseline information of natural assets and their condition.”</p> <p>I’m all for this by replacing PDF versions of maps with online GIS maps. The county knows that the stream locations need updating for accuracy. And since LiDAR data is already available from WA DNR, we should make full use of it.</p> <p>-on page 77 it says, “Environment Strategy 6.a. Support and incentivize voluntary stream, wetland, riparian, and shoreline restoration and preservation efforts.”</p> <p>I fully support this. It would help volunteers to be granted access to such streams and wetlands with some coordination from the county where these people could gain access without being shot or attacked by dogs and other risks. This needs to be planned out well to succeed.</p>
					<p>LAND USE</p> <p>-On page 11 it says, “The vision for rural areas and communities is to retain and enhance unique historical character, appearance, and function, including recreation and natural resource activities, such as forestry, agriculture, and mining, that contribute to the rural character and economy.”</p> <p>This is why the county should deny the rezoning requests for Raydient and the companies trying to develop at Island Lake and Enetai. Leave these rural places rural and drive development to more appropriate areas like what appears in the paragraph that follows that one: “direct the majority of growth toward urban areas, provide greater distinction between urban and rural areas”</p>



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Comment #	Date Received	Name	Category	Subcategories	Text
					<p>-On page 15 is a table showing “Growth to Land Capacity” for all three alternatives for rural lands showed “zero” and the table that followed had “N/A” all the way across the row. Why even include this if it provides no decision point for the county commissioners?</p> <p>-On page 22, the map for Alternative 3 for District 1 implies that the Raydient rezone is approved as it shows different coloration that correlates with the parcels they want to change from 1 DU/20 to something out of character for maintaining the rural structure of Kitsap County. This rezone request should be denied as it will both decrease the rural lands of the county but will also fail to provide affordable housing for the citizens of Kitsap. It would only make Jon Rose and his Raydient out-of-state corporation more money with no benefit to the community.</p> <p>-On page 32 it states, both “Land Use Policy 4.2. Property owners are to be protected from arbitrary and capricious land use decisions and actions.” And “Land Use Strategy 4.a. Compensation at fair market value shall be paid when property is taken wholly for public purposes.” We need the county to build in mechanisms to both protect critical areas AND protect property owners. Those who already own lands that contain critical areas should be provided tax incentives to NOT develop on ANY Critical Area buffer. If you own 2-acres and one is encumbered with critical areas, then you should pay property tax for 1-acre. What appears to be a loss in property tax income from such a change is in reality a gain for the county in the form of a healthy environment that supports us and all life forms. And for those properties about to be sold with a possible motivation to build, there should be clearly defined restrictions to what the buyer should expect to be able to do. With the above mentioned parcel they should know via the title or other legal mechanisms that you can only build on one of the two acres but would also only be taxed for one acre.</p> <p>-On page 42 it says, “Land Use Policy 10.7. Accommodate affordability and flexibility in multifamily development through generous provisions for building height and density, reduced setback requirements, and encouragement of mixed attached housing types.” But then states Alt 2 only. I support such incentives but why can these not be embraced with any of the alternatives? This whole mix and match elements you say may happen runs into conflict with “alt 2 only” kinds of statements. Ditto on this point where Riparian Management Zones (RMZs) are talked about by the county as supposedly only available for Alt 2. One could expand a UGA and when you crossed into an RMZ, just honor the RMZ buffer and go a bit further to the East, West, North or South.</p> <p>-On page 43 it says, “Developments integrate trees and landscaping elements to enhance the streetscape character, provide environmental benefits, screen unwanted views, and create comfortable human environments.” This sounds good on paper, or an online document, but if a builder want to maximize the square footage of one or more buildings on their parcels, they’ll cut all the so-called danger trees down. Don’t allow the removal of mature trees that do carbon sequestration and replace them with small ornamental trees and claim that you’ve met this goal. Truly protect as many existing trees as possible. Also on the same page is, “Land Use Strategy 11.c. Explore options and opportunities for public-private partnerships that leverage strategic investment with developments that meet community design objectives.” This needs to NOT be at the expense of the general public good. Case in point is the phase 4,5, and 6 of Arborwood where developer Taylor Morrison and the county worked together and kept legal conversations hidden from the public. The county is supposed to represent the people and be answerable to the citizens, not beholden to a private out of state developer.</p> <p>-On page 45 it says, “Land Use Policy 14.1 Consider development patterns that reduce sprawl, use urban land more efficiently, and incorporate feasible, innovative, and sustainable practices.” I support this and hence call on the county to NOT allow rural lands to be rezoned for the benefit of private, out-of-state developers that does not serve the needs of all citizens of Kitsap County. Look at this policy, see the inverse of what that would be and do not do the inverse.</p> <p>It may seem logical on the one hand to acknowledge load limits for a bus or airplane. You can’t exceed those limits and pushing beyond them has greater and greater consequence. Likewise, there is a carrying capacity to a physical space including Kitsap County. We cannot put 2-billion people here without a serious degradation. So, despite future population growth numbers tossed around, we need to be cognizant of the fact that there will be a limit we’d approach beyond which life would be worse. Just because some want to develop every bit of land does not mean they should be granted unrestricted growth.</p> <p>-On page 50 is mentioned, “The former lumber mill site is planned for major redevelopment that was approved as part of a Development Agreement in 2021. Kitsap Public Utility District provides water service and oversees sewer treatment. Sewer conveyance is provided by Rayonier, the site owner.” Many in the county have been surprised to learn of some of these agreements being entered into by those who should be answerable to all. The citizens of Kitsap County should always be</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
76	2/19/2024	Doug Hayman	Land Use Element	Land Use, Raydient Reclassification, Island Lake Reclassification	<p>informed of such proposals with no hidden, backroom deals being made that impact us as a whole.</p> <p>Page 179 reeks of influence by folks like Raydient with, “Kingston Strategy 17.a. Acquire land and develop sports fields, courts, and playground facilities as the population growth warrants to serve the greater Kingston area to support local, regional, and invitational sports events to include:</p> <ul style="list-style-type: none"><li>•Baseball and softball fields</li><li>•Fields for soccer, lacrosse, and ultimate frisbee</li><li>•Football fields</li><li>•Outdoor basketball courts</li><li>•Pickleball and tennis courts</li><li>•Frisbee golf course”</li></ul> <p>We need to separate Raydient’s request for a rezone near Port Gamble from their vague, lofty promises towards providing a place for such facilities as they have clearly stated that they will not be paying for these (but instead just benefiting from a zoning change).</p>
77	2/19/2024	Doug Hayman	Housing Element	Housing, Land Use	<p>HOUSING</p> <p>-On page 4 of the draft is the bullet point: “Increase housing choices and affordability.” How is it that Kitsap County will achieve this in reality and not just in a document? If the county amends the comprehensive plan and associated rules and regulations, they could tell developers that there will be no new building permits for high-end homes until we’ve met our goals for the missing middle and lower income tiers. Tell these people that you’ll expedite permits for multi-family units in designated UGAs and make meeting this goal a reality.</p> <p>-On page 59 is states, “More than half of Kitsap County residents are cost-burdened, spending more than a third of their income on housing. Affordable housing is difficult to attain in the community. The median cost of a home in Kitsap, excluding Bainbridge Island, is more than \$500,000. Meanwhile, a new garden-style one-bedroom apartment in Kitsap, regardless of location, starts at around \$1,700 a month.” And yet the county has not yet but should be considering a mechanism to stop development of unaffordable homes until we’ve met our housing needs for the missing middle or lower income citizens. We can regulate speed limits, wearing of clothing in public spaces and so on. Surely, we can stop building unaffordable homes to truly meet our housing needs.</p> <p>-on page 82, “Specifically, the GMA was amended to require that fully planning counties and cities “plan for and accommodate” housing that is affordable to all economic segments of the population. They must also provide an inventory and analysis of existing and projected housing needs that identifies the number of housing units needed to accommodate projected growth, including units for moderate, low, very low, and extremely low-income households as well as special housing types like emergency housing, emergency shelters, and permanent supportive housing.” This is very important. Treat our development permits like a buffet line. Tell developers, “Sorry, we’re all out of high-end luxury home permits but we do have 3,000 permits for missing middle housing and those come with a side-order of expedited permitting.” Stop assuming that there is nothing that the county can do to change the affordable housing issue.</p> <p>-page 94 states at least aspirational goals towards housing with, “Housing Strategy 2.b. Develop incentive programs to increase housing in the 30-80% AMI range, such as voluntary inclusionary zoning, Multi-Family Tax Exemption, or expedited permit review.” Make this a reality. Pretend that this improvement will positively impact someone you care about.</p> <p>On page 234 there is mention of Accessory Dwelling Units, (ADUs) and it is important not only in Suquamish but throughout the county to prevent such units from becoming short term Air BnB money makers when we have an affordable housing crisis.</p>

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78	2/19/2024	Doug Hayman	Economic Development Element	Economic Development	<p>ECONOMIC DEVELOPMENT</p> <p>-On page 63 it mentions, “Economic Development Policy 3.2. Promote increased broadband internet service as a necessary public utility.”</p> <p>I support this wholeheartedly and think that this won’t be achieved until governments challenge large communications firms and their monopoly hold over such public needs. We can have public water districts, surely, we could have broadband internet as an offering. We currently have fiber lines a stone’s throw from where I live but running that last bit of line into our home would cost \$5000 per KPUD. That is beyond what most can afford to pay.</p> <p>-On page 65 the stated goal is, “Economic Development Policy 6.2. Work towards ensuring all socioeconomic demographics have access to housing in Kitsap.”</p> <p>We can never achieve this if the majority of development in the county is high-end homes beyond what most can afford. Stop permitting unaffordable homes and do what it takes to meet the housing needs.</p>
79	2/19/2024	Doug Hayman	Parks Element	Land Use	<p>PARKS, RECREATION AND OPEN SPACES (PROS)</p> <p>-page 115 on accessible open spaces and trails, “This work must also align with regional strategies including Vision 2050 and the Regional Open Space Conservation Plan. These plans aim to protect and enhance a diverse range of public and private open spaces, including urban and rural areas, to provide essential economic, recreational, cultural, aesthetic, and ecological services. These plans emphasize equitable access to open spaces and, to achieve this, propose strategies like integrating open space conservation into planning at all levels, protecting crucial habitats, enhancing urban open spaces, building a regional trail network, and restoring high-value habitat areas.”</p> <p>An essential way to achieve at least part of this goal is to give up on expensive routes through hilly heritage parks. This money would be better spent connecting various locations like Kingston, Hansville, Suquamish and so on with safe, direct trails for all and not just some small group of elite bicycle riders. The so-called “String of Pearls” needs to be seen for what it is/was, a marketing push by Olympic Property Group (now Raydient) to add value to their properties by stringing them together (and not a plan to string the public along). To truly provide wheelchair accessible pathways, it would take a lot more money to do these over hilly terrain than along side existing roadways.</p>
80	2/19/2024	Doug Hayman	Climate Change Element	Environmental	<p>CLIMATE CHANGE</p> <p>-page 155 “Climate Change Policy 11.7. Protect and restore riparian vegetation to improve resilience of streams by reducing erosion, providing shade, regulating temperature, and enhancing other indicators.”</p> <p>Do this by making use of Riparian Management Zones for stream buffers using Site Potential Tree Height guidelines.</p> <p>Also on page 155, “Climate Change Strategy 11.d. Take early action to eliminate or control non-native invasive-species, especially where they threaten native species or ecosystem function.”</p> <p>This should include an emphasis on English ivy removal. It is currently only a class C invasive per one employee with the county. It threatens trees that we’re striving to protect that are so critical to riparian zones, habitat, shading and carbon sequestration.</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
81	2/19/2024	Doug Hayman	Comp Plan	Comp Plan Edits	<p>I submitted comments on the various topics (Housing, Environment, Land Use, etc...).</p> <p>On reviewing the draft comp plan the following didn't fit those so this is an additional submission on the draft from a usability and accessibility perspective:</p> <p>Miscellaneous</p> <p>-On page 20 and elsewhere in these documents are maps that pack too much information on to one page of a PDF. If one zooms the document, then the legend will likely be out of view for any user. And the use of color alone to make distinctions is a violation of federal accessibility standards. There should be something other than color that lets people distinguish one zone from another. The legend issue could be resolved by using GIS software you all use already for the Kitsap Parcel Search. And like that online tool, there could be checkboxes in the legend to turn on/off various views.</p> <p>-On attempting to zoom into the map for Central Kitsap to locate Island Lake, another rezone request that should be denied, one finds that the text becomes blurry and unreadable. Again, this is another failure to meet federal accessibility standards and a failure to provide a usable map to anyone. Higher resolution PDFs that can zoom to 200 or 400 percent and not distort are best, likely with vector graphics.</p> <p>The county’s decision to use yellow highlight on pages 36-onward is yet another failure in meeting federal accessibility standards. Those who use screen reading software would not be notified of such markup. And those of us already highlighting parts of this long document are put in a bind of, “Is that my highlight or someone else’s?” Your stated goal is to later plug in data there and this could be accomplished with “[data to be filled in later]” “[placeholder]” or some such feature that all could benefit from.</p> <p>On page 229 it reads, “Any vision for Suquamish must balance the preservation of the rights of Tribal members and of non-Indian property owners to enjoy the reasonable use of their land.” Is that coded language, "reasonable use of their land"? The Suquamish tribe was cheated out of a much wider area, then provided this small reservation and then people swindled them out of much of the reservation land. So, stop with that language and tell the truth regarding these so-called non-tribal victims being deprived of reasonable use.</p> <p>Doug Hayman</p>
					<p>LAND USE:</p> <p>-Kitsap County needs to ensure that development happens in urban growth areas and does not contribute to sprawl and loss of rural lands, as has been the pattern for Kitsap in the past. We are running out of rural land, which is what makes Kitsap unique, healthy, and beautiful. Our underlying environment is being negatively impacted by loss of habitat, loss of tree canopy, loss of farmland, and impacts into our critical areas.</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
82	2/19/2024	Beth Nichols	Land Use Element	Land Use, Environmental, Raydient Reclassification, Island Lake Reclassification, Housing	<p>Climate change is happening now, and every aspect of this Comprehensive plan should have that awareness woven into it, not just relegating climate change to its own section. Especially important is preserving large areas of tree canopy, diligently protecting water resources, and using UGAs for concentrating services and traffic.</p> <p>Rural rezoning should NOT happen at this time - as we balance land use with affordable housing, we need to protect rural areas and limit the homes built outside of the UGA where homes are more costly to build. Home concentration should be where services and infrastructure are. We do not need more high-income housing developments replacing forests and wildlife habitat, as mentioned in the housing section, we are desperately short of affordable and missing middle housing. Kitsap County should undertake a comprehensive review of rural land use patterns and determine how to move forward with the outcomes it wants especially in regard to missing middle housing and protection of natural resources. Kitsap does not have to be led by the individuals who are seeking rezones for their benefit until there is a clear direction and plan for how to meet the targeted, well planned development needs of the County first.</p> <p>Especially of concern are two rezone requests:</p> <p>-The 400 acres requested by Jon Rose for Raydient ( #72) – this parcel should remain in 1:20 acre zoning to protect the borders of PGFHP , and the surrounding Bond Road corridor as a rural transition. We don’t want one giant corridor of sprawl along Bond Road. It does not make sense to allow denser housing ( 1:5 acres) in that area of current forest land. Deny this rezone. See more information in my other letter specifically about this request. Raydient has no inherent right to receive increased density zoning of the property they have profited from for decades. This rezone would do nothing for the increased missing middle housing needed in the Kingston area, and it duplicates the housing development that will be occurring in Port Gamble town center.</p> <p>-The Island Lake request for rezone of 95 acres near the former Crista Camp should be denied. The heavy impact on the lake environment of such a concentrated development and the local infrastructure is too great to bear. It is the wrong place for high density housing, also in an area of current forest acreage. We need to deny rezones such as this to protect rural lands. It was incredibly short sighted that this property was not purchased earlier to add to Island Lake County Park, it is a needed addition to the protection of the lake and the surrounding critical areas.</p> <p>Kitsap County has the history of moving the UGA boundaries out to accommodate sprawl instead of focusing development in the urban growth areas that already exist, “designating hundreds of acres of doomed forest for future housing”* Now is the time to break that previous unfortunate policy and create a new path of keeping rural areas rural.</p> <p>*<a href="https://www.theurbanist.org/2024/01/29/kitsap-countys-proposed-comp-plan-sleepwalks-toward-more-sprawl/">https://www.theurbanist.org/2024/01/29/kitsap-countys-proposed-comp-plan-sleepwalks-toward-more-sprawl/</a></p> <p>Rezones in any rural areas should not occur without enforceable commitments to housing for local residents below median income level.</p> <p>Another issue of land use is agricultural land and farmland preservation. Kitsap County needs to have an agricultural lands preservation code and this is missing from the Comp Plan; it should be added. Agricultural lands are crucial for climate resiliency, food security, and environmental benefits. We need to support farmers and have policies that encourage local agriculture, increasing our local food resources. Farmland is also protected when rezones are not allowed in rural lands: KEEP RURAL KITSAP RURAL. We need strong supportive farmland preservation language and actions in the 2024 Comp Plan to ensure protection of remaining farm and rural lands.</p>
83	2/19/2024	Beth Nichols	Economic Development Element	Economic Development	<p>Add to and expand on FARMING : Encourage agriculture, urban agriculture, and farming to provide local food security. Implement policies to protect farmland and encourage more farmers to enter into this area of work . Farms are crucial economic providers in our community.</p> <p>MEDICAL: More needs to be said about our urgent medical care crisis in Kitsap County. Use the report from the Kitsap Health District about the crisis of medical care we are experiencing. This area needs greater action and focus! We need many interventions to improve this dangerous situation. Economic investments need to be made in medical care and providing educational opportunities for providers of the future. This area is seriously lacking in the Comp Plan. Partner with KPHD to expand on this area.</p>
					<p>ENVIRONMENT comments</p> <p>We would like to see Kitsap County living up to the goals stated in the Environment element of the Comp Plan. I strongly concur with the statement from the Comp Plan: “Human well-being depends on a healthy, natural environment to provide for clean air, clean water, food, and overall high quality of life.” Now we need to move that from aspirational to ACTION steps. How can we make this happen on the ground?</p> <p>• “Emphasis on the importance of the ecosystem and critical areas throughout the County”- The County needs to upgrade its respect of critical area codes in all development practices as carried out by DCD. Respect for the environment AND respect for those citizens who push for environmental protection needs to be an increased part of DCD’s culture. Currently the bias of DCD staff appears to be toward developers. Citizens have the right to expect balanced services that work to protect the environment equal to the rights of developers. The culture of DCD impacts the ability of Kitsap County to meet this goal of emphasizing the importance of the ecosystem and critical areas. There needs to be a shift in DCD culture.</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
84	2/19/2024	Beth Nichols	Environmental Element	Environmental, Land Use, CAO	<ul style="list-style-type: none"><li>• “Ensuring environmental regulations are consistent with best available science.” Ensure that BAS is treated as expert guidance by DCD staff, and not just aspirational. BAS in environmental codes should be recognized as “expert witness” in public hearings for development permits. Variances to the environmental regulations should be extremely limited.</li><li>• “Recognition of the health benefits of natural systems and aims to reduce adverse environmental impacts on vulnerable populations.” Agree with this statement, and once again – we need action steps for this goal.</li><li>• “Enhancement of urban tree canopy and recognize the benefits of urban forests”</li><li>• – We need strong codes for tree preservation and replacement only when preservation is not at all possible. Tree preservation codes need to be in the UGA, and in Alternative 2. We need to protect trees in the areas of development, in urban areas. Planting new trees in a time of climate change will not adequately replace the trees removed; they will grow too slowly to provide the benefits the larger trees already provide. Some newly planted trees will struggle in our more dry and hot summers. Our tree canopy is a precious resource.</li></ul> <p>-Whenever possible Kitsap County should explore purchase and conservation of sensitive lands to prevent development on critical areas such as wetlands, riparian zones, habitat corridors, forests and around sensitive lake areas. Partnerships with conservation groups should be explored to enable these opportunities to happen quickly. Tax reductions to property owners to incentivize open space and conservation should be explored and offered widely as options in lieu of development. There should be data on “grandfathered in small lots” that contain critical areas and explore how these lots could be protected by conservation efforts or tax incentives.</p> <p>-Net Ecological Gain should be the goal for the County in its approach to critical areas protections. “No Net Loss” is now recognized as SLOW NET LOSS. We are at a crossroads and the time for serious protections of critical areas is now. Net Ecological Gain means that after development, there is an increase in biodiversity, resilience and ecosystem functions. We cannot afford to continue to lose our ecosystem functions especially in this time of accelerating climate change.</p> <p>-Critical area Codes- Riparian buffers need to be the same whether Alternative 2 or 3 is chosen, those buffers need to meet Best Available Science with Riparian Management Zones and Site Potential Tree Height. A Critical area is CRITICAL and has mandated protection whether the County chooses one Alternative or the other. Even in an Urban Growth area, the CAO needs to be followed to meet at least NO NET LOSS, and hopefully NET ECOLOGICAL Gain. We must balance the care of these critical areas with the need for more dense housing.</p> <p>- Water supply and water quality need to be seriously considered with population growth, in this County that relies on aquifers for water. With climate change, adequate water supply and healthful quality is not a given. We need to recognize that we have limits to live within and protect water quality and quantity at all decision points. The care of our water resource is fundamental to all who live here.</p> <p>-On site septics (OSS) are of great environmental concern. When they fail, which they will- they pollute our precious water supply. More education needs to happen for property owners, so they know how to maintain septics and treat them carefully. Development in rural areas, which relies on OSS, should be discouraged as we protect our increasingly limited forested rural areas.</p>
85	2/19/2024	Beth Nichols	Housing Element	Housing, Economy	<p>HOUSING Comp Plan Comments</p> <p>The Comp Plan says about major Housing themes: “-Ensuring sufficient housing stock is available, affordable, and accessible at all income levels and in a variety of housing types - and - Encouragement of multi-family and missing-middle housing, specifically focusing on in existing urban centers”</p> <p>The major question is how to move that from an aspiration to making it happen on the ground. Affordable housing and missing middle housing are needed and Kitsap needs to catch up. What incentives can be used? How will it be measured? How will Kitsap ensure it does something different this time instead of continuing its history of building more high-priced single-family homes in rural areas? Are there best practices to learn from other counties, cities like Bainbridge Island? This Comp Plan needs more specifics and more actions outlined. The plan is too vague and does not go into detail of how the housing targets will be measured and met, as development is happening. Relying on a 5 year look back alone is inadequate.</p> <p>Of great concern is making sure the proposal to allow Accessory dwelling units for increasing housing opportunities actually meets this goal. This could be a good option, but without some kind of controls to prevent conversion to short term rentals, this change will do nothing for housing and only be a boon to the owners of properties.</p> <p>Looking at the Kingston UGA, it appears we have already met population targets with the housing that is in the pipeline, for Arborwood and Seaside. Also there is the town of Port Gamble that will be adding population to the area.</p> <p>I have serious concerns with the level of growth being placed on Kingston as a UGA and these population targets need to be reconsidered in light of the developments already in the pipeline. What is needed now is affordable housing. This should be pursued with focused attention and exploration of how to target that particular type of housing.</p> <p>Height allowances need to be carefully considered to keep Kingston downtown with its special views of the water. Careful design considerations need to be made to keep the downtown core attractive and welcoming.</p>



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Comment #	Date Received	Name	Category	Subcategories	Text
86	2/19/2024	Beth Nichols	Transportation Element	Transportation	<p>Transportation Comments</p> <p>Kitsap County needs bike lanes for community members to travel to school, work and to do errands. These should be direct and efficient on road shoulders and NOT paving parks for mountain bike recreation (such as the proposed STO through North Kitsap Heritage Park, which is not a transportation route ) The preferred route by a majority of the community is to AVOID North Kitsap Heritage park and use a road route that is more efficient for actual travel.</p> <p>I read this excellent comment on the public comment site for the NSTO, and want to echo it for the Comp Plan: “One fundamental need which continues to be unresolved in some areas is safe, non-motorized transportation routes between communities and nearby essential services such as markets, banks, pharmacies and employment/ferries. I looked over the Port Gamble Forest Heritage Park Framework, the Kitsap Non-motorized Facilities Plan, the Transportation Improvement Program, and the North Kitsap String of Pearls Plan. While they all had good suggestions about connecting communities, none of them articulated the idea that non-motorized travelers should have just as much right to safe access to essential services as motorized travelers have — and that providing that safe access is an immediate requirement, not just a nice idea. Furthermore, it seems inexcusable to be spending money on recreation when those fundamental needs have not been met.”</p> <p>Safe sidewalks would make walking more pleasant and viable. As Kingston is now a UGA, thought needs to go into where sidewalks are needed. Walkability in Silverdale UGA should be considered, it would make Silverdale so much more enjoyable and vibrant.</p>
87	2/19/2024	Beth Nichols	Parks Element	Environmental	<p>Parks Comments</p> <p>The current Comp Plan does not make a strong enough stand for the Parks as places of habitat protection and environmental conservation. These values are needed in balance with more active recreation. Community members see our parks as special places to encounter the natural world, and value this type of use as much as active recreation and sports use. As other rural spaces shrink, our parks will play an important role for wildlife habitat – including small creatures such as amphibians as well as larger mammals.</p> <p>Goals and management objectives for heritage parks should include maintaining the parks’ biological communities and ecological functions for future generations. Preserving habitat for native flora and fauna, restoring degraded areas, and avoiding, minimizing, and mitigating impacts from park infrastructure development deserve the highest priority.</p> <p>Please change Parks goals to reflect these values.</p> <p>-If you read the public comment for the NSTO feasibility study, most of the comments are against the plans for an expensive paved shared use path through the park. People value the natural setting, the habitat, and environmental values of the park. The cost of building paved shared use paths through hilly and environmentally sensitive terrain is too high - financially as well as environmentally. The original “String of Pearls” plan* presented to the community years ago in 2011 was for low impact trails, not paved bike roads cutting through the park. * “Across every community and every age bracket, people said their highest priority was walking and hiking trails. The beauty of simple walking trails are that they can be built and maintained by volunteers, have minimal environmental impact and provide people of all ages the opportunity to get outside and enjoy nature.” ( String of Pearls Document, page 1) We should return to this original vision.</p> <p>Port Gamble Forest Heritage Park needs to have a PLAN; the park has not been protected as the resource it is. Redesign the PGFHP master plan framework with priority on nature’s wellbeing and stewardship for current and future generations:</p> <p>- Needs to have wetland and critical areas delineation - Habitat protection plan - Trails need to be planned and not built in an unplanned way, fragmenting the environment.</p>
88	2/19/2024	Beth Nichols	Climate Change Element	Environmental	<p>Climate change needs to be more integrated into every aspect of the plan. Climate change is accelerating, and is not a linear progression. Everything is connected and influences all other aspects of the natural environment.</p>



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Comment #	Date Received	Name	Category	Subcategories	Text
89	2/19/2024	Beth Nichols	Economic Development Element	Economic Development	<p>Add all of these takeaways from this Kitsap County Census of Agriculture: ( attached) Take Aways for promoting and supporting agriculture</p> <ul style="list-style-type: none"><li>• Small, consistent efforts by WSU Kitsap Extension and Kitsap Conservation District in education, business planning, marketing and the economic wellbeing of local farms yielded significant dividends however, additional investments are needed.</li><li>• Demand for local farm products continues to grow as more farms sell to stores, schools, and create value-added products from their farms. Developing a “Buy Local” marketing campaign would further expand consumer demand and increase farm profitability.</li><li>• Farmland preservation and conservation efforts must stem the loss of working landscapes.</li><li>• Support for new and beginning farmers is crucial to the future of farming in Kitsap.</li><li>• Estate and transition planning for aging farmers builds bridges for young farmers seeking land.</li><li>• Decision makers need to recognize and support the contributions of local agriculture to Kitsap’s economy, environmental health and food system resilience.</li></ul> <p><a href="#">See attachment on page 28</a></p>
90	2/19/2024	Beth Nichols	Housing Element	Housing, Economy	<p>I mentioned in an earlier comment that short term rentals need to be regulated so they do not take housing away from the local stock. Bainbridge Island has explored this and it would be worthwhile to see what they have already done- here are their goals in developing a policy. I am attaching their presentation from City Council in 2023. The affordable housing task force on Bainbridge recommended limiting short term rentals due to their impact on local affordable housing.</p> <p>Goals:</p> <ul style="list-style-type: none"><li>• Prevent the loss of rental housing stock</li><li>• Preserve the residential quality of neighborhoods</li><li>• Capture tax revenue</li><li>• Allow economic gain for residents</li><li>• Support tourism in a balanced way</li><li>• Ensure health and safety for guests and residents</li><li>• Prevent competition with traditional lodging establishments</li><li>• Balance the needs and rights of property owners</li><li>• Slow or prevent the proliferation of short term rentals</li></ul> <p>National League of Cities. (2022). Short-Term Rental Regulations: A Guide for Local Governments. <a href="https://www.nlc.org/resource/short-term-rental-regulations-a-guide-for-local-governments/">https://www.nlc.org/resource/short-term-rental-regulations-a-guide-for-local-governments/</a></p> <p><a href="#">See attachment on pages 29-39</a></p>
91	2/20/2024	Doug Hayman	Land Use Element	Raydient Reclassification	<p>The attached is what I received from Futurewise in regards to the rezone request from Raydient for the 400+ acres near Port Gamble Heritage Park.</p> <p><a href="#">See attachment on pages 40-41</a></p>

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92	2/20/2024	Beth Nichols	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Comment to Planning Commission Feb 20, 2024: Land Use regarding Rezone</p> <p>My name is Beth Nichols, I have lived in Indianola since 1986. Over the almost 40 years of living in Kitsap I’ve seen the damaging result of poorly planned growth and suburban sprawl; it has been sad, frustrating and disappointing. I’m hoping that this Comp Plan can be wiser and protect our dwindling but remaining rural lands, forests, and critical areas.</p> <p>I want to call your attention to a specific rezone request in the Comprehensive Plan.</p> <p>The 400 acres requested by Jon Rose for Raydient corporation ( #72). This parcel should remain in 1:20 acre Rural wooded zoning and not be rezoned to Rural residential, 1 to 5 acres. This is the wrong place for more housing density. Raydient can profitably develop or sell the land under its current zoning.</p> <p>If you look at the public comments in the Comprehensive plan, the majority of comments up until February 9th are against the rezone of that property. I encourage you to read those community members’ comments, North Kitsap residents are very concerned about this rezone proposal.</p> <p>There are already more than 1000 new homes coming to North Kitsap, and we do not need another intensive, residential development geared toward high income earners. Quadrupling the number of homes on Raydient’s Bond Road property will draw population away from the designated growth areas, contributing to sprawl the comprehensive plan is designed to avoid. The rezone will do nothing to address the missing middle housing for people already living in Kitsap, which the county is mandated to provide for.</p> <p>Increasing residential density and adding commercial development will have negative impacts on quality of life, traffic and infrastructure, and is incompatible with existing rural and natural land use.</p> <p>Please recommend denying this rezone.</p>
93	2/20/2024	Doug Hayman	Environmental Element	Environmental	<p>Here is a statement I made tonight to the Kitsap Planning Commission in hopes of having Riparian Management Zones be added to the efforts to update the Critical Area Ordinances as they relate to the Comp Plan:</p> <p>Riparian Management Zones (made to Kitsap planning commission meeting Feb 2024)</p> <p>Kitsap County hired a group of experts to report back to them on best available science to then shape their update to the Critical Areas Ordinances to be done this year.</p> <p>In contrast to current stream buffers in the prior CAO, the science calls for a broader perspective on what riparian management zones can do to protect streams, the salmon that rely upon them and other wildlife that use these corridors. These benefits include:</p> <ul style="list-style-type: none"><li>• The recruitment of woody debris that helps shape flow velocities resulting in healthier aquatic habitats.</li><li>• Shade &amp; Microclimate necessary for salmon who need cool waters between 55 and 68 degrees.</li><li>• Bank integrity – these riparian zones stabilize the banks.</li><li>• Runoff filtration – by adhering to minimum suggested 100-foot buffers they remove pollution through filtration, reduction of sediment and keep excess nutrients out as well as toxic metals, herbicides, and pesticides.</li></ul> <p>The suggested guideline of using the Site Potential Tree Height is a wise way to proceed to protect the natural environment we rely upon. We can look to the City of Anacortes as they have embraced this alternative to stream buffers while Clark County to our South has implemented a hybrid of riparian management zones and standard stream buffers.</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
94	2/20/2024	Doug Hayman	Land Use Element	Land Use, Site Specific, Raydient Reclassification	<p>I had initially thought of making these comments tonight to the Kitsap Planning Commission as they were to be briefed on the Comp Plan but instead commented on Riparian Management Zones. These comments are important to Land Use and it would be wise to delay rezoning requests of large developments until after the Comp Plan has been updated.</p> <p>Comment for Planning Commissioners Meeting February 20, 2024 Commissioners, thank you for taking my comment.</p> <p>I have been spending many hours of my time after work reading and then commenting on the draft Comprehensive Plan and related documents like the Draft EIS. Like you all, I do this as unpaid volunteer work as I care about the future of Kitsap County and what legacy we'll pass on to future generations here.</p> <p>There is too much that needs immediate scrutiny regarding the updates to the Comprehensive Plan and the Critical Areas Ordinances to also be able to make well-informed decisions on recent efforts at large developments including Raydient's rezone request of over 400-acres near Port Gamble Heritage Park, development at Island Lake on what was once Crista Camp and finally the development push into wildlife habitat on the former 65-acre Cheney Estate in Enetai.</p> <p>Decisions on these and similar sized projects in the county should be placed on hold until after the Comprehensive Plan has been updated. Then, re-zoning requests would best be made using the most up to date Comprehensive Plan and Critical Areas Ordinances.</p>
95	2/20/2024	Beverly Parsons	Comp Plan	Land Use, Environmental	<p>I'm Beverly Parsons from Hansville. I've been following the research about climate change and watching what is happening in our own county related to increasing temperatures, water supply issues, and sea level rise. It is because of these changes as well as the increasing economic stresses on many people in our county that I want to express my support for Alternative 2 in the Comp Plan—with a critical exception.</p> <p>That is, I urge no rezoning of forested and environmentally sensitive areas on the edges of the current UGAs and cities because it is important to incentivize multifamily housing within the core of the existing UGAs and cities. Multifamily housing needs to be close to where affordable transportation and employment can be concentrated. We need to think in terms of affordable living and affordable community, not just affordable housing.</p> <p>A second reason for no rezoning of these areas on the edges of UGA is because we need to protect our rural areas from sprawl. Sprawl weakens the natural environment that supports us all; our beautiful natural environment is a major reason people move to and visit Kitsap County.</p> <p>As part of supporting Alternative 2, I'd urge that you call for a concentrated look at the rural areas and open spaces of Kitsap County in 2025-26. Make a commitment in the 2024 Comp Plan to such an investigation. Leave rezoning considerations that affect rural changes until after Rural Kitsap and Open space can be looked at as a whole. Such a look needs to be centered on how we encourage farming, agroforestry, heathy protection of critical areas, rural employment, and health for all living things.</p>
96	2/20/2024	Heather Whitlock	Land Use Element	Raydient Reclassification	<p>Thank you for your conscientious efforts to plan and grow Kitsap county. I am writing in opposition to the proposed rezoning of the 400 acres owned by Raydient on Bond Road. When my family moved to Kitsap county over a decade ago, it was because of the rural aspect of the area and the access to the increasingly rare trails and green spaces. Converting that land to higher density housing and commercial space would irrevocably impact our area. Traffic is already congested on Bond Road and we've yet to see the full impact from the Arborwood development currently underway.</p> <p>In reviewing the greater North Kitsap area, it seems like there are locations better suited to density growth without encroaching on the Port Gamble Heritage Park area and tarnishing that rare, natural commodity. And there is already a planned sports complex in Poulsbo, so the idea of duplicating that effort as a potential aspect of the rezone seems unnecessary.</p> <p>While I understand that the property is owned by Raydient and is for them to manage, I do not support the county permitting the rezoning proposal and relinquishing more of our rural areas. We have models like Bainbridge island we can look to as a balance between growth and nature or we can slowly transform Bond Road into another Highway 99.</p> <p>Thank you for your service to the community and for your time reviewing my comments.</p> <p>Heather Whitlock</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
97	2/21/2024	Bill Hilton	CFP	Code	<p>I believe there needs ti be more emphasis on water infrastructure namely the plan it improve fire flow to as much of the county as possible. When I short platted mu property in the early 1990's I had to extend the water line from PUD with a size to accommodate fire flow, now some 40 years later there still isn't fire flow in that area which required me to put in sprinklers at a cost of ~\$28,000 on a \$300,000 house not counting the delays it required. I believe if there was to be an impact fee for water development it would be much of the need funds to upgrade the system to eliminate the expensive requirement of sprinklers.</p>
98	2/21/2024	Janelle Overton	Comp Plan	Economic Development	<p>Hello,</p> <p>I am writing to provide input towards the proposed Comprehensive Plan Update. My concern relates to how an increase in population will impact the community in regards to access to essential businesses such as doctors, vets, auto mechanics, and grocery stores, just to name a few. I have lived in Port Orchard for over 20 years and I have seen a large growth in population without an increase in essential businesses to support the growing community.</p> <p>With our current population It is already very difficult to make appointments with doctors, dentists, and vets (some of which are no longer able to accept new patients).</p> <p>Is there some kind of plan or process that coincides with the proposed Comprehensive Plan that makes it easier for people to obtain/ transfer professional licenses and/ or open businesses in Kitsap County to meet the needs of the targeted population growth?</p> <p>Thank you, Janelle Overton</p>
99	2/21/2024	John Wiilett	Comp Plan	Environmental	<p>Ref; 2024 Kitsap County Comp Plan update</p> <p>Please include this paper and suggestions to forest management ideas in comments to KCCP update</p> <p>John Willett</p> <p><a href="#">See attachment on page 42</a></p>
100	2/21/2024	Rob Salthouse	Land Use Reclass (Site Specific)	Raydient Reclassification, Land Use	<p>The attached letter was sent to Christine Rolfes last year regarding the Comp Plan. We never received and acknowledgement of receipt so we wanted to ensure that our comments were noted.</p> <p>Thanks</p> <p><a href="#">See attachment on pages 43-46</a></p>
					<p>Dear Kitsap County Commissioners,</p> <p>I am writing to express my strong opposition to the Raydient request to rezone their 400 acres on Bond Road and the proposed sports complex, commercial zone, and increased density housing development. This is the wrong place for a sports complex and intense development. I have lived in Kitsap County on Port Gamble Rd since 1993. My husband and I both own small businesses in Poulsbo. We have raised three children in our home. Our kids attended North Kitsap High School, and were all athletes involved in youth "club" sport programs. They are now all college graduates working in their respective fields. We feel blessed to have been able to raise our family in Kitsap County. This is the first time I have reached out to my county commissioners.</p> <p>Here are my concerns:</p> <p>Growth Management Act: This project would create intense development in a rural area adjacent to the Port Gamble Heritage Park- disorganized sprawl that the Growth Management Act was</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
101	2/21/2024	Kristin Zinn	Land Use Reclass (Site Specific)	Raydient Reclassification, Transportation, Housing	<p>designed to avoid. To promote responsible and sustainable growth, this type of dense project should be located in an urban setting with urban amenities. Our Rural areas are part of Kitsap’s beauty and character and need to be protected. Permitting this rezone sets a bad precedent; other developers will want to follow suit and the rural area will be turned into sprawl.</p> <p>Traffic: Traffic infrastructure already cannot handle the existing traffic. There is no sensible plan to deal with the traffic added by the sports complex, commercial zone, and additional homes outside one per 20 acres. There is no public transportation to the proposed sports complex site. Bond Rd is heavily traveled and dangerous. Adding more vehicles and more turning into traffic will only decrease the safety of this road. Major changes to this road will result in increased taxes to all of us.</p> <p>Duplication of new sports centers: This proposed project is 3.8 miles from the proposed Poulsbo Event and Recreation Center (PERC), and planning for that project is already underway. The city of Poulsbo opposes the rezone of the Bond Road property. Beyond duplication building this complex in THIS location does not make sense. I am a former youth sports mom who has traveled to many fields throughout western Washington. Youth teams that rent fields like this in Kitsap are expensive and draw athletes from throughout the county. They tend to rent fields that are centrally located in the county and are easily accessed by the highway. This location is neither. It will not be popular for parents of athletes as there is no quick shopping to allow for an errand during practice. Families will complain to their youth organizations about the location, the traffic and the lack of amenities which will likely lead to teams choosing to rent different fields. These fields need a lot of revenue in order to prevent them becoming a tax burden on residents. This YMCA will also have a negative impact on local gyms and fitness centers, including a new gym in Kingston, "The Yard", that has opened in a long vacant building within the past 5 years. It is extremely difficult for a small business gym to compete with the gigantic non-profit that is the YMCA.</p> <p>Viability of Funding: There is no confirmation that the sports complex can obtain funding for construction and ongoing maintenance, including wastewater discharge and road improvements. Taxpayers could end up with unsustainable tax burdens. We could end up with Raydient’s wish list for housing and commercial development being built, but no way for the community to proceed on the sports complex project due to inability to fully fund the project. Beyond funding for construction there is no plan to cover maintenance. Fields will require maintenance if sports teams are to rent them for practice and competition.</p> <p>Water and Environment: This proposed housing development, sports complex, and commercial zone would be located on a critical aquifer recharge area, near mapped fish bearing streams, and a mapped wetland- putting our local drinking water resources and watershed health at risk. A sports complex including turf fields and large amounts of parking would cause high amount of impervious surface, stormwater discharge and wastewater. For instance, the septic discharge is estimated at 100,000 gallons a day. We, as most people in this area, rely on a well and septic system to live. Putting this system at risk is irresponsible.</p> <p>Wildlife Habitat and Park environment: The rezoning proposal would displace numerous animal populations currently living on this site. The intensity of development would degrade the habitat and outdoor experience of Port Gamble Forest Heritage Park, with neighboring lighting, car trips, and user population. These fields will require lighting in order to be rented during the winter months. This lighting will also impact wildlife and the bird population in the area.</p> <p>Tribal Concerns: Port Gamble S'Klallam Tribe opposes the Rezone on Bond Road. The Suquamish Tribe opposes the rezoning of rural protection or urban restricted parcels to more intensive uses.</p> <p>Affordable Housing Goals: The rezone and sports complex do not help with the target for affordable housing that the County is required to meet by the GMA. The houses will only be for high income earners.</p> <p>I urge you to vote against the Raydient rezone request and the proposed sports complex to keep development within the UGA as required by the GMA, protect areas of North Kitsap’s rural character, discourage suburban sprawl development, minimize additional traffic congestion, and protect our natural environment, water quality and habitat.</p> <p>Sincerely,  Kristin Zinn</p>
					<p>Greetings,</p> <p>I am encouraging you to refuse the proposed re-zone along Bond Rd. proposed by Raydient for the following reasons:</p> <p>The proposed re-zone is in violation of the comprehensive plan.</p> <p>The proposed re-zone is being used to set a precedent for further such deviations from the comprehensive plan.</p> <p>The development of the land per the proposed re-zone would impinge upon a county-designated Critical Aquifer Recharge Area. As global warming changes weather patterns, potentially reducing rainfall, the last thing the county needs is a reduction in useable, drinkable, environmentally-safe water. The proposed development is also estimated to generate 100,000 gallons a day of water-use, and 100,00 gallons of waste-water discharge. Where is the county going to get that 100,000 gallons of water for the proposed development, and how is it going to handle the waste-water generated BY the proposed development. The county has limited water treatment facilities as it is, so it is doubtful that it can add to that by the quantity envisioned. Failure to effectively handle</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
102	2/21/2024	Stephen Howard	Land Use Reclass (Site Specific)	Raydient Reclassification, Transportation, Environmental	<p>the waste-water will inevitably result in legal actions against the county by individual residents whose lands and waters are contaminated, and by the tribes, whose harvesting from the Puget sound waters near the proposed development would be impinged-upon.</p> <p>The proposed re-zone would create the need for major roadway revisions along SR307 (Bond Rd.) that would not only further-impinge upon the aquifer recharge area, but cost both state and county funds needed to maintain the roads that the county already has difficulty maintaining. There is no mass transit service for the proposed site, and Kitsap transit cannot even provide bus service 7 days a week to the Kingston ferry docks.</p> <p>The proposed facilities, the sports complex, are, per Raydient’s own statements, NOT guaranteed to ever materialize, the allotment of land therefor being subject to Raydient’s determination of useability.</p> <p>The only guaranteed beneficiaries of any re-zone would be Raydient, and a handful of developers, financiers, and real-estate agents, which may explain Rotary’s interest in the project. The citizens of the north Kitsap, and the county government, would end up paying the price for this project’s approval and realization. I beg you to not approve this proposal, for the sake of all.</p> <p>Thank you,</p> <p>Stephen Howard</p>
103	2/21/2024	Kathie Lustig	Land Use Reclass (Site Specific)	Environmental, Land Use	<a href="#">See pages 47-56</a>
104	2/21/2024	Denise Gantenbein	Comp Plan	Housing	<p>I am writing this with the understanding that the local housing market is horrible. The cost of homes and interest rates are disenchanting to the American dream.</p> <p>However, that isn’t the reason I email. My main email has to do with the new neighborhoods and housing development across the county but mainly in Port Orchard.</p> <p>The yards are so small that kids can’t play and there are very few cul-de-sac in those neighborhoods to play in. All of these neighborhoods have tiny drive ways and cars parked along the through street -roads. It is not safe for kids to ride bikes or play catch. In addition many of these new developments don’t have playgrounds for the kids to play in either.</p> <p>I understand a lot has changed in 30 years but it has become either one buy a house that is 20+ years old so there is a yard or safe street but then have to pay for costly updates. The other choice is to buy a new home and kids don’t have anywhere to play outside.</p> <p>Please have the developers create places for kids to learn to ride bikes safely and play basketball or have a trampoline and swing set that they can use in the yard.</p> <p>Lastly this is just a side bar - nowadays all the lots and houses are pre planned out. You don’t get to choose. I want a new house in a cul-de-sac with the 5 bedroom house or the 3 bedroom house in this particular style with the biggest lot.</p> <p>Thanks for listening. Please also look at getting a YMCA in Port Orchard. Denise</p>
105	2/22/2024	Ann Schnitzer	Comp Plan	Land Use, Site Specific	<p>Hello Colin,</p> <p>I think there might be an oversight in our LAMIRD III, with the Rural Employment Center zone. Previously, ‘General retail merchandise stores – less than 4,000 s.f.’ were Permitted outright, but on the new proposal, it shows as not allowed. Please correct the current proposal to show they are Permitted.</p> <p>Thank you.</p>
106	2/22/2024	West Sound Cycling Club	Comp Plan	Transportation, Land Use	<a href="#">See pages 57-58</a>
107	2/22/2024	Roger Guy	Comp Plan	Land Use	<a href="#">See page 59</a>

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Comment #	Date Received	Name	Category	Subcategories	Text
108	2/23/2024	Chadrick Ashby	Comp Plan	Site Specific, Land Use, Environmental	<p>I am writing to encourage you to adopt Alternative 2 in South Kitsap, per the County's Comprehensive Plan update. This plan is a reasonable path forward with development and works to preserve some of our more sensitive areas like salmon streams and forests.</p> <p>For example, my family has property in Port Orchard that connects off Brasch and Phillips Roads. This is in the potential UGA expansion Reclassification Request #49 along Phillips Rd. On these properties are Cool Creek, which is a Coho salmon stream. There are also a large amount of sensitive wetlands on the properties which will be negatively affected by increased development.</p> <p>Thank you for your time and consideration on this issue.</p> <p>Chadrick Ashby Here are some pictures of these areas on the properties off Phillips Road that will be directly and negatively impacted by Reclassification Request #49 <a href="#">See attachment on pages 60-62</a></p>
					<p>All Commissioners, Please vote “No Rezone” for Raydient</p> <p>Raydient is attempting to bribe the local North Kitsap Community with the offer of “donated land” for a sports complex and commercial facility in exchange for a rezoning of rural timbered land located along Bond Road and Stottlemyer Rd and abutting Port Gamble Heritage Park (PGHP) to residential. There are currently 20 - twenty acre lots. Raydient Corporation is not a good neighbor; there are many municipalities nationwide suffering from its promises and mishandling of natural resources.</p> <p>I and many others living in North Kitsap oppose any rezone or construction of a sports facility or new neighborhoods along this rural corridor. I would like to encourage the County Commissioners to protect and maintain the property currently owned by Raydient by maintaining its Rural Timbered designation.</p> <p>Raydient is a corporation with one motive; profit for the shareholders. They are willing to sacrifice what is best for the community and future inhabitants for the sake of profit, no matter what their current messaging. Please don’t be short sighted in deciding on this action; maintain the rural areas and focus development within the designated Growth Management Areas.</p> <p>This land, as currently zoned should remain that way for the following reasons: Provide wildlife habitat with connected timbered land and the already protected PGHP; wildlife corridors are critical to healthy maintenance of wildlife populations. Loss of habitat for native wildlife, including amphibians, birds, squirrels, deer, bear, and puma.</p> <p>Provide land available for small farming to help feed Kitsap with locally sourced/organic options. 20 new small farms would have a positive impact on food security in North Kitsap. No added traffic burden to Bond Road which is already at capacity. A sports complex would mean hundreds of new cars on Bond Road negatively impacting horrible traffic from ferries and commuters.</p> <p>No added population burden to North Kitsap schools.</p>



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Comment #	Date Received	Name	Category	Subcategories	Text
109	2/23/2024	Mary Terry	Land Use Reclass (Site Specific)	Raydient Reclassification, Environmental	<p>Maintenance and protection of local streams, Gamble Bay and the natural aquifer; North Kitsap is completely dependent on our fresh water aquifer for drinking water. Run off from parking lots and artificial turf fields or fertilized manicured fields threatens our drinking water.</p> <p>Protect the night sky from light pollution. The current proposal by the Kingston Rotary and YMCA includes lighted fields that would impact wildlife and neighbors of the facility. The city of Poulsbo is working on a project to provide a sports and recreation facility within the city limits, with existing infrastructure. A facility on Bond Road would be redundant. I would like you to consider the many impacts to our community and ecosystem by authorizing a rezoning of the subject land and strongly encourage a unanimous denial.</p> <p>Further, I would encourage the Commissioners to look further than this one location to other similar lands bordering already protected areas like PGHP and ensure that the bordering lands designated as Rural remain Rural and protect them from development. This land is critical to the future generations of Kitsap residents and our wildlife.</p> <p>Many of us live in Kitsap because we love the rural, natural setting and are opposed to further destruction of natural habitat for the sake of growth and profit. We don't want Kitsap to become the next Mill Creek or Issaquah.</p> <p>Thank you for your attention and consideration.</p> <p>Very Respectfully, Mary Terry</p>
					<p>Dear Kitsap County Commissioners,</p> <p>I am writing to express my concerns about the Raydient request to rezone their 400 acres on Bond Road and the proposed sports complex, commercial zone, and increased density housing development. This is the wrong place for a sports complex and intense development.</p> <p>Here are my concerns:</p> <p>Growth Management Act: This project would create intense development in a rural area adjacent to the Port Gamble Heritage Park- disorganized sprawl that the Growth Management Act was designed to avoid. To promote responsible and sustainable growth, this type of dense project should be located in an urban setting with urban amenities. Our Rural areas are part of Kitsap's beauty and character and need to be protected. Permitting this rezone sets a bad precedent; other developers will want to follow suit and the rural area will be turned into sprawl.</p> <p>Traffic: Traffic infrastructure already cannot handle the existing traffic. There is no sensible plan to deal with the traffic added by the sports complex, commercial zone, and additional homes outside one per 20 acres. There is no public transportation to the proposed sports complex site.</p> <p>Duplication of new sports centers: This proposed project is 3.8 miles from the proposed Poulsbo Event and Recreation Center (PERC), and planning for that project is already underway. The city of Poulsbo opposes the rezone of the Bond Road property.</p> <p>Viability of Funding: There is no confirmation that the sports complex can obtain funding for construction and ongoing maintenance, including wastewater discharge and road improvements. Taxpayers could end up with unsustainable tax burdens. We could end up with Raydient's wish list for housing and commercial development being built, but no way for the community to proceed on the sports complex project due to inability to fully fund the project.</p> <p>Water and Environment: This proposed housing development, sports complex, and commercial zone would be located on a critical aquifer recharge area, near mapped fish bearing streams, and a mapped wetland- putting our local drinking water resources and watershed health at risk. A sports complex including turf fields and large amounts of parking would cause high amount of impervious surface, stormwater discharge and wastewater. For instance, the septic discharge is estimated at 100,000 gallons a day.</p> <p>Wildlife Habitat and Park environment: The rezoning proposal would displace numerous</p>

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Comment #	Date Received	Name	Category	Subcategories	
110	2/25/2024	Andrea Lanyi	Land Use Reclass (Site Specific)	Land Use, Raydient Reclassification	<p>animal populations currently living on this site. The intensity of development would degrade the habitat and outdoor experience of Port Gamble Forest Heritage Park, with neighboring lighting, car trips, and user population.</p> <p>Tribal Concerns: Port Gamble S'Klallam Tribe opposes the Rezone on Bond Road.</p> <p>The Suquamish Tribe opposes the rezoning of rural protection or urban restricted parcels to more intensive uses.</p> <p>Affordable Housing Goals: The rezone and sports complex do not help with the target for affordable housing that the County is required to meet by the GMA. The houses will only be for high income earners.</p> <p>I urge you to vote against the Raydient rezone request and the proposed sports complex to keep development within the UGA as required by the GMA, protect areas of North Kitsap's rural character, discourage suburban sprawl development, minimize additional traffic congestion, and protect our natural environment, water quality and habitat.</p> <p>Thank you,</p> <p>Andrea Lanyi</p> <p>Indianola resident</p>
111	2/26/2024	Daria Ilgen and North Kitsap Families	Land Use Reclass (Site Specific)	Raydient Reclassification, Land Use, Transportation, Environmental, Health	<p><a href="#">See pages 63-65</a></p>
112	2/26/2024	Beth Berglund	DDR	Land Use, Housing, Economic Development	<p>It's my understanding that the Kitsap County Planning Commission will be meeting in early March and that the Kitsap County Board of Commissioners will meet in early April to make decisions about changes to the Kingston Subarea Plan. I was a member of the greater Kingston community who participated in the Kingston UVC work group in 2018. The individuals who participated represented UVC property owners/investors, real estate agents, developers, the Port, individuals who had materially participated in prior Kingston subarea plan/comp plan efforts, and At-Large representatives from the KCAC. The effort was sponsored by Kitsap County to identify and remove barriers to infill development in the UVC. We met in person more than 12 times over the course of many months the documents we reviewed and discussed filled a 3 inch ring binder. It was not a small undertaking.</p> <p>Those of us who participated worked very hard to find constructive compromise positions that would position the Kingston UVC for investments / improvements while still respecting the small maritime town and pedestrian centered vision embodied by the Kingston Design Standards. While there were a lot of little changes proposed by the UVC work group, the most significant changes that came out of that effort were the two elements that the Port of Kingston storefront proposal now seeks to reverse.</p> <p>I ask that the Planning Commission and Board of Commissioners please respect the efforts and recommendations of the UVC team which have only been in force for a just a few years (much of which was affected by the COVID pandemic). Please retain the 35/45 foot maximum building height limit and the first floor mixed use flexibility.</p>
113	2/26/2024	Charlie Michel	Transportation Element	Transportation,	<p>Comment to Kitsap County Comp plan- phasing out gas and diesel vehicles</p> <p>We are all in agreement of the need to address the climate change issue. The County should therefore only purchase electric vehicles and no longer purchase gasoline or diesel fueled ones. There is a long-term cost savings benefit, plus it reduces the county's GHG emissions which helps meet their target.</p> <p>Note that there are grants through the Washington State Department of Commerce to install charging stations.</p>
114	2/26/2024	Charlie Michel	Capital Facilities Element	Environmental, Infrastructure	<p>We all agree on the need to reduce GHG emissions. We need to stop "burning stuff". The County should therefore convert all its buildings over to heat pump technology and eliminate the burning of natural gas due to the climate effects. The County should, as much as possible, incentivize new construction in the county to eliminate natural gas appliances and HVAC through incentives, including the speed through the permitting process. This should also save money on utilities.</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
115	2/26/2024	Charlie Michel	Parks Element	Environmental	<p>This comment relates to the importance of addressing climate change.</p> <p>One area sorely underappreciated is the impact of animal agriculture as it relates to the environmental impact. A cow creates 100 times the GHG emissions compared to humans eating plant food for the same calories. “Cut out the “mooodleman”. (mooo goes the cow).</p> <p>Animal agriculture, especially cattle, respirate and fart methane gas which starts out 100 times as heat warming as CO2. Other forms of animal agriculture are also bad, but not as bad as cattle. There is also the pollution effects of animal excrement.</p> <p>Not counted in the FAO’s lobbieist-influenced pie chart of 14% contribution of meat production to GHG is the spill-over effects from the other slices- hauling hay shows up in transportation, building heat under electricity and manufacturing of fertilizer in many places.</p> <p>The good news is when animal agriculture is stopped: GHG trapping of the atmosphere begins to drop as the methane breaks down. Contrast that with power generation where the CO2 is here nearly forever. Reducing animal agriculture is a quick and cheap way to drop GHG’s in our atmosphere.</p> <p>Recommendation: disincentivize animal agriculture in our county. In the Open Space program, no longer accept animal agriculture applications.</p> <p>The attached shows the GHG contributions of various foods.</p> <p><a href="#">See attachment on pages 66-68</a></p>
116	2/26/2024	Port of Kingston Commission	Land Use Reclass (Site Specific)	Raydient Reclassification	<p><a href="#">See page 69</a></p>
117	2/26/2024	Anonymous	CFP	Land Use, Raydient Reclassification	<p>Re. the "Understanding the Different Alternatives" section of the comprehensive draft plan, Alternative 2 is the best choice. Realistically, growth must happen somewhere, so do it IN TOWN, where it makes the most sense. At all costs, the most important thing is to KEEP PORT GAMBLE FOREST INTACT. (Absolutely NO Raydient rezone.)</p>
118	2/26/2024	Sue DeArman	Comp Plan	Environmental	<p>Dear Commissioners,</p> <p>Please keep in mind the environment when updating the comprehensive plan. So often it seems that nature comes in last. With climate change affecting us in so many ways we must take care of our waterways, wetlands, mature trees, and all that depend on them.</p> <p>Thank you,</p> <p>Sue DeArman</p>
					<p>Dear Commissioners Rolfes, Garrido and Walters, and Comp Plan comments:</p> <p>As a homeowner on WA State Highway 104 NE, just east of Port Gamble Forest Heritage Park (PGFHP), I am writing to express my strong objections to the proposed “Raydient Rezone” of 400 acres, located on the east side of the Park. This rezone request is APP ID #72 of the “Reclassification Requests for Consideration in 2024 Comprehensive Plan Alternatives”, applicant Jon Rose. The proposed rezone is to change the current 20 parcels from Rural Wooded (RW- 1 DU/20ac) to Rural Commercial and Rural Residential (RR- 1 DU/5ac).</p> <p>Please consider the following points, which support maintaining the current zoning:</p> <ul style="list-style-type: none"><li>•This property is currently divided into twenty 20-acre parcels, which has been the long-standing intention for this land.</li><li>•More than half of the perimeter of the PGF Heritage Park is currently adjacent to Rural Wooded zoning (63%). If this rezone is allowed, a significant portion of RW in north Kitsap is lost to</li></ul>

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Comment #	Date Received	Name	Category	Subcategories	Text
119	2/27/2024	Maureen Kwolek	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>increased density forever. The RW adjacent to the park currently enhances the value of the park by extending the area used for wildlife, forests and native plants, and groundwater recharge. The adjacent RW zoning also provides a buffer for wildlife and park users from noise, light pollution and traffic.</p> <p>•I'd ask you to study the current zoning map closely (attached). The currently RW zoning of this parcel is part of a few large blocks of Rural Wooded and Park property remaining in north Kitsap. We only have the present to preserve forest areas. The pressure to clear trees and develop land is great, and development should be occurring on property that is already zoned for greater density. Let us preserve what little forest there is remaining.</p> <p>•Any incentive to pass this rezone based on the potential for a community facility (YMCA), is only conjecture. There is no guarantee that a ‘Y’ will be constructed. There have been no feasibility studies or plans for funding a YMCA, and Raydient has stated they will not build nor maintain a YMCA. The cost to build a ‘Y’ at this location may simply be too much, or there may be insufficient demand. As a result, once rezoning occurs, the commercial land could be sold off and built out as any commercial property – minimart, gas station, storage units, etc. As a development company, Raydient’s goal is to rezone and replat property to maximize development potential, and then sell it all off. Raydient rezoned and sold the 700-house Arborwood development, and they no longer have any community interest at all in the land. That project resulted in massive regrading, and loss of topsoil, wildlife, wetlands and forests over a huge area. Their “contribution” to the community was negligible – no parks, no schools, no public trails, no community utilities (other than what is needed to serve 700 houses).</p> <p>•Bond Road traffic is already increasingly congested. Once Arborwood (700 new homes) and the Port Gamble Master Plan (226 new homes) are built out, traffic on the road will become untenable. Is Kitsap County prepared to spend millions of dollars to widen and improve Bond Road? The proposed rezone could result in up to 160 new homes (including an ADU on each of 80 lots).</p> <p>•Raydient has paid next to NOTHING in taxes in the past on these 400 acres, presumable due to exemptions for timber. For example, taxes on just ONE of their existing 20-acres parcels was \$44.72 last year. In contrast I paid \$2,264 last year on a 1-acre undeveloped parcel. Kitsap County government owes nothing to Raydient.</p> <p>Thank you for your consideration.</p> <p>Regards,</p> <p>Maureen Kwolek <a href="#">See attachment on page 70</a></p>
					<p>Kitsap County Commissioners Rolfes, Garrido, Walters, and Eric Baker, Department of Community Development:</p> <p>I suggest that the County adopt Alternative 2 as the basic alternative as you move toward the Preferred Alternative, and wait until after the Comp Plan Update is finished to look at rural land use, zoning, and codes as a whole with attention to ensuring protection of the natural environment. This means putting all requests for changes in the rural zones or LAMIRDs on hold until there is concerted attention to the rural areas following the completion of the Comp Plan Update.</p> <p>I am also writing to express my concerns about the request by Mr. Jon Rose to rezone 400 acres of property owned by Raydient Corporation on Bond Road and the proposed sports complex, commercial zone and increased density housing development I oppose this location for a sports complex and intense development Please do not allow the zoning changes requested by the</p>

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120	2/27/2024	Cathy Ridley	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Raydient of their property on Bond Road near Port Gamble Forest Heritage Park to change from 1 dwelling/20 acres to 1 dwelling/5 acres.</p> <p>Here are my concerns:</p> <p>Growth Management Act: This project would create intense development in a rural area adjacent to the Port Gamble Heritage Park -- resulting in disorganized sprawl that the Growth Management Act was designed to avoid. To promote responsible and sustainable growth, this type of dense project should be located in an urban setting with urban amenities. Our Rural areas are part of Kitsap’s beauty and character and need to be protected. Permitting this rezone sets a bad precedent; other developers will want to follow suit and the rural area will be turned into sprawl. In addition, it would establish precedent for Raydient to request rezoning of their other rural and forest properties for commercial development.</p> <p>Traffic: Traffic infrastructure already cannot handle the existing traffic. There is no sensible plan to deal with the traffic added by the sports complex, commercial zone, and additional homes outside one per 20 acres. There is no public transportation to the proposed sports complex site. The preliminary traffic studies completed for the Sports Complex project indicate that Bond Road currently does not meet service requirements; additional development would exacerbate the already unsafe conditions on Bond Road. In addition, the traffic counts conducted to support Raydient's preliminary studies occurred during the pandemic, a period of severely reduced ferry service in Kingston, meaning the counts were likely much lower than they will be when ferry service is fully restored to reliable operations. WSDOT’s Transportation Improvement Plan does not show any planned improvements to Bond Road in the near future. The County's new public works facility on Bond Road and the Suquamish Clearwater Retail Development, already approved, will also greatly impact traffic beyond what the initial studies take into account.</p> <p>Duplication of new sports centers: This proposed project is 3.8 miles from the proposed Poulsbo Event and Recreation Center (PERC), and planning for that project is already underway. The city of Poulsbo opposes the rezone of the Bond Road property.</p> <p>Viability of Funding: There is no confirmation that the sports complex can obtain funding for construction and ongoing maintenance, including wastewater discharge and road improvements. Taxpayers could end up with unsustainable tax burdens. We could end up with Raydient’s wish list for housing and commercial development being built, but no way for the community to proceed on the sports complex project due to inability to fully fund the project.</p> <p>Water and Environment: This proposed housing development, sports complex, and commercial zone would be located on a critical aquifer recharge area, near mapped fish bearing streams, and a mapped wetland -- putting our local drinking water resources and watershed health at risk. A sports complex including turf fields and large amounts of parking would cause high amount of impervious surface, stormwater discharge, and wastewater. For instance, the septic discharge is estimated at 100,000 gallons a day.</p> <p>Wildlife Habitat and Park environment: The rezoning proposal would displace numerous animal populations, and impact Endangered Species Act-listed wildlife that may be present on this site. The intensity of development would degrade the habitat and outdoor experience of Port Gamble Forest Heritage Park, with neighboring lighting, car trips, and user population.</p> <p>Tribal Concerns: Port Gamble S'Klallam Tribe opposes the Rezone on Bond Road. The Suquamish Tribe opposes the rezoning of rural protection or urban restricted parcels to more intensive uses.</p> <p>Affordable Housing Goals: The rezone and sports complex do not help with the target for affordable housing that the County is required to meet by the GMA. The houses will only be for high income earners.</p> <p>I urge you to vote against the Raydient rezone request and the proposed sports complex to keep development within the UGA as required by the GMA, protect areas of North Kitsap’s rural character, discourage suburban sprawl development, minimize additional traffic congestion, and protect our natural environment, water quality and habitat.</p> <p>Respectfully, Cathy Ridley</p>
					<p>Hello – Our company Quarterra (the multifamily development arm of Lennar Homes) is looking at a site for multifamily development off Greaves Way in Silverdale. As part of the draft 2024 comp plan, we would like to propose changing the following parcels from IND to C zoning:</p> <ul style="list-style-type: none"><li>•172501-1-034-2005</li><li>•172501-1-015-2008</li><li>•172501-1-035-2004</li></ul> <p>Our reasons for proposing this change are:</p> <ol style="list-style-type: none"><li>1. These parcels are impacted by hilly topography that make typical industrial uses inviable, but could accommodate residential or other commercial uses</li><li>2. The parcel to the immediate south is already up for adjustment this cycle from IND to C and changing these parcels too would allow for contiguous commercial zoning along Greaves Way</li><li>3 .Micro location is well positioned to take advantage of walkable retail opportunities and easy highway access better suited for a residential or other commercial use</li></ol>

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121	2/29/2024	Quarterra - Peter van Overbeek	Land Use Reclass (Site Specific)	Site Specific, Land Use, Environmental	<p>Thank you for your consideration and please let us know if there is anything else we can provide or more formal steps we need to take.</p> <p>Best, Peter <a href="#">See attachments on page 71</a></p>
122	3/2/2024	Dianne Iverson	Comp Plan	Transportation	<p>Hi,</p> <p>There is a list of road projects under appendix C. Three alternatives are listed. I'm trying to understand some of the terminology used.</p> <p>For example. Road Project # 260 states there will be a lane adjustment. What does the terminology actually mean? Lane adjustments. It's listed on several of the road projects.</p> <p>Thank you for your time,</p> <p>Dianne Iverson</p>
123	3/2/2024	Beth Davis	Land Use Reclass (Site Specific)	Raydient Reclassification	<a href="#">See pages 72-73</a>
124	3/2/2024	David Onstad	Environmental Element	Environmental, CAO, Land Use	<a href="#">See pages 74-77</a>
125	3/3/2024	Anonymous	Transportation Element	Transportation	<p>I am excited to see your focus is on multi-modal transportation such as high-capacity transit and active transit!</p> <p>I encourage you to consider the feasibility of a light rail system linking major population centers in the county.</p> <p>When considering walk, bike, and roll facilities, I encourage you to first consider installing new multi-use paths that are separated from existing roadways by green space (ideally) or other physical barriers, then consider constructing new multi-use lanes on roads. Please remember that bike lanes and other multi-use paths are effectively useless if they are not part of a connected network. For example, there is a bike lane on Kitsap Mall Blvd NW as it goes over Highway 3. The bike lane only exists for a hundred yards or so then vanishes--what is the point of this bike lane? How does it help anybody? Without being connected to a network of walk, bike, and roll facilities, it is not serving its intended purpose. This is just one example, there are many others.</p>
126	3/3/2024	Thomas Doty	Comp Plan	Environmental, Land Use	<a href="#">See page 78</a>
127	3/4/2024	Futurewise - Tim Trohimovich	Comp Plan	Comp Plan Edits, Housing, Environment	<a href="#">See pages 79-99</a>
128	3/4/2024	John Williams	Comp Plan	Transportation	<a href="#">See pages 100-101</a>
129	3/4/2024	Ryan Wixson	Land Use Reclass (Site Specific)	Site Specific, Land Use, Housing	<p>Hoping this email and the attachment find their way to the right people..</p> <p>Attached is my public comment for the Planning Commission's Public Hearing and the Commisioner's Public Hearing regarding my parents (Dave and Carolyn Wixson) reclassification request for their property at 126 Ne Anna Rd Poulsbo, WA</p> <p>Thank you all for your time and consideration.</p> <p>-- Kind Regards,</p> <p>Ryan Wixson <a href="#">See attachment on pages 102-103</a></p>



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Comment #	Date Received	Name	Category	Subcategories	Text
130	3/4/2024	Eileen Randall	Land Use Reclass (Site Specific)	Raydient Reclassification, Environmental	<p>Dear Commissioners,</p> <p>I am writing to make my voice heard and make it known that I oppose the Raydient Rezone. I stand with the city of Poulsbo and the S’Klallam tribe in this opposition. I believe this Rezoning would violate the Growth Management Act. I further believe it would set a precedent for other developers to rezone.</p> <p>As I am sure you are aware, it is detrimental to our natural environment as well as the health of wildlife.</p> <p>The proposed recreational structure is nearby, the one the city of Poulsbo is already planning on building.</p> <p>I urge you to vote against the Raydient rezone request and the proposed sports complex to keep development within the UGA as required by the GMA, protect areas of North Kitsap’s rural character, discourage suburban sprawl development, and protect our natural environment, water quality and habitat.</p>
131	3/4/2024	Marlena Hubert	Land Use Reclass (Site Specific)	Land Use, Housing	<p>I’m writing in support of reclassification of the property listed below. In the 1980’s the land was designated at 20 acres p/home site and Rural Wooded. Currently, all surrounding property is listed at 5 acres Rural Residential. Our family believes that this property should be listed the same as all surrounding properties and not remain set at the current designation. The land is in a good location between Bremerton and Silverdale for Rural Residential and we believe the current designation is not reflective of the population growth needs of Kitsap County.</p> <p>We would appreciate consideration for a change of designation from Rural Wooded to Rural Residential.</p> <p>Thank you.</p> <p>Sincerely, Marlena Hubert</p>
132	3/4/2024	Brandy Stier	Comp Plan	Land Use	<p>Good morning,</p> <p>My contribution to the plan is to request event space. 10-15 acres, relatively flat and mostly cleared of trees that can be used to host camps and festivals that will provide parking and space. Bonus with potable water. I don't know if the Coulter Creek Heritage site could be modified for mixed use or if there's another location that would work.</p> <p>We keep losing spaces to eventual race tracks...</p>
133	3/5/2024	Christie Schultz	Comp Plan	Environmental, Land Use	<p><a href="#">See pages 104-114</a></p>
					<p>As a homeowner on WA State Highway 104 NE, just east of Port Gamble Forest Heritage Park (PGFHP), I am writing to express my strong objections to the proposed “Raydient Rezone” of 400 acres, located on the east side of the Park. This rezone request is APP ID #72 of the “Reclassification Requests for Consideration in 2024 Comprehensive Plan Alternatives”, applicant Jon Rose. The proposed rezone is to change the current 20 parcels from Rural Wooded (RW- 1 DU/20ac) to Rural Commercial and Rural Residential (RR- 1 DU/5ac).</p> <p>Please consider the following points, which support maintaining the current zoning:</p> <ul style="list-style-type: none"><li>•This property is currently divided into twenty 20-acre parcels, which has been the long-standing intention for this land.</li><li>•More than half of the perimeter of the PGF Heritage Park is currently adjacent to Rural Wooded (RW) zoning (63%). If this rezone is allowed, a significant portion of RW in north Kitsap is lost to increased density forever. The RW adjacent to the park currently enhances the value of the park by extending the area used for wildlife, forests and native plants, and groundwater recharge. The adjacent RW zoning also provides a buffer for wildlife and park users from noise, light pollution and traffic.</li><li>•The currently RW zoning of this parcel is part of a few large blocks of Rural Wooded and Park property remaining in north Kitsap. We only have the present to preserve forest areas. The pressure to clear trees and develop land is intense, and development should be occurring on property that is already zoned for greater density. Let us preserve what little forest there is remaining.</li></ul>



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134	3/5/2024	James Burke	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>•Any incentive to pass this rezone based on the potential for a community facility (YMCA), is only conjecture. There is no guarantee that a ‘Y’ will be constructed. There have been no feasibility studies or plans for funding a YMCA, and Raydient has stated they will not build nor maintain a YMCA. In the future, it may be determined that the cost to build a ‘Y’ at this location is simply too much, funding may be lacking, or there may be insufficient demand to justify it. As a result, once rezoning occurs, the commercial land could be sold off and built out as any commercial property – minimart, gas station, storage units, etc.</p> <p>•Bond Road traffic is already increasingly congested. Once Arborwood (700 new homes) and the Port Gamble Master Plan (226 new homes) are built out, traffic on Bond Road will become untenable. Is Kitsap County prepared to spend millions of dollars to widen and improve Bond Road? The proposed rezone could result in up to 160 new homes (including an ADU on each of 80 lots). The traffic generated by athletic fields will also be significant.</p> <p>•Raydient has paid next to NOTHING in taxes in the past on these 400 acres, presumable due to exemptions for timber. For example, taxes on just ONE of their existing 20-acres parcels was \$44.72 last year. In contrast I paid \$2,264 last year on a 1-acre undeveloped parcel we own. Kitsap County government owes nothing to Raydient.</p> <p>Thank you for your consideration.</p> <p>Regards,</p> <p>James V. Burke</p>
135	3/5/2024	Jessica Osterloh	Comp Plan	Comp Plan Edits	Port Orchard needs a Sub-Area Plan. Every day more apartment units open, more commercial construction projects begin. Where is the long term, 20 year plan ensuring that Port Orchard, like Silverdale, works towards goals of a connected community with a concentrated urban center? Maybe a "Neighborhood Plan" is more appropriate at this stage of growth, but Port Orchard is growing and needs a framework in which to guide that growth to ensure it maintains livability, equitable housing and business opportunities, functional public transit, and enhanced non-motorized transportation options.
136	3/5/2024	Charlie Michel	Comp Plan	Transportation, Environment	<a href="#">See page 115</a>
137	3/5/2024	Rafe Sher	Comp Plan	Transportation, Infrastructure	<p>Hey -</p> <p>The only real comment I have to make is that we need to improve infrastructure - most importantly the roads (and second most importantly electrical).</p> <p>Basically, if a road has more than 200 or so vehicles travelling on it per day, it should not be a 2-lane road (1-way each direction).</p> <p>The roads that fail this that affect me the most are Bethel, Sedgwick, Lund and the 16 highway.</p> <p>Y'all or WSDOT really need to widen these.</p> <p>Thanks,</p> <p>Rafe</p>
138	3/5/2024	Juanita Paulson	Comp Plan	Land Use, Environmental	<a href="#">See page 116</a>

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139	3/5/2024	Doug Hayman	Comp Plan	Housing	<p>Commissioners,</p> <p>I'd be hearing Eric Baker mention this term "Missing Middle Housingl’ and finally looked into it.</p> <p>Turns out it is a term that Daniel Parolek came up with. He more recently wrote a book by that name that I was able to find through the Seattle Public Library as an eBook. (A request has been submitted for Kitsap Regional Library to buy some copies.)</p> <p>I think that it would be a worthy exploration, this Missing Middle Housing to bridge the divide between builders/developers and those wanting to keep development within the Urban Growth Areas.</p> <p>In addition to the book Daniel created this web site:</p> <p><a href="https://missingmiddlehousing.com/">https://missingmiddlehousing.com/</a></p> <p>and what may be of particular use for the Commission in this current Comp Plan, Zoning work is this page:</p> <p><a href="https://missingmiddlehousing.com/about/how-to-enable">https://missingmiddlehousing.com/about/how-to-enable</a></p> <p>There are many examples provided in the book and the web site that could help guide our decision making process as we move forward to meeting diverse housing needs while also maintaining the rural character of other parts of Kitsap County.</p> <p>We don't have to reinvent the wheel on this topic. Instead we can choose from among many good examples already implemented elsewhere.</p> <p>Thanks for taking the time to look into this and may you have the resources you all need to make wise decisions.</p> <p>Doug Hayman</p>
140	3/5/2024	Dave Wixson	Land Use Reclass (Site Specific)	Land Use, Housing	<p><a href="#">See pages 117-119</a></p>
					<p>Below is my testimony for tonight at the Kitsap County Comprehensive Plan.</p> <p>Thank you, Dianne iverson</p> <p><a href="https://mail.google.com/mail/u/0/">https://mail.google.com/mail/u/0/</a> Page 1 of 2</p> <p>I’m Dianne Iverson, a retired educator who resides in Bremerton. Thank you for the opportunity to talk with you about the Kitsap County Comprehensive Plan. I am here today to talk specifically about transportation, an issue all of us can agree is extremely important to the quality of our life.</p> <p>Although I use a wheelchair daily I also bike. My focus today is safe streets for those of us who choose to cycle whether it be for transportation, recreation, or both. We in Kitsap County live on a peninsula that is unsafe for cycling. I want to change that.</p> <p>The past 25 years have produced a multitude of non-motorized policy documents that are good. But policy needs to lead to actual improvements that make it safer for a cyclist to ride, and that has not occurred at the level of safety that other communities throughout Puget</p>

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141	3/5/2024	Dianne Iverson	Comp Plan (PC Hearing)	Transportation, Health	<p>Sound are creating. I believe we can change that with this comprehensive plan.</p> <p>In the opening statements of the Kitsap County Comprehensive Plan it states: Create a contiguous non-motorized transportation system which integrates on and off road facilities. It’s not clear to me how this draft of a comprehensive plan will improve the safety for bikes and pedestrians. I believe with clearer definitions of a bike pedestrian facility and measuring connectivity, that we can take this information and make our roads safer for all users.</p> <p>I’d like to take this time to list road projects in Kitsap County, that I support safety improvements on. When these roads projects are completed, this would allow a cyclist the safety needed to ride from south of Port Orchard, to Bremerton and north to Poulsbo.</p> <p>I support the following list of road projects in Appendix C if they are improved using state definitions for bike and pedestrian safety. I liked to see these road projects be as good as Hansville Road. Hansville Road with its 6 foot shoulders is a step in the right direction to improve safety for bikes and pedestrians. If the 6 foot shoulders were painted with a designated space for bikes and pedestrians, it could be our standard for safety on a north south route from Pierce County to the Hood Canal Bridge. Here’s my recommended list of road projects that should be prioritized. (Bolded road projects not in appendix C or D)</p> <ul style="list-style-type: none"><li>• Bethel-Burley Road # 249, #255</li><li>• Sidney Road. #18</li><li>• Bay Street SR161 (not in appendix C or D) Coordinate with state</li><li>• Jarstad Park to Kitsap Lake Trail (Not in Appendix C or D). Review feasibility study 2017.</li><li>• Kitsap Lake Road NW (not in appendix C or D)</li><li>• Chico Way #95, #233</li><li>• Silverdale Way #225</li><li>• Hansville Road-# 85. You need to mark this road with a painted bike facility just like crosswalks are painted for safety.</li><li>• Viking Way #23, #82</li><li>• Clear Creek Road #214 is an alternative north south route if it had consistently wide and painted shoulders for bikes and pedestrians.</li></ul> <p>As all of us are well aware, climate change is here, now. Defining Kitsap County’s future with a real and safe bike and pedestrian network needs to be part of the overall strategy for combating climate change and making our peninsula more livable. I should not have to drive an hour to Sequim, in order to take my granddaughter on a safe bike ride. Let’s make Kitsap safer for our kids and families.</p>
142	3/5/2024	Kitsap County Non-Motorized Facilities Community Advisory Committee - Laura Westervelt	Comp Plan	Transportation, Comp Plan Edits	<a href="#">See pages 120-121</a>
143	3/5/2024	Paul Dutky	Comp Plan (PC Hearing)	Transportation, Infrastructure	<a href="#">See pages 122-234</a>

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144	3/5/2024	Charles	Comp Plan	Land Use	<p>Hello, to whom it may concern I received your flyer asking regarding our thoughts, comments.</p> <p>My question is, what was your questions, concerns other than planning?!</p> <p>Is Kitsap planning on removing more trees, land and build apartments, houses, or here's a thought homeless are taking over greaves, grocery shopping carts here, there. What is Kitsap doing to stop this.</p> <p>Warm regards, Charles</p>
145	3/5/2024	Dianne Iverson	Comp Plan (PC Hearing)	Housing, Code	<p>I'm Dianne Iverson, retired resident of Bremerton. I am a strong advocate for accessible homes. Accessible single family homes are almost impossible to find here in Kitsap County and everywhere else, I might add.</p> <p>I am a double amputee who uses a wheelchair everyday when I take off my prosthetic legs. I need to live in an accessible home.</p> <p>I moved to Kitsap County in 2008. It took me a year to find a single family home that was accessible. So what is accessible for those of us who use wheelchairs? For me, it's one entrance into the home without stairs, a bedroom on the main floor and a bathroom with 36 inch pocket doors. That's it.</p> <p>In the Kitsap County comp plan we could change this. Build incentives into the building codes that encourage developers to build single family and multifamily homes that are accessible for wheelchairs. It builds community. It builds self-sufficiency for the homeowner. It allows people to visit other peoples homes.</p> <p>I want to live in a community that brings people together and doesn't exclude those with physical disabilities. A big step in the right direction would be changing our building codes to build accessibility.</p> <p>Thank you for the opportunity to share with you my thoughts. Dianne Iverson</p>
146	3/5/2024	Andrew Rudd	Comp Plan (PC Hearing)	Environmental, Transportation	<p>Hello,</p> <p>I am in favor of Alternative 2, although I believe it needs to be improved in a few ways. Retention of mature trees (not replanting after clearing) is crucial and needs to be written into the plan. Forests and wetlands cannot be undervalued in this plan. They need to be protected and preserved, with wildlife corridors to ensure the safe migration of large and small animals alike.</p> <p>We need to commit to and invest in safe bicycle infrastructure to connect our communities throughout Kitsap County. Bicycle fatalities are far too common on our roads, and bike lanes separated by dividers from the road will encourage non-motorized transportation throughout out communities, cutting down on the need for driving cars all the time.</p> <p>Thank you, Andrew Rudd</p>

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147	3/5/2024	April Ryan	Comp Plan (PC Hearing)	Transportation, Infrastructure	<p>I’ve had a relationship with Kingston since the early 1970s when I first passed through on my way to backpack in the Olympics. Since moving to Washington from Colorado, I was drawn back again and again, not merely as a gateway, but to explore the entire peninsula from Tahuya to Hansville. I trekked through its lush forests and sailed along its breathtaking shoreline, looking for a place to call home. Now I live here, close to town, in the UGA, in fact, and I love that I'm close enough to walk or ride a bicycle to shop, meet friends, or take the ferry - except I can't.</p> <p>Because the road between me and the town is treacherous for pedestrians and cyclists, it lacks safe shoulders. Why is this? Why can't this county, even in its UGAs, provide safe non-motorized travel? I'm not talking about specialized recreational trails through parks but the basic need to connect between and within communities. I urge you, the county planners, legislators, developers, and public works, to get serious and follow through on your promises from the LAST Comprehensive Plan. Then, I will trust that you are committed enough to make good on this new Comprehensive Plan.</p> <p>I support Alternative 2 with growth focused in the UGAs, but with important qualifications. The UGAs, especially Kingston, must preserve their most valuable asset - their small-town character. If Kingston mindlessly paves over and fills in every bit of open space with modern high rises, it will have destroyed the charm, the "why" people visit and live here. It won't be easy to balance smart growth while retaining enough open space for a vibrant downtown community, but that is your job. Please look to other successful historic downtowns for models of how to mix retail, residential, cafes, and pocket parks where people pcan gather, not just speed through. Please respect and value our shoreline views, our marina, and our forested lands. And like preserving historic buildings, likewise use discretion in retaining mature trees; their value far outweighs a replanted seedling. With a surplus of buildable land within the UGA, there is no need to scrape lots for building maximization. I'm looking forward to even more beautiful, diverse and thriving communities here in Kitsap - please help make it happen with thoughtful planning and listening to the community.</p> <p>-April Ryan</p>
148	3/5/2024	Chartwell Land Company	Comp Plan (PC Hearing)	Housing, Land Use, Site Specific	<a href="#">See pages 235-237</a>
149	3/5/2024	Carol Michel	Comp Plan (PC Hearing)	Environmental	<a href="#">See page 238</a>
					<p>Kitsap County Planning Board, 3/5/2024</p> <p>“The very act of trying to look ahead to discern possibilities and offer warnings is in itself an act of hope”. Octavia Butler</p> <p>This is what we are trying to do here, look into the future of Kitsap County and make the best actions for current and future generations. In doing so, I request that you listen to the voices of the scientists rather than the developers in the county. The scientists have been studying for years what is happening to our planet.</p> <p>Listen to what they say about tree canopies.</p> <p>Mature tree canopies remove pollution from the air, reduce heating and cooling costs. In fact, the cooling effects of one healthy mature tree is equivalent to 10 room size air conditioners operating 20 hours a day. Mature trees reduce water runoff by absorbing and filtering rainfall while hard surfaces cause large amounts of polluted water washing into rivers, lakes and the sound. Mature tree canopies provide homes for the wildlife we love as well as providing health benefits to all of us. We need to keep our mature tree canopy in the county and planting seedlings is not the same.</p> <p>Listen what they say about clean water</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
150	3/5/2024	Marion Allen	Comp Plan (PC Hearing)	Environmental	<p>Clean water is essential for life, whether human, fish, or bird. Clean water prevents water borne illnesses and is necessary for agriculture. Let’s do all we can to keep the beautiful water we have so that our children don’t have to drink recycled pee. Listen what they say about refuges for our wildlife</p> <p>Wildlife refuges, which don’t exist in Kitsap County are necessary for our deer, bear and other creatures to have habitat and food away from people’s homes. We have over 8,000 acres of park land in this county and we need to set some of it aside for wildlife to thrive without human interruption. We also need a wildlife corridor system for these important creatures to move around the county.</p> <p>And listen to what they say about our rural areas</p> <p>As climate change creates warmer local weather patterns it will be necessary to protect our rural farmlands so we have healthy, local produce and meat on which our county can rely. It is also of utmost importance to our watershed.</p> <p>These things are all necessities for our future lives in Kitsap County and I’m asking that you let your recommendations be led by the knowledge and expertise of science, not developers.</p> <p>Sincerely, Marion Allen, Poulsbo</p>
151	3/5/2024	Christie Schultz	Comp Plan (PC Hearing)	Environmental	<p><a href="#">See pages 239-260</a></p>
					<p>Thank you Amanda for adding the written comment to my verbal public comment tonight .</p> <p>Planning Commission public comment on hearing on Comprehensive plan March 5, 2024 Beth Nichols North Kitsap</p> <p>To the Planning Commission: We are at a crossroads in Kitsap County. Now is the time we must protect our last remaining rural places and critical areas. Development over the last 200 years -and especially in the last 40 years in Kitsap- has produced degraded watersheds and aquifers, declining salmon population, loss of forests and agricultural lands, and vulnerability to climate change impacts-- while encouraging disconnected urban sprawl and housing</p>

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152	3/5/2024	Beth Nichols	Comp Plan (PC Hearing)	Environmental	<p>that does not meet the financial and infrastructure needs of the current population. It is time to build smarter by reducing development of remaining rural lands. Alternative two is the best option for doing this.</p> <p>But we need to add more robust protection of natural resources to Alternative 2 with protection of Tree canopies and Best Available Science stream buffer protections.</p> <p>Kitsap County must take into account input from other agencies and local Tribes, found in the draft EIS comments.</p> <p>Tribal governments: Suquamish, Port Gamble S’Klallam, and Squaxin Island are clear that they do not support increased density zoning in rural areas and DO support more robust stream buffer protections and attention to concerns about water supply and salmon habitat. ( pages 246-287 , 561-562 in addition to earlier comments, 309-311)</p> <p>Washington Dept of Transportation states that traffic impacts on state highways are not fully accounted for in the D EIS and this needs to be addressed. This traffic issue especially impacts the rezone request on State Hiway 307 ( Bond Road) by Raydient corporation. (Pages 563-565. )</p> <p>Futurewise- the statewide group that upholds the Growth Management act, says: “The County’s own data makes clear that the one thing Kitsap County should not do is increase rural development capacity. The Raydient proposal to rezone land from one unit per 20 to one unit per 5 is the opposite of what the Regional Growth strategy requires because it will increase rural population capacity and growth rates. This rezone appears to be inconsistent with VISION 2050. “</p> <p>I would ask that rezoning of any rural parcel not be done, until fully building out current UGA zoned land and incentivizing building in the UGA.</p> <p>There is time for a pause and hold on rural land rezones, so we do not make the same costly mistakes of creating urban sprawl with all of its problems, while not meeting the required targets for affordable housing within areas of infrastructure Beth Nichols</p>
153	3/5/2024	Cedarland	Comp Plan (PC Hearing)	Land Use, Site Specific	<a href="#">See page 261</a>
154	3/5/2024	KEC	Comp Plan (PC Hearing)	Environmental, Land Use	<a href="#">See page 262</a>
155	3/5/2024	Martha Burke	Comp Plan (PC Hearing)	Environmental	<a href="#">See page 263</a>
156	3/5/2024	Pat Walters	Comp Plan (PC Hearing)	Land Use	<a href="#">See pages 264-265</a>
157	3/5/2024	Robin Salthouse	Comp Plan (PC Hearing)	Land Use, Transportation	<a href="#">See pages 266-267</a>



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158	3/5/2024	Scott Hayman	Comp Plan (PC Hearing)	Transportation, Environmental, Raydient Reclassification	<p>Thank you for your service to our county. My wife and I were drawn to Poulsbo and North Kitsap by its beauty, topography, sense of community, friendliness, and proximity to the arts and entertainment located in Seattle.</p> <p>I want Alternative 2 to be implemented with the following added Commitments:</p> <p>Commit to making more of Kitsap County more "walkable" and "bikeable" by making shoulders safe for pedestrians and cyclists, and adding more sidewalks. This will decrease pollution and traffic, and make the area more attractive to tourists. I live in the 128-home Summerset community, which is 1.4 miles from Town &amp; Country Market, 1.9 miles from Safeway, 2 miles from Historic Downtown Poulsbo, and 1.2 miles from Fish Park. While those distances are walkable, I feel that it is dangerous to walk on Viking Way and Highway 305 to reach those sites and drive my car to those locations instead of walking.</p> <p>Commit to creating wildlife corridors that preserve our wildlife and make our roads and highways safer for drivers, many of whom exceed the speed limit and are oblivious to the potential for wildlife to cross the road or highway without warning.</p> <p>Commit to saving mature trees for their beauty, practical attributes, and environmental stability. It is obscene to kill these living things and to consider that seedlings are just as good as established trees.</p> <p>Commit to ensuring that plans consider the ability of transit solutions to support the new comprehensive plan.</p> <p>I am strongly against the rezoning and clearcutting of Raydient's property for the establishment of ballfields and a facility operated by a religious organization, namely the Young Men's Christian Association (YMCA)</p> <p>Thank you for your attention to this message.</p> <p>Scott A. Hayman</p>
					<p>Hello and thank you for the very informative meeting tonight! My name is Shannon Stephens, I live in Kingston and I'd like to re-voice my support for Alternative 2, with a few notes. Several ways we can acknowledge and address the threat of climate change in our region are:</p> <p>- Protect and preserve big, mature trees, both in forestland and in urban centers.</p> <p>- Preserve our wetlands with more than adequate buffers and protections. They sink co2, recharge the groundwater, and create habitat for a myriad of beneficial species.</p> <p>- Promote organic farming of plant-based foods over cattle ranching. Raising beef requires tremendous inputs and contributes greatly to climate change. But sourcing veggies and fruits from local organic farms reduces our footprint dramatically. I'd love to see survival made easier for those farmers.</p> <p>- Create bicycle corridors that link urban centers. Before moving here, I lived in a</p>

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159	3/5/2024	Shannon Stephens	Comp Plan (PC Hearing)	Environmental, Transportation	<p>small town in MI where there were separate bike trails running alongside every major road. So I rode my bike ALL THE TIME. If we had an infrastructure that felt safe (and I don't mean riding on the shoulder-- I mean a lane that is separated physically and visually from motor vehicles), we would see people using bicycles rather than driving cars.</p> <p>- Create wildlife corridors so that the cougars, bobcats and bears we see on our property can move about, hunt, and live their lives without coming into unnecessary contact with homes and lethal roads.</p> <p>We will grow, but we don't "have" to grow exponentially. We can create a daring rule book for development that inspires other counties to imitate us, and preserves our wild, beautiful, unique home (not just Kitsap-- Earth!!).</p> <p>Thank you so much for all that you do.</p> <p>Shannon</p>
160	3/5/2024	Beth Berglund	Comp Plan (PC Hearing)	Land Use, Transportation, Infrastructure	<p><a href="#">See pages 268-273</a></p>
					<p>Hello,</p> <p>I want to first thank all the County staff that have participated in compilation and drafting of the December Comprehensive Plan Draft and its supporting document including the EIS. These documents show significant work and care in addressing the full breadth of land use, infrastructure, natural resources planning and new climate change topics. You are all to be commended for their detail.</p> <p>With this message I would like to convey comments on the EIS (comments sent previously to the County Staff), the Alternative Maps used as a basis for the EIS and the Comp Plan Draft. I have attached my detailed comments for both but also wanted to highlight the few themes I hope the Planning Commissioners and you as County Commissioners will investigate and consider.</p> <p>Here are the few areas that are important to highlight:</p> <p>Additional data and information the County will need before considering a Comprehensive Plan Final:</p> <p>1. City Comp Plans Details - As noted in the EIS, the Cities are also doing their Comp Plan reviews and planning revisions at this time. While it is understandable that the County needed to go forward with the EIS and Comp Plan Draft simultaneously with the Cities, but we all need to know what they are concluding – regarding annexations, additional infrastructure investments, park, and recreation plans, before the County’s final plans can be decided. I hope the County and public can become aware of the results of the Cities analyses soon since they could affect County commitments in the next 20 years and should be folded into the County’s final Plan.</p> <p>2. Road Analysis – The Road LOS and AAVMT analyses in the EIS concluded that there is no current or future significant problem with roadway congestion or function. I believe this conclusion is the result of a course-grained averaging method used to complete the analysis. A more finegrained look at arterial and connector assessments (without averaging in all other roads in the zones considered) is needed to get an accurate assessment of these conditions and to allow the County to face the looming needs for road improvements and to avoid negative effects on commercial and residential development in the next 20 years.</p> <p>Main comment themes regarding the Draft Comprehensive Plan:</p> <p>A. Alterative 2 Mapping and general strategy (compacted growth associated with UGA, LAMRIDS and Cities is the approach to take.</p>

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161	3/5/2024	Betsy Cooper	Comp Plan (PC Hearing)	Transportation, Land Use, Code	<p>B. Kingston Countywide designation is not fully explained and itself would not offer any advantages to Kingston such increasing Kingston’s competitiveness for transportation, transit, and infrastructure funding. Therefore, a revisitation of this designation is necessary and perhaps Kingston should be designated a Regional Center instead.</p> <p>C. Kingston UVC provisions discussed in Alternative 3 (increase in Height to 55 ft; and significantly enlarged Storefront zone; a return to mandatory commercial on the first floor of multistory buildings) are all inappropriate concepts and should not be implemented. Also the proposed upzoning from Rural Wooded to Rural residential of the 200 acre Raident property at Bond/Port Gamble Rd should not be approved.</p> <p>Support for these themes and positions are presented in my detailed comments. I look forward participating in the revisions and finalization of the Comp Plan.</p> <p>Thank you, Betsy Cooper</p>
162	3/5/2024	Bruce McCain	Comp Plan (PC Hearing)	Environmental, Housing, Health	<p>Dear Commissioners:</p> <p>I strongly support Alternative 2 in the Kitsap County Comp Plan. There should be no rezoning of forested and environmentally sensitive areas on the outer edges of the current UGAs and cities.The County needs to encourage multifamily housing within the core of the existing UGAs and cities. Multifamily housing needs to be close to where affordable transportation and employment can be concentrated. The County needs to combine affordable livingand affordable community with affordable housing.Another reason for not rezoning the above-mentioned areas on the edges of UGA is to protect rural areas from urban sprawl. Sprawl weakens the natural environment and diminishes the urban/rural character of the County which includes urban areas as well as rural lands for farming, agroforestry, heathy protection of critical areas, rural employment, and health for all living things.</p> <p>Sincerely, Bruce B. McCain, PhD</p>
					<p>Comment for the KC Planning Commission March 5, 2024 Public Hearing</p> <p>I’m Beverly Parsons from Hansville.</p> <p>I am speaking in support of Alternative 2 of the land use alternatives with the exception of certain proposed zoning changes that are currently in Alternative 2.</p> <p>I urge no re-zoning on the outer edges of the current UGAs and cities that would increase housing density because no rezoning in those areas keeps the attention and resources on increasing density and affordability in the existing UGAs and cities. Past experience shows that rezoning for greater density on the outer edges of current UGAs and cities is likely to result in higher priced housing that is not addressing the affordable housing need of Kitsap. Similarly, I urge no rezoning in rural areas that would increase housing density because no rezoning in rural areas for greater density helps avoid urban sprawl.</p> <p>Also please make a commitment in this Comprehensive Plan Update to a dedicated planning focus on rural Kitsap open space and agriculture in 2025-26 The 2024 Comprehensive Plan</p>

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163	3/5/2024	Beverly Parsons	Comp Plan (PC Hearing)	Land Use, Housing, Environmental, Transportation	<p>Update is focused on increasing density in the UGAs with affordable housing as a central issue. This is very important and deserves the focus that it is being given. Now a commitment is needed to balance this focus with a dedicated look at the rural and open space portions of the county with special attention to climate changes, healthy ecosystems, farming and our food supply.</p> <p>Expansion of the UGAs, increasing rural density, or commercialization within LAMIRD based on the (piecemeal) requests of individual property owners turns a blind eye to the overall consequences for the whole of the ecosystem of the county. Now we must look at rural and undeveloped Kitsap and its importance to all of life to properly make decisions about rezoning requests that are outside of current UGAs.</p> <p>Thank you for attending to these important matters.</p> <p>Beverly</p>
164	3/5/2024	Stacy Marshall	Land Use Element	Land Use, Comp Plan Edits	<a href="#">See pages 274-275</a>
165	3/5/2024	Sean O'Malia	Comp Plan	Transportation, Infrastructure	<p>Hello,</p> <p>Have Kitsap County or Kitsap Transit considered a rail based solution to reducing traffic congestion between Port Orchard and Bremerton? A light rail line between south Kitsap and Bremerton could remove enough cars off of the road on SR16/SR3 through Gorst to allow the existing road capacity to support the corridor’s needs.</p> <p>When discussing high capacity transit (page 101), the comprehensive plan never considers a light rail rapid transit system as an alternative to the Bus Rapid Transit system (page 110). The corridor on SR16/SR3 through Gorst, one of the most congested locations in the county, likely doesn’t have enough real estate to support the implementation of separate infrastructure for a Bus Rapid Transit System without incredible capital expenditure. If a Bus Rapid Transit system does not have reliable separated infrastructure, the buses just get stuck in the same traffic and become no faster than driving. This has been demonstrated in multiple Bus Rapid Transit failures where potential riders opted to go back to their cars because they had a choice between sitting in traffic on a public bus or sitting in their car. In situations where the busses become slower or equivalent to single occupant vehicles, only the people who have no other choice will ride the bus. A separated light rail system has the benefit of being faster and more efficient than a bus going through traffic while also requiring narrower right of ways than a two lane busway system. Additionally, in the tight tolerances of the SR16/SR3 right of way between Bremerton and Gorst, there is already a heavy rail line and the shared use of heavy and light rail lines has precedent elsewhere in the United States.</p> <p>Because a light rail system already exists in the region the equipment and technical knowledge to maintain the system is locally available and less expensive than building a system in a vacuum. WSDOT is actively evaluating what to do with the SR3/SR16 corridor. I think this is the best time to coordinate with them and evaluate the feasibility of installing a system. Sound Transit’s system was incredibly expensive largely because it was built through a dense urban core and about 2 decades later than it should have been, but a system in Kitsap county could be built as it is needed. I understand that this is a large undertaking with some significant unknowns but I think an infrastructure investment like this is a long term investment in the county’s future.</p> <p>Thank you for your time,</p> <p>Sean O'Malia</p>
166	3/5/2024	Walt Elliot	Land Use, Health	See pages	<a href="#">See pages 276-297</a>

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167	3/6/2024	Georgia Chegade	Land Use Reclass (Site Specific)	Raydient Reclassification, Environmental	<p>I know that the rezone along Bond and the YMCA have been pitched as something young families want and need. I do not believe that Bond Road is the right place for this type of development. I understand that the rezone and the YMCA are not necessarily connected. I do not trust the claim made by the Raydient development company that they want to build the YMCA to help our community. I see it as a ploy to convince community members to stand aside and let them rezone this land to make more money off of building more houses. The likelihood of the YMCA ever being built is doubtful in my opinion. Kitsap County stands apart because of its farmland and natural spaces. If we are not careful, developers without regard for the integrity of this community will choose profit and erode what we hold dear. This rezone could set a precedent for other rezones in the future that would go against the Growth Management Act’s efforts to halt urban sprawl. More importantly, if we aren’t careful, we will lose what we all love about living here. Natural spaces and the animals and plants that call them home need a buffer. While the land in question will be developed, the extent to which it is matters! A home per 20 acres will still allow for animals and plants to exist peacefully with their human neighbors. This is especially important considering that the land in question contains wetland buffer zones that are crucial to our dwindling salmon numbers. I grew up in Poulsbo and have lived on Big Valley Rd since 2001. This past summer we were one of over ten families to lose livestock to cougar attacks. Our neighbors on Sawdust Hill Rd have lived there for over 40 years and said they never lost an animal to a cougar in all the time they lived there until this last summer. This is a product of development, leaving our wild neighbors smaller and smaller parcels to hunt on and call home. I acknowledge the importance of places like the YMCA for families in the area. My husband and I both grew up here and participated in soccer, tennis, and swimming programs between the two of us. Luckily we can preserve our natural and rural spaces AND develop recreational centers for the community! The city of Poulsbo is going forward with its plan to build a community and recreational center in an area that has the infrastructure to support it. The traffic along Bond is already problematic. Let’s not make an already challenging situation worse. I want this community to grow and provide spaces for all to gather and play. But please, let’s make smart decisions about how it grows and where we allow development to alter the landscape forever. The Port Gamble Heritage Park is one of my absolute favorite things about living here. Let’s preserve our dwindling rural and natural space because it is the heart of what makes this county so special.</p>
168	3/6/2024	Rodger Seppala	Comp Plan	Transportation, Infrastructure	<p>I am 62. I live in Port Orchard, 1 block outside the city limit. My concern is; as I age I may have to move elsewhere because there are very few sidewalks in Kitsap County. Walking to the pharmacy or grocery store is dangerous.</p> <p>Rodger Seppala</p>
169	3/10/2024	Nancy Kupp	Comp Plan	Infrastructure, Housing, Economy	<p>#1 - they need to restore all of the Bremerton car ferry routes before anyone I know in the Seattle area will move to this part of Kitsap. It would be very hard to have growth without that. #2 - need nice grocery stores in Bremerton / Silverdale area , something like Whole Foods or Central Market. #3 - we can only hope that some good - truly consistent and good restaurants would follow.</p> <p>Thank you for your work on this!</p> <p>Nancy Kupp</p>

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170	3/11/2024	Robin Shoemaker	Comp Plan	Land Use, Infrastructure	<p>Thank you, Colin, for forwarding the most recent update.</p> <p>In lieu of repeating the comments already submitted in the initial comment period, and then comments already added to in the second comment period, I would like to reiterate all off the previously mentioned comments as still requested.</p> <p>The priority request remains the selection of the zoning plan updated to support our property, that was submitted in detail in the first comment period. That revision would bring our property consistent with other adjacent and similar properties, to our own already having the zoning requested. This would also allow connection to sewer in the future.</p> <p>If a zoning revision is not being recommended by the planning commission and BOC, we would ask that at minimum our property be given a waiver in the comprehensive plan to connect to the sewer which exists in West Kingston Road at a future potential date. This would benefit both the adjoining tidal cove as well as our property.</p> <p>It goes without saying that the benefit would also be achieved for the tidal cove as well as our property, with the requested change of zoning.</p> <p>Thank you for again considering my requests and comments.</p> <p>Robin Shoemaker, Homeowner</p>
171	3/11/2024	Charlie Michel	Comp Plan	Environmental, Infrastructure	<p>Eric,</p> <p>I realize there was one deadline for comp plan submissions- the night of the planning commission meeting. I have thought of something in the meantime after seen the article in the Kitsap Sun about building a new gas station at Bond and Gunderson.</p> <p>Several cities in CA have banned new gas station installations. The world is going electric, and we don’t need more gas stations, which are an environmental liability. Is it too late for me to submit this feedback item?</p> <p>Charlie Michel</p>
					<p>Dear Kitsap County Commissioners,</p> <p>I am concerned about Raydient's request to rezone their 400 acres on Bond Road and the proposed sports complex, commercial zone, and increased-density housing development. This is the wrong place for a sports complex and intense development.</p> <p>Here are my concerns:</p> <p>Growth Management Act: This project would create intense development in a rural area adjacent to the Port Gamble Heritage Park. This is the exact type of sprawl that the Growth Management Act was designed to avoid. This dense project should be located in an urban setting with urban amenities to promote responsible and sustainable growth. Our Rural areas are part of Kitsap's beauty and character and must be protected. Permitting this rezone sets a bad precedent; other developers will want to follow suit, and the rural area will be turned into sprawl.</p> <p>Traffic: Traffic infrastructure already needs help to handle the existing traffic. There is no sensible plan to deal with the traffic added by the sports complex, commercial zone, and additional homes outside one per 20 acres. There is no public transportation to the proposed sports complex site. Duplication of new sports centers: This proposed project is 3.8 miles from the proposed Poulsbo Event and Recreation Center (PERC), and planning is already underway. The city of Poulsbo opposes the rezone of the Bond Road property.</p>

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172	3/11/2024	Jenn Hyla	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Viability of Funding: There is no confirmation that the sports complex can obtain funding for construction and ongoing maintenance, including wastewater discharge and road improvements. Taxpayers could end up with unsustainable tax burdens.</p> <p>Water and Environment: This proposed housing development, sports complex, and commercial zone would be located on a critical aquifer recharge area near mapped fish-bearing streams and a mapped wetland- putting our local drinking water resources and watershed health at risk. A sports complex, including turf fields and a large parking lot, would cause impervious surfaces, stormwater discharge, and wastewater. For instance, the septic discharge is estimated at 100,000 gallons a day.</p> <p>Wildlife Habitat and Park Environment: The rezoning proposal would displace numerous animal populations currently living on this site. The intensity of development would degrade the habitat and outdoor experience of Port Gamble Forest Heritage Park, with neighboring lighting, car trips, and user population.</p> <p>Tribal Concerns: The Port Gamble S'Klallam Tribe opposes the Rezoning on Bond Road, and the Suquamish Tribe opposes the rezoning of rural protection or urban restricted parcels to more intensive uses.</p> <p>Affordable Housing Goals: The rezone and sports complex do not help with the affordable housing target that the County is required to meet by the GMA. The houses will only be for high-income earners.</p> <p>I urge you to vote against the Raydient rezone request and the proposed sports complex to keep development within the UGA as required by the GMA, protect areas of North Kitsap's rural character, discourage suburban sprawl development, minimize additional traffic congestion, and preserve our natural environment, water quality, and habitat.</p> <p>Thank you for your time and consideration, Jenn Hyla</p>
173	3/12/2024	Nathan Greene	Land Use Element	Land Use, Infrastructure, Site Specific	<p>The Navy Yard City/National Avenue portion of the UGA listed in the South Kitsap land use chapter needs help. Most of this area has no or poor drainage, no or poor sewer access and many businesses like B&amp;B auto have created drainage issues by brining in fill dirt and gravel and compacting their lots. This leads to 'lakes' near the side of roads in the area.</p> <p>There are no sidewalks surrounding the West Hills Stem Academy and Kitsap Peninsula Vocational Skills Center, endangering students and parents that walk in those areas. S. National and Arsenal is a very dangerous intersection from the east, as there is a blind corner.</p> <p>Either the city of Bremerton needs to annex this area, or the county needs to divert more resources to it. <a href="#">See attachment on page 298</a></p>
					<p>Hi, Colin.</p> <p>Thank you for your February 14, 2024 request to provide preliminary review and suggestions to the county’s draft comprehensive plan and development regulations (Title 17). We appreciate this opportunity to start the conversation early and encourage the county to consider these comments as work continues on development of the comprehensive plan update to ensure consistency with the Growth Management Act (GMA).</p> <p>Housing Element Comments:</p> <ul style="list-style-type: none"><li>• We recommend that all action alternatives presented in the December 2023 Draft Environmental Impact Statement (DEIS) have adequate capacity for housing needs at all income brackets. It appears that Alternative 3 may not have sufficient capacity for housing needs at each income bracket.</li><li>• The GMA requires several steps or considerations to demonstrate how a local government “[m]akes adequate provisions for existing and projected needs of all economic segments of the community” (RCW 36.70A.070(2)(d)). While the county did an excellent job at identifying funding streams used to support affordable housing and has identified and begun to remove barriers to</li></ul>



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174	3/15/2024	Washington State Department of Commerce - Carol Holman	Comp Plan	Housing, Comp Plan Edits	<p>development regulations in Title 17, it is not readily apparent that the draft housing element addresses affordable housing barriers. Specifically, we did not see identification of barriers to meeting affordable housing needs, a list of proposed actions to remove barriers, or consideration of how accessory dwelling units will meet housing needs. We recommend adding discussion of these key points in the final draft comprehensive plan. We have an “adequate provisions” checklist that may support this work, as well as more guidance in Housing Element Book 2.</p> <ul style="list-style-type: none"><li>The draft housing element includes policies to begin undoing racially disparate impacts, exclusion, and displacement. We recommend this material in the housing element be augmented and include a statement of whether data indicates there are disparate impacts in Kitsap County. To further support proposed policies for undoing racially disparate impacts, we also recommend the county include this information in an appendix that reviews, documents, and summarizes the policies and regulations that are attributed to these impacts.</li></ul> <p>Additional Comments/Suggestions:</p> <ul style="list-style-type: none"><li>Urban Growth Areas (UGAs) should not be expanded unless sufficient capacity for housing for all income housing needs cannot be accommodated within the existing UGAs.</li></ul> <p>-Document existing and planned capital facilities and funding sources as they relate to housing capacity.</p> <p>-Housing that supports households making &lt;50% of AMI typically requires densities that are not appropriate outside of UGAs or Limited Areas of More Intense Rural Development (LAMIRDs). These households are often accommodated in multifamily housing which is typically not feasible in rural areas. In addition to the limited density restrictions, permanent supportive housing (PSH) is not appropriate outside of UGAs and LAMIRDs because PSH is a combination of housing and support services, and rural areas generally lack the services needed to support residents.</p> <p>-The increased development intensities that support &lt;50% AMI housing may not be possible in some LAMIRDs that do not have existing infrastructure capacity to accommodate higher density development (RCW 36.70A.070(5)(d)(i)(C)).</p> <p>-Anywhere that higher density development is planned, the comprehensive plan should indicate when sewer and other utilities will be available to serve the development, and the source and timing of funding.</p> <p>Thank you again for the opportunity provide preliminary review and suggestions. Circling back to our January 25, 2024 discussion, we would appreciate receiving a copy of the county’s land capacity analysis (in an Excel file format) or be guided through the steps that are used in the “Land Capacity Calculations by Alternative”. As presented in the PDF version, it is difficult to follow the calculations for each step of analysis.</p> <p>Please feel free to reach out if you have any questions.</p> <p>Best,</p> <p>Carol Holman, MUP</p>
175	3/17/2024	Dominic Giacoppe	Capital Facilities Element	Infrastructure, Comp Plan Edits	<p>WRT Capital Facilities and Utilities Policy 13.1.</p> <p>I strongly agree with this line, but would like if there was a more clearly defined goal. IE, "Run an additional 80 miles of fiber optic cable" or "Provide coverage to 80% of urban areas". The internet is only becoming a larger part of people's lives and expanding community fiber access will help keep our county modern as we move forward.</p>
176	3/17/2024	Kelly Roberts	Comp Plan	Infrastructure, Comp Plan Edits	<p>Hello,</p> <p>As you work on updating codes, please ensure that the exterior lighting standards for BOTH new and existing developments are MORE measurable and enforceable. They need to be measurable in the sense that there should be a maximum number of lumens (800) with a maximum number of Kelvins (2700) and nothing brighter. There needs to be shielding, hooding, and baffling added to the restrictions, as well. The current language is sorely weak in that it only states light illumination should not be more than one foot candle. That is not enough.</p> <p>Thank you.</p> <p>Kelly</p>
177	3/21/2024	Robert Larsen	Transportation Element	Transportation, Infrastructure	<p>Relative to the 2024 Comp Plan and April 8 mtg. I will be out of the area. As an avid cyclist that until recently rode 5K miles a year, I have to say the roads and lack of any shoulder combined with careless, aggressive, speeding drivers The speed limit is a joke. I feel I CAN NOT even ride safely on Seabeck Highway from Anderson Hill Road to the town on Seabeck, I rode extensively in california and i have to say its significantly more dangerous to ride HERE. We need, at an absolute minimum a shoulder for the above mentioned road. I have never been afraid to ride on the road, but i am now. I don't want to become a statistic. Thank You</p>
178	3/22/2024	Kitsap County Association of Realtors (KCAR)	Comp Plan	Housing, Land Use	<p><a href="#">See pages 299-300</a></p>

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Comment #	Date Received	Name	Category	Subcategories	Text
179	3/24/2024	Anonymous	Draft Development Regulations	Code, Land Use	A twenty-foot setback from an alley is far too much for a garage in a medium/high density residential space (17.420.052). Both should be changed to "10. 20 for a garage or carport if that side opens onto a street (21)(29)", with footnote 21 (17.420.060) being changed to say "Twenty feet when abutting a low-density residential zone." This would also apply to certain commercial and LAMIRD zones, and this setback would absolutely be appropriate for these zones as well.
180	3/25/2024	Jackie Kelly	Housing Element	Housing, Health	I'd like to be on record with my concern for the homeless in our County. These wandering souls are lost and need to have help in finding solid ground. I see not a thing on the Comprehensive Plan devoted to a solution to housing the homeless or caring for them so that they can become productive and positive citizens . It is a mistake not to address this now. It is not going to get any better. Some things in society are just not going to go away not because we can't find a solution but rather beause we don't choose to find one. Please find a way to help these unfortunate people.
181	3/25/2024	Jackie Kelly	Environmental Element	Environmental, Land Use	Listening to the presentations and reading through this material there is an issue with the value of mature trees in our environment in relation to climate change and nurturing of the soul. There is no requirement to retain a mature tree buffer around exhistng homes when approving new developments. People purchase their homes because of the environment they personally deem important. To purchase a property surrounded by forest and live in the peacefulness of that environment for years (27 for me) and then have a new development come along that proposes to bulldoze the forest right up to their neighbors property lines is just a travesty. As you decide how to move forward with the Comp Plan please consider your constituents many of who will be trammatically impacted by big developers clear cutting the environment. This is going to change the health of the air, the temperature of the streams and lakes in the areas, the air we breath, the homes for our wild life that we humans are charged to protect. Please find a way to add a reasonable mature tree and natural ground cover buffer around new developments.
182	3/25/2024	Melinda and Paul West	Comp Plan	Raydient Reclassification, Environmental	<p>To Whom This May Concern,</p> <p>My husband, Paul West and I, are concerned about the way that Kitsap County is planning to provide clean water and air for those who live here, while the future population is predicted to grow with need of services, and housing. We are against the Raydient Rezone because that will result in more clearing of existing forests which will further deplete our water recharge areas and the biological services that forests provide cleaning pollutants from the air. We don’t have a river, and the snowpacks are light in the Olympics, so preserving forests throughout Kitsap County should be one of the highest priorities for recharging of our aquifers to provide clean water. Lastly, two of the ugliest examples of comprehensive planning were discussed nationally back in the 1990’s. One, was highway 99 in the Seattle area - the other was Wheaton Way in Bremerton. We remind you of those examples to illustrate what we know will happen to Hwy 307/Bond Road NE/Hwy 104 if your comprehensive plan is to chip away at the few remaining forests that exist. Let’s not rush to be one of the ugliest places in the country by allowing this Raydient Rezone and the domino effect it will have on this corridor. If natural resources in Kitsap County are valued for their biological services, the long term costs to the county and all those who live here and will live here, are exponentially less to preserve now than to attempt to restore later.</p> <p>Thank you for listening.</p> <p>Warmly,</p> <p>Melinda and Paul West</p>
183	3/25/2024	Port Gamble S'Klallam Tribe	Comp Plan, Draft Development Regulations	Land Use, Environmental, Comp Plan Edits	<a href="#">See pages 301-308</a>

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Comment #	Date Received	Name	Category	Subcategories	Text
184	3/25/2024	Walt Elliot	Draft Development Regulations	Housing, Economy	<p>Commissioners</p> <p>I recommend that the Commissioners consider Alternative 3. It best preserves character of our communities while making available housing choices. Community character is seen differently by different segments. Long-term planning should achieve a balance in housing choices. That balance of public preference is seen in surveys such as those by the National Association of Realtors. The rezone applications in Alternative 3 follow future housing needs and economic growth as calculated by professionals willing to invest in them. The Comprehensive Plan should not weigh individual projects. Rather it sets the framework for that growth. The Individual project permit and SEPA process will enable county staff and the affected public to assess individual project details and how impacts are mitigated.</p> <p>I am particularly concerned that the Update preserves opportunity for the housing that many of us currently live in or spent our childhood in. Some space between neighbors; room for a garden; tossing a ball to a dog; children’s play area, (go outside and quit bothering your mom/dad); a garage etc. Think of all the things you and your neighbors do in your yards.</p> <p>Housing affordability needs to be addressed. Limiting low-income families to apartments however does not consider their quality of life. My early childhood was in the Bronx. While it had merit, it wasn’t what young families aspire to. Affordability needs to be addressed by looking at the constraints imposed on housing. Areas with less constraints invariably have more housing choice and lower housing costs.</p> <p>Alternative 3 best serves to preserve the housing opportunities while supporting growth and Kitsap’s economic development.</p> <p>Respectfully</p> <p>Walt Elliott, Kingston</p>
185	3/26/2024	Garrette Custom Homes - Kimberly Johnson	Comp Plan	Land Use, Housing	<p><a href="#">See pages 309-310</a></p>
					<p>Land Use Policy 9.3. Consult with the owners and operators of general aviation airports prior to changing comprehensive plan or development regulations that may affect the use.</p> <p>Land Use Strategy 9.a. Require notice to title for uses within 800 feet of airports, related operations, and avigation (aircraft navigation) easements.</p> <p>Land Use Strategy 9.b. Establish an airport overlay adjacent to the APEX AIRPARK and discuss future limitations on development acknowledging state and federal guidance.</p> <p>I represent the Apex Airpark Association as President and Airport Manager. We are concerned that new growth around Apex Airport is becoming a safety hazard and will result in attempts to close the airport.</p> <p>Apex Airport needs protection from incompatible development within the airport compatibility zones as depicted in the attached satellite photo. There are already several housing developments within these zones, some that would not have received Kitsap County approval if the proper protections were in place. The "notice to title" referred to in 9.a within 800 feet of airports is far too small and needs to be expanded to include property within the outer racetrack (zone 6) in the attachment. WSDOT Aviation Department provides the suggested overlay and guidance for</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
186	3/26/2024	Robert Amburgey	Land Use Element	Land Use, Transportation, Housing	<p>development limitations. Both of these changes (notice to title and the overlay) must be implemented prior to approval of future permits.</p> <p>An airport overlay provides Airport Safety Compatibility Zones which restrict land uses in order to promote the general safety and welfare of properties surrounding the airport. This overlay is an extension of airspace around the airport, typically a racetrack oval shape centered on the runway. Zones are established inside the overlay with varying restrictions based on the proximity of flight operations and concentration of persons. It will require all permit applications within the overlay zone be reviewed for compatibility.</p> <p>As the only airport between Bremerton and Port Townsend, Apex Airport serves vital community needs and is included in Emergency and Disaster Preparedness Plans because the location is ideal. Additionally, it has served as a landing site for St Michael Medical Center, Law enforcement, WA Dept of Fish and Game, San Juan Airways, the Civil Air Patrol and most branches of the military. Recently Bangor Naval Sub Base used the airport to launch drones in an exercise testing their defensive capabilities.</p> <p>Although Apex is a privately owned, it is a public use airport. Any pilot who wants to land here is welcome. These transient aircraft are provided temporary parking space without charge while they are doing business in Silverdale which is 2 miles away. WA State estimates our economic impact at over a million dollars.</p> <p>This overlay is critical to the continued viability of Apex Airport and the critical importance it holds in public service. I urge you to support the inclusion of the Apex overlay in the new comprehensive plan.</p> <p><a href="#">See attachment on page 311</a></p>
187	3/26/2024	Edward Crow	Land Use Element	Land Use, Transportation, Housing	<p>We are concerned that new growth around Apex Airport is becoming a safety hazard and will result in attempts to close the airport.</p> <p>An airport overlay provides Airport Safety Compatibility Zones which restrict land uses in order to promote the general safety and welfare of properties surrounding the airport. This overlay is an extension of airspace around the airport, typically a racetrack oval shape centered on the runway. Zones are established inside the overlay with varying restrictions based on the proximity of flight operations and concentration of persons. It will require all permit applications within the overlay zone be reviewed for compatibility.</p> <p>As the only airport between Bremerton and Port Townsend, Apex Airport serves vital community needs and is included in Emergency and Disaster Preparedness Plans because the location is ideal. Additionally, it has served as an alternate landing site for St Michael Medical Center, Law enforcement, WA Dept of Fish and Game, San Juan Airways, the Civil Air Patrol and most branches of the military. Recently Bangor Naval Sub Base used the airport to launch drones in an exercise testing their defensive capabilities.</p> <p>As a flight instructor and aircraft mechanic at Apex since 1993, I feel that Apex needs to have consideration in county planning.</p> <p>This overlay is critical to the continued viability of Apex Airport and the critical importance it holds in public service.</p>
188	3/27/2024	Andrew White	Land Use Element	Land Use, Transportation, Housing	<p>We are concerned that new growth around Apex Airport is becoming a safety hazard and will result in attempts to close the airport.</p> <p>An airport overlay provides Airport Safety Compatibility Zones which restrict land uses in order to promote the general safety and welfare of properties surrounding the airport. This overlay is an extension of airspace around the airport, typically a racetrack oval shape centered on the runway. Zones are established inside the overlay with varying restrictions based on the proximity of flight operations and concentration of persons. It will require all permit applications within the overlay zone be reviewed for compatibility.</p> <p>As the only airport between Bremerton and Port Townsend, Apex Airport serves vital community needs and is included in Emergency and Disaster Preparedness Plans because the location is ideal. Additionally, it has served as an alternate landing site for St Michael Medical Center, Law enforcement, WA Dept of Fish and Game, San Juan Airways, the Civil Air Patrol and most branches of the military. Recently Bangor Naval Sub Base used the airport to launch drones in an exercise testing their defensive capabilities.</p> <p>This overlay is critical to the continued viability of Apex Airport and the critical importance it holds in public service. I urge you to support the inclusion of the Apex overlay in the new comprehensive plan.</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
189	2/27/2024	Linda Tourigny	Land Use Element	Land Use, Transportation, Housing	<p>I’m concerned about more new growth around Apex Airport. It’s important to consider the Airport Safety Compatibility Zones when any new growth is proposed, as this promotes the safety of any and all properties surrounding the airport. Keeping our community safe, should be a priority. Our airport already does this and is not costing Kitsap County a penny.</p> <p>Apex Airport serves vital needs in our county. It is included in our local emergency and disaster, preparedness plans, as an alternative landing site for Saint Michael Medical Center, local law enforcement, and Washington Department of Fish and Game. San Juan airways, and the Civil Air Patrol and most branches of the military also use our airport.</p> <p>Please support the inclusion of the Apex overlay in the new comprehensive plan, it will save our airport from extinction and greatly benefit our community in the future. Thank you.</p>
190	2/27/2024	Daniel Barry	Land Use Element	Land Use, Transportation, Housing	<p>As one of the owners of Apex Airport I am increasingly concerned about the encroachment on the runway. When the Airport was built over 75 years ago it was out in the country but most recently high density developments have been built directly under our landing pattern with some structures being in violation of FAA guidelines (warehouse built directly off the end of the runway). The Airport provides a valuable asset to the County, with use by military aircraft, life line helicopters and with 6 visitors parking spots we frequently host visitors who are traveling to the Central Kitsap area. I encourage any future development permits, be reviewed by FAA to insure there are no violations of Federal regulations as it pertains to airports. Thank you.</p>
191	2/27/2024	Roger Bailey	Land Use Element	Land Use, Transportation, Housing	<p>As a member of the Apex Airport community and a volunteer staff officer of the Kitsap county Department of Emergency Management I want to echo the value of Apex Airport as an essential part of the Kitsap County service area.</p> <p>The Airport Safety Compatibility Zones are essential to secure and maintain the safety of flight operations, as currently provided for properties within these zones.</p> <p>This airport serves as a reliever for the Bremerton Airport (kpwt) and additionally supports a heliport for emergency medical transport, our Kitsap County sheriffs department, the US Air Force Auxiliary (CAP), and the US Naval Base Bangor security training teams.</p> <p>I thus urge you to continue to support the inclusion of the Apex Overlay in the new comprehensive plan.</p> <p>Respectfully, Dr Roger I. Bailey</p>
192	2/27/2024	Patrece Canoy-Barrett	Land Use Element	Land Use, Transportation, Housing	<p>The area of comment – 9.3, 9.A, 9.B</p> <p>I am concerned that new growth around apex airport is becoming a safety hazard and will result in attempts to close the airport.</p> <p>An airport overlay provides airport safety compatibility zones which restrict land use in order to promote the general safety and welfare of properties surrounding the airport. This overlay is an extension of airspace around the airport, typically a racetrack oval-shaped centered on the runway. The zones are established inside the overlay with varying restrictions based on proximity of flight operations and concentration of persons. It will require all permit applications within the overlay zone to be reviewed for compatibility.</p> <p>As the only airport between Port Townsend and Bremerton, apex airport serves a vital community need and is included in the emergency disaster preparedness plans, because the location is ideal. Additionally, it has served as an alternate landing site for St. Michael's Medical Center, law enforcement, Washington Department of Fish and game, San Juan Airways, civil air patrol and most branches of the military. Recently Bangor naval subbase uses the airport to launch drones in exercise testing defensiveness. Military helicopters frequently practice landings as well.</p> <p>Apex airport has a history for being there since 1946 it is a gift to Kitsap County and that it cost nothing for the county to maintain or operate. So apex does not get any funding from any level of government to be open to the public.</p> <p>Apex has been declared by Washington state DOTAD as a vital part of transportation system.</p> <p>There are RCWs to call out compatible develop about and project public use airports that Kitsap County has ignored.</p> <p>"This overlay is critical to the continued viability of apex airport and critical importance it holds in public service.</p> <p>I urge you to support the inclusion of the Apex overlay in the new comprehensive plan.</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
193	3/27/2024	Patrick Barrett	Land Use Element	Land Use, Transportation, Housing	<p>I am personally concerned that the new growth around apex airport is becoming a safety hazard and will result in attempts to close the airport.</p> <p>And airport overlay provides airport safety compatibility zones which restrict land use in order to promote the general safety and welfare of properties surrounding the airport. this overlay is an extension of airspace around the airport or port, typically a racetrack oval shape, centered on the runway. Zones are thus established inside the overlay with very restrictions space on the proximity of flight operations and concentration of people. This will require all permit applications within the overly zone to be reviewed for compatibility.</p> <p>as the only airport between Bremerton and Port Townsend. Apex has a history of being here since 1946, it cost nothing for the County to maintain and it is open to the public as well. Apex has been declared by the Washington State DOTAD as a vital part of the transportation system. There are RCWs that call for compatible development about and protect public use airports, that Kitsap County has ignored. Apex airport serves a vital community advantage and is included in the emergency disaster preparedness plans because of this location. It has served as an alternate landing site for St. Michael's Medical Center, law enforcement, Washington Department of Fish and game, San Juan Airlines, civil air patrol branches of the military and recently Bangor naval subbase uses the airport to launch drones exercising defense capabilities. Air Force helicopters practice touching goes.</p> <p>"The overlay is critical to the continued viability of the Apex Airpark and the critical importance it holds in public service."</p> <p>I urge you to support the inclusion of apex overlay in the new comprehensive plan.</p>
194	3/27/2024	Beverly Brown Losey	Draft Development Regulations	Land Use, Transportation, Health	<p>Ref 9.3, 9.a, 9.b.</p> <p>Apex Airport is vital in transportation but also for emergencies and disaster planning. Currently, it is used free of charge for emergency helicopter transport in medical emergencies. Also, given the possibility of damage to roads in a disaster, it provides a way to delivery necessary supplies.</p>
195	3/28/2024	Harold Downes	Land Use Element	Land Use, Transportation, Housing	<p>We are concerned that new growth around Apex Airport is becoming a safety hazard and will result in attempts to close the airport.</p> <p>An airport overlay provides Airport Safety Compatibility Zones which restrict land uses in order to promote the general safety and welfare of properties surrounding the airport. This overlay is an extension of airspace around the airport, typically a racetrack oval shape centered on the runway. Zones are established inside the overlay with varying restrictions based on the proximity of flight operations and concentration of persons. It will require all permit applications within the overlay zone be reviewed for compatibility.</p> <p>As the only airport between Bremerton and Port Townsend, Apex Airport serves vital community needs and is included in Emergency and Disaster Preparedness Plans because the location is ideal. Additionally, it has served as an alternate landing site for St Michael Medical Center, Law enforcement, WA Dept of Fish and Game, San Juan Airways, the Civil Air Patrol and most branches of the military. Recently Bangor Naval Sub Base used the airport to launch drones in an exercise testing their defensive capabilities.</p> <p>This overlay is critical to the continued viability of Apex Airport and the critical importance it holds in public service. I urge you to support the inclusion of the Apex overlay in the new comprehensive plan.</p>
196	3/28/2024	Keyport Improvement Club - Karol Stevens	Comp Plan	Housing, Economy, Health, Transportation	<p><a href="#">See pages 312-313</a></p>
197	3/28/2024	John Gotschall	Land Use Element	Transportation, Infrastructure	<p>My comment is to remind all of RCW 36.70.547, existing Washington state law that makes mandatory the requirements regarding land use near "Public Use Airports", regardless of airport ownership structure.</p> <p>Please read RCW 36.70.547 and adhere to the requirements therein.</p> <p>Thanks, JG</p>



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Comment #	Date Received	Name	Category	Subcategories	Text
198	3/28/2024	Skokomish Tribe	Comp Plan	Site Specific, Infrastructure	<a href="#">See pages 314-365</a>
199	3/28/2024	Coleen and Mike Shoudy	Land Use Element	Land Use, Environmental, Site Specific	We agree with the Planners and DCD on recommending Alt 2 for the 2024 Comprehensive Plan. We believe in protection of rural character by directing development to Urban Growth Areas. We live off Central Valley Road and support the need to keep the 95 acre parcel of the old Crista Camp and Coulters farm from being upzoned. The property is on Island Lake and has Barker Creek running through the entire property. It is heavily wooded, and if developed would be clearcut. Tree retention is part of the Climate change addendum added to the critical ordinances that need to be followed. Trees are important for cooling the creek, decreasing air pollution, replenishing aquifers, giving wildlife places to live and citizens places to enjoy nature. We should not continue to allow developers to purchase property then ask for rezones that eliminate the rural feel of our beautiful county. This property does not have adequate road access or urban services available including shopping, bus service, bike lanes, sidewalks and lighting to be zoned Urban Low. Please continue to protect our rural land. Thank you, Coleen and Mike Shoudy
200	3/28/2024	Coleen and Mike Shoudy	Transportation Element	Infrastructure, Transportation, Health	We have lived near Silverdale for decades and am grateful for planning for the future growth with emphasis on climate change and tree retention. Our county is sorely missing safe roads for walking or biking. I commuted for years to the hospital on a bicycle but no longer feel safe. All future planning should include wide shoulders and ideally bike/walking paths. Electric bikes are a great way for people to get around in our hilly county, but it will not happen without infrastructure to support safety. I would like to see more charging stations to encourage electric cars. Tree retention is so important for the climate and mental health of people. Walkable cities, with proper planning, have so many financial and health benefits when residents can get out and walk or bike.
201	3/29/2024	Walt Elliot	Comp Plan	Land Use, Housing	<p>Commissioners</p> <p>In briefing to the Planning Commission County staff identified concerns over the Rayonier Rural Residential Reclassification based on rural characters. The Rural Residential classification would be more constraining than the current “Rural Wooded” classification respect to maintaining current character of the area.</p> <p>The following from the DCD website describes the intent of these classifications:</p> <p>Rural Residential</p> <p>“This zone promotes low-density residential development and agricultural activities consistent with rural character. It is applied to areas relatively unconstrained by environmentally sensitive areas or other significant landscape features. These areas are provided with limited public services.”</p> <p>Rural Wooded</p> <p>“This zone is intended to encourage the preservation of forest uses and agricultural activities, 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 properties in the Radient rezone request (number 72) are currently undeveloped and wooded. The “Rural Residential” classification would constrain development and activities to support that character. By contrast the current “Rural Wooded” classification would promote forestry e.g. clear cutting), This would substantially change the current character of that area.</p> <p>Walt Elliott</p> <p>Kingston WA</p>
202	3/30/2024	Lynn Schorn	Transportation Element	Transportation, Infrastructure, Health	<p>Suggested Bike Corridors linking communities, increasing safety and promoting healthy lifestyles by use of multi-modal transportation: see attached PowerPoint</p> <p><a href="#">See attachment on pages 366-377.</a></p>
203	3/30/2024	Lynn Schorn	Parks Element	Land Use, Health	<p>Please consider the need for sports fields in North Kitsap, partnering with the schools to improve what schools have already and look forward with vision toward possibilities of 200+ acres of Open Space.</p> <p>This could be available with Raydient ReZone, which could offer opportunity for Dog Park, Disc Golf Fishline/Sharenet Community Garden, Pickle Ball courts, Primitive campground and sports fields as well as ADA walking, rolling path.</p>



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204	3/30/2024	Lynn Schorn	Transportation Element	Transportation, Infrastructure, Health	<p>Share the Road signs proposed or 35 mph( consistent) rural speed limits range from 25-45 mph and are not consistent on routes through North Kitsap to link communities.</p> <p>I realize that my " Share the Road" presentation is not a capital improvement project- just a sign project. However it is a North Kitsap improvement idea for safety, multi-modal movement in and around North Kitsap communities and links with the Sound to Olympics(STO). By the Way, the Sound to Olympics Trail is/should be a primary capital improvement project looking toward the future of multi-modal transportation linking the Hood Canal Bridge to the Kingston Ferry and the Hood Canal Bridge to the Bainbridge Ferry via a multi-use trail. Currently, the STO is linking with the Olympic Discovery Trail and the Rails to Trails programs/organizations with a recently acquired \$16.2 million RAISE grant to study routing coordinating with Jefferson and Clallam Counties to create the Puget Sound To Pacific(PS2P).</p> <p>Please don't hesitate to reach out with questions or comments, Thank you, Lynn Schorn</p> <p><a href="#">See attachment on pages 366-377</a></p>
205	3/30/2024	Kelly Roberts	Draft Development Regulations	Infrastructure, Code	<p>Re: Drafted descriptions for exterior lighting standards for 17.105.110 and 17.420.30 C</p> <p>The language does not go far enough, and is not consistent, for both codes. Not only should exterior lighting on existing AND new developments NOT fall beyond one foot candle onto other properties, but there needs to be measurable criteria for the bulbs that will keep the illumination from overreaching and thereby creating light trespass in the first place. No more than 2700 Kelvins of temperature should be allowed - a warm white should be the brightest bulb allowed for use. There are MANY luminaires physically directed downward on both residential and commercial properties, but the emittance from the bulbs is so great that it causes beyond a 45 degree angle of uplight, which is clearly well beyond one foot candle. Also, because neighborhoods are not flat and grid-like in Kitsap county, but instead are hilly and winding, stray light goes almost EVERYWHERE. And because of that, to say that light cannot fall on only "adjoining properties" does not support all owners' rights to peaceful enjoyment and obstruction-free use of property (per RCW 7.48.010) since people's homes are above and below each other, elevation-wise. Both codes for existing AND new development should require downward direction, shielding, and no more than 2700 Kelvins of temperature in order to avoid light pollution. These factors are more realistic, measurable as mentioned, and enforceable. Thank you.</p>
206	3/31/2024	Kitsap County Council for Human Rights (KCCHR) - Kirsten Dahlquist	Comp Plan	Comp Plan Edits, Health, Transportation, Housing	<p><a href="#">See pages 378-380</a></p>
207	3/31/2024	Bobbie Moore	Draft Development Regulations	Health, Land Use, Raydient Reclassification	<p>The Kingston-North Kitsap Rotary club began to advocate for a North Kitsap sports complex about 7 years ago. While the club was also instrumental in funding the Village Green Community Center- where we delivered on a pledge for \$100,000 – we simultaneously identified the sports complex as a critical community need.</p> <p>Since then we have been scouting for an appropriate location. It had to be central to the North end; offer about 40 acres; and of course be property that could readily accommodate environmental rules. As we looked into properties within and near the Kingston UGA we found they were extensively burdened by wetlands.</p> <p>When our members circulated to local land-owners we learned that the Raydient property might be available under terms that would favor not just Kingston but all of the North end communities – Indianola, Suquamish, Hansville, and unincorporated Poulsbo. The central location and proximity to the existing Port Gamble Heritage Park make this property an attractive site for a sports complex that would address significant gaps in North end amenities, notably:</p> <p>1) Neither the County Parks department nor the North Kitsap School District has facilities that accommodate the demand for sports fields – particularly soccer and baseball. You have heard about the parents of youth sports competitors taking their kids to central and south Kitsap for practices and games, packing 4 teams onto fields meant for 2 teams, and elementary-age kids being at practice at 9 PM. The school district needs help just keeping their fields up to basic maintenance standards, not apart from needed upgrades.</p> <p>2) In the meantime, County Parks has made no provision for active recreation in the North end. The emphasis in the Parks department has been exclusively passive recreation – which, while wonderful, and a prized feature of Northwest life, leaves out active recreation, which is critical to our youth mental and physical health.</p> <p>This gap in active recreation amenities has far-reaching effects. It turns out that physical activity and aerobic exercise are essential for the health of both individuals of all ages and the community as a whole. For instance, the World Health Organization model holds that physical activity is critical to muscular strength, cardiovascular health; bone health; cognitive health; mental health; sleep; and body composition. WHO guidelines vary but are equally important to children, adolescents, adults, older adults, and pregnant and postpartum women. The Raydient rezone will make about 40 acres of property that has been tested and found to be free of environmental constraints available for broad public use.</p> <p>Every one of those WHO groups would benefit in every one of the WHO health categories. We are urging Kitsap County Commissioners to prioritize active recreational facilities in the North end by deciding in favor of this sought-after sports complex for the benefit of all of our communities and age groups.</p>

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208	3/31/2024	Anonymous	Land Use Element	Site Specific, Land Use, Housing	<p>I am against the county rezoning the 55 acres that used to be Christa Camp and the adjoining 20 acres (Courter property) to allow 5-9 homes per acre. This amount of homes will not be in keeping with the rural designation along Central Valley of 1 home per 5 acres.</p> <p>A change of this magnitude does not seem to comply with your stated goal of protecting the rural character by directing development to Urban Growth Areas. Also, such a change does not appear to be compatible with adjacent zones which is one of your stated intents of land use goals. If this zoning change and development is permitted, what is to stop the rest of Central Valley being rezoned to allow 5-9 homes per acre?</p>
209	3/31/2024	Anonymous	Environmental Element	Environmental, Land Use, Site Specific	<p>Allowing the Christa Camp and Courter properties to be developed with 5 – 9 homes per acre is not in keeping with your description of Kitsap County as the "natural side of Puget Sound."</p> <p>Construction of so many homes will eliminate the trees which help to keep our air clean, cool Barker Creek, and provide habitat for birds and other animals.</p>
210	3/31/2024	Anonymous	Transportation Element	Site Specific, Transportation	<p>If the maximum of nine homes per acre are built on the Christa Camp and Courter properties, for a total of 675 homes with an average of two cars per residence, the number of vehicles using Central Valley Road will increase tremendously. While your transportation goal is to move people to other modes of transportation, Central Valley Road does not lend itself to pedestrian or bicycle usage. It is already a very busy road only a paved bike lane/walkway on east side of the highway.</p> <p>Also, will the increased traffic require Central Valley Road to be widened? Does the county have the necessary easements to widen the road? If the road were to be widened, would the developer be responsible for the cost?</p>
211	3/31/2024	Anonymous	Capital Facilities Element	Infrastructure, Site Specific	<p>Another concern I have with the development of the Christa Camp and Courter properties with so many more homes being added is water. Will there be enough water? The majority of homes along Central Valley use drilled wells on their property. What if the Island Lake Aquifer runs dry after a few years with this many homes? While those in this new development will receive water from Silverdale Water District and if a deeper well had to be drilled to service them, the cost would be shared among all the district’s users. However, those of us with our own wells would have to spend thousands of dollars to drill deeper wells to get water.</p> <p>Silverdale Water District’s own newsletter reported that Silverdale’s annual precipitation decreased 5 inches from last year’s accumulation. [Between October 1, 2022, and September 30, 2023 (the water year).] With climate change, decreasing rainfall will impact the regeneration of our aquifers.</p>
212	3/31/2024	Anonymous	Climate Change Element	Site Specific, Land Use, Housing	<p>With the scientific community warning about climate change and the need to preserve trees, it seems unwise to allow the destruction of so many trees for this development – Christa Camp and Courter properties. The amount of trees that might be planted by new homeowners would not equal the amount of trees destroyed.</p>
213	4/1/2024	Tarragon - Yeoryia Anastasiou	Land Use Element	Site Specific, Land Use, Housing	<p><a href="#">See pages 381-382</a></p>
214	4/1/2024	Bill Hilton	Comp Plan	Infrastructure, Housing	<p>I think the comp plan should address the deficient capital facilities of fire flow water in at least the semi urban areas of the county.</p> <p>One example would be the Gamblewood area in Kingston. The county is requiring sprinklers for new house but what about the 100 or so that don’t have them. There could be a impact fee for all new remodels for fire flow capital facilities.</p> <p>The logic of new houses be required to have sprinklers when all your neighbors.</p> <p>I just experienced this with my new Manufactured Home that I purchased, the additional cost for sprinkler was \$28,000 and three month delay.</p> <p>I would have much rather spent \$5000 in impact fee.</p> <p>Bill Hilton</p>

Comprehensive Plan Comment Matrix - Comments Received through 4:30 p.m. April 11

Comment #	Date Received	Name	Category	Subcategories	Text
215	4/1/2024	Diane McReynolds	Land Use Element	Environmental, Land Use	<p>Please protect Kitsap's trees. Approved developments should never clear cut the forest. The clearcutting of forest destroys the beauty of Kitsap’s neighborhoods and causes potential damage to surrounding properties.</p> <p>Clearcutting increases the risk of natural disasters such as floods and landslides. Without trees to intercept rainfall, slow down runoff, and stabilize slopes, clearcut areas are more prone to flooding and landslides which will damage property and infrastructure.</p> <ul style="list-style-type: none"><li>· Clearcutting results in the destruction of habitat for animals, birds and fish.</li><li>· We need to protect streams (such as Barker Creek) and prevent any negative effects on ESA fish.</li><li>· Island Lake needs rural areas to recharge Island Lake's aquifer.</li><li>· Trees are needed for air quality and ground stability.</li></ul> <p>All new developments should have a mandatory greenbelt boundary between existing neighborhoods!</p>
216	4/1/2024	Diane McReynolds	Climate Change Element	Environmental, Land Use	<p>Please protect Kitsap's trees. Approved developments should never clear cut the forest. The clearcutting of forest destroys the beauty of Kitsap’s neighborhoods and causes potential damage to surrounding properties.</p> <p>Clearcutting increases the risk of natural disasters such as floods and landslides. Without trees to intercept rainfall, slow down runoff, and stabilize slopes, clearcut areas are more prone to flooding and landslides which will damage property and infrastructure.</p> <ul style="list-style-type: none"><li>· Clearcutting results in the destruction of habitat for animals, birds and fish.</li><li>· We need to protect streams (such as Barker Creek) and prevent any negative effects on ESA fish.</li><li>· Island Lake needs rural areas to recharge Island Lake's aquifer.</li><li>· Trees are needed for air quality and ground stability.</li></ul> <p>All new developments should have a mandatory greenbelt boundary between existing neighborhoods!</p>
217	4/1/2024	Diane McReynolds	Environmental Element	Environmental, Land Use	<p>Island Lake needs rural areas to recharge Island Lake's Aquifer.</p> <p>Barker Creek will become polluted from impermeable surfaces and warming of the creek from loss of the forest canopy if rezoning of forest land is approved..</p>
218	4/1/2024	Diane McReynolds	Capital Facilities Element	Infrastructure	<p>Kitsap County's infrastructure is already strained! Kitsap residents are already highly cognizant of this fact! Adequate roads, sewers, power, water, schools, hospital, EMS/fire department and law enforcement all need to be in place BEFORE any additional developments are approved.</p>
219	4/1/2024	Donna Hart	Capital Facilities Element	Land Use, Housing	<p>I would like to see a Community/Senior Center built in Silverdale in the next 5 years. I'd ideally like to see a temporary solution within a year. Silverdale has long suffered without a center since the old one was torn down almost 20 years ago. A center would be an opportunity for indoor recreational use and community groups to hold meetings, have classes etc. This needs to be a part of the comprehensive plan in the capital facilities section and should be part of the 5 year capital improvement plan.</p> <p>Also, except for one mention in the housing section, seniors aren't included in any of the planning effort. As the largest growing segment of the population, seniors needs should be mentioned in all parts of the plan, housing, transportation, recreation and capital improvements. Please think about including seniors in all of these parts of the plan. The seniors today may not be here in 20 years, but those in their late 40's and in their 50's today, will be the seniors of tomorrow.</p>
220	4/2/2024	Renee Zieman	Land Use Element	Land Use, Environmental, Health	<p>I own a farm business in Poulsbo that helps feed my local community and benefits the local economy. I am dismayed that Kitsap County lost 61% of its farmland between 1997 and 2017. We need to do better in this area</p> <p>in this time of climate change. We need local source of food. Better stewardship and protecting Kitsap farmland that will feed future residents in this era of climate change</p> <p>is needed. Land Use goal 8 mentions adopting initiatives that support urban and rural agriculture but does not go far enough in describing how agricultural land will be identified and protected so that we don't continue to lose farms and farmers.</p>
221	4/2/2024	Renee Zieman	Economic Development Element	Economic, Environmental	<p>Economic Development goal 4 speaks to building a sustainable future as we build the Kitsap economy. It is important to realize that agriculture in Kitsap can do just that. With county support for sustainable farm practices, farms like mine can flourish, offering products for the community and jobs for community members, while still maintaining sustainable working landscapes.</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
222	4/3/2024	Roy Wildes	Comp Plan	Site Specific, Transportation, Infrastructure	<p>I know there is a plan for improving traffic to west of Silverdale in the works. My current concern is the intersection of Newberry Hill Road, El Dorado Blvd, and Dickey Rd. Currently to the north and south of this intersection there are long waits trying to cross or merge onto Newberry. From the west the traffic condition is blind until vehicles are right on top of you. I know there is consideration to place a traffic light or circle at this intersection to help out.</p> <p>My question is the timing of this improvement. Currently in my development, Skyfall there is another 50-ish homes going in as well as a 500 home development being constructed on El Dorado Blvd. Across Newberry is another large development going in at the old gravel pit. This makes a total from the south about a thousand homes that MUST use this intersection or go down the winding Eldorado Hills neighborhood.</p> <p>I understand that every project is a priority and there is only so much funding to go around but can we please evaluate this change of intersection as an elevated priority?</p> <p>Thank you for considering the impact. A rough count is 1685 residences, plus schools and business will use this intersection with only a stop sign.</p>
223	4/3/2024	Paula Wildes	Comp Plan	Site Specific, Transportation, Infrastructure	<p>Also to add to my husband's concern are the school buses that must cross this dangerously busy intersection daily. The CK School District’s bus barn is on Dickey Rd. and CKFR is in close proximity to the intersection as well. Thank you for your time, Paula Wildes</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
224	4/4/2024	Leeward Renewable Energy	Draft Development Regulations	Code, Infrastructure, Environmental	<a href="#">See pages 383-385</a>
225	4/4/2024	Rob Christiansen	Land Use Reclass (Site Specific)	Land Use	<a href="#">See pages 386-389</a>
226	4/4/2024	Ueland Tree Farm - Mark Mauren	Land Use Reclass (Site Specific)	Land Use	<a href="#">See pages 390-391</a>
227	4/4/2024	Joe Crawford	Environmental Element	Land Use, Site Specific	<p>The Kitsap County “Water as a Resource” policy was designed to protect and preserve the few fragile environmental ecosystems we still have. Currently the very survival of Island Lake is now in danger with the potential rezoning of the lake’s southern shores.</p> <p>Enforcing the protection and preservation of critical shoreline boundaries here is more important to this County and its residents than the building of hundreds of new homes in this fragile region. The ramifications of approving any new zoning in this region and the potential negative environmental impact would be an irreversible mistake, one I honestly don’t think is worth the risk.</p> <p>Please protect this critical lake area from any further development so it may always be clean and enjoyable for ourselves and future generations.</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
228	4/5/2024	Craig Smith	Comp Plan	Land Use, Health	<p>I ask you to consider maintaining flexibility to allow the opportunity of multiple athletic fields and more in the north end. I am a longtime resident of Indianola, coaching soccer in North Kitsap since 1977 (NK Soccer Club), instituting soccer at NKHS 1981 and coaching there till 1999. When Kingston HS opened, coached soccer there and continue with my 17th season. Seen a lot of growth in sports with little field development.</p> <p>Many count on NK Schools for fields, maintenance and programing. I’ve seen the field at old Poulsbo Elementary School sold (where I coached the first U-19 Boys NKSC team), my men’s team resurrected the old NKHS field where my dad played and my high school class played, to have a place to play. It sold.</p> <p>The Viking Cup Tournament, one of the largest in the state when it was run by NK Soccer Club was playing games all over NK, Kingston, Poulsbo and Bainbridge. It outgrew itself. There is no large community facility in the county to house such an endeavor. The whole county would benefit.</p> <p>Kingston HS doesn’t have enough fields to fully run a 2A sized school sports functions. Practices are offset to accommodate. There is a need.</p> <p>I am aware of an effort between public and private entities to evolve such a facility right in the center of the north end, that would provide multiple sports, not just soccer. And a swimming pool as the YMCA has expressed interest. I believe a swimming pool is one of the most requested recreational facilities up my way. And it’s been stated the YMCA interest is the location as it reaches a majority of our people and far enough away from their other facility.</p> <p>The land has been offered free in a trade for 60 more homes to be built instead of the 20 now allowed on the approximately 400 acres off Bond Rd and one of the Heritage Parks adjacent. This opportunity may add up to 200 acres more of open space for Heritage Park. And it is close to Kingston, Poulsbo, Suquamish, Indianola, Hansville.</p> <p>It is the best location.</p> <p>I may not live to receive the benefits of this, but it cannot be allowed to pass by as there may not be another opportunity like this to come by. Free land, desperately needed fields, a pool and an organization to help manage it. Imagine the cost to our county if they were to attempt this by themselves.</p> <p>Sincerely,</p> <p>Craig C. Smith</p>
229	4/5/2024	WSDOT - George Mazur	Comp Plan	Transportation, Housing	<a href="#">See pages 392-393</a>
230	4/5/2024	Peter	Environmental Element	Environmental, Site Specific, Island Lake Reclassification	The trees and the land they stand on south of Island lake need to be preserved. If they are allowed to be removed or rezoned from rural to low density, that goes against the preserving of the natural environment in Kitsap County. The mature trees help the ground absorb rain water, protect Barker Creek, Island Lake, and provide refuge for a wide variety of animals and birds.
231	4/5/2024	Futurewise - Tim Trohimovich	Comp Plan	Environmental, Land Use, Housing	<a href="#">See pages 394- 418</a>
232	4/5/2024	Peter	Transportation Element	Transportation, Site Specific, Island Lake Reclassification	The development of the area south of Island Lake will bring increased traffic around the lake. NW Island Lake Rd is an road with no sidewalks. There is no turn lane for the entrance or exit from the parking lot. Lake Shore Dr NW along the east side of Island Lake is an narrow and hilly road. There are no sidewalks and many people when confronted with vehicles expect the vehicles to get out of their way. Delivery vehicles, land scape vehicles, private vehicles, cable as well as phone and other services just stop in front of a residence. This creates a hazard for vehicles wanting to pass. More vehicles will add to the problem.



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Comment #	Date Received	Name	Category	Subcategories	Text
233	4/5/2024	Jess Chandler	Transportation Element	Transportation	<p>Dear DCD and Kitsap County Commissioners,</p> <p>There is so much good effort going into the Kitsap County 2024 Comprehensive Plan. I appreciate all of the efforts to develop policies, across elements that support humans thriving, in concert with wild thriving.</p> <p>Transportation Strategies 4A and 4D are good, but I’m not convinced they are imaginative enough to really get people out of cars and comfortable using bikes, feet, and transit. I think that a safe and equitable non-motorized. or multi-modal, transportation network would prioritize identifying and completing routes N-S, E-W that facilitated the majority of trips between communities.</p> <p>"Transportation Strategy 4.b. Develop a walk, bike, and roll facilities plan and identify the community connections system and how it relates to the County Road Design Standards." This is fantastic. But, I think what we actually need to do is: "Revise and update the existing non-motorized plan to become a more inclusive walk, bike, and roll facilities plan.” Otherwise, the county risks having competing non-motorized plans.</p> <p>I applaud Transportation Goal 7 on public transit and absolutely support expanding this to reach rural areas - the most meaningful way to get many people into commercial areas without relying on cars - think of people in Manchester, Hansville, Seabeck, and all of those rural communities that are separate from commercial areas and drive everywhere. Public transit is a beautiful complement to non-motorized transportation. As a Kitsap Transit rider, I know there is more capacity on the system, too many people stuck in cars.</p> <p>I think the county fails to acknowledge that any capacity building of roadways is in conflict with "Transportation Goal 8. Environmental Protection Avoid first, minimize second, and only then mitigate negative environmental impacts from improvements to the multi-modal transportation system." The first policy under this goal should be to avoid building new capacity.</p> <p>Transportation Goal 9. Funding considers impact fees. This statement/suggestions goes outside of transportation, but hear me out. The impact fees do not currently, even as recently raised, cover the cost of expanding infrastructure to rural development. If impact fees were designed differently, say they are much higher if the development is in conflict with the comprehensive plan, then projects that end up a net maintenance cost to public works would be less attractive to developers. This avoids subsidizing sprawl by ensuring that rural development costs are paid by the users. This would have the added benefit of reducing the need to expand roadway capacity to more rural areas and generally increase density in urban areas - which is better for people on foot or on bike or who breathe, etc.</p> <p>Transformational change requires a change in the way we do business. I do not support "Transportation Strategy 1.f. Utilize the policy-based and data-driven Public Works Transportation Project Evaluation System’s candidate project analysis process to support project selection for the Transportation Improvement Program." The part of this evaluation system that I take contention with is on p.7 where the points for various items are distributed. Vehicular capacity gets a vote on par with safety (18 points of 100) where non-motorized gets 1/3 that (6 points of 100). I think that we want to flip this and non-motorized should have more weight than expanded vehicular capacity. That means that we support a change in the project evaluation system for transportation project selection that is consistent with the county's goals of reducing VMT and expanding multi-modal and non-motorized transportation options. You can read the existing evaluation system for yourself [PW Evaluation System](https://www.kitsapgov.com/pw/Documents/Project%20Evaluation%20System%202017%20PDF.pdf). Please note that the only one that I could find on the County's website was this one from 2017. If the PW department has a newer Transportation Project Evaluation System, my claim may be erroneous. However, the value of capacity on par with safety is not consistent with the county's goals.</p> <p>I support “Transportation Goal 3. Safety Improve safety outcomes from the multi-modal transportation system." However, these policies are inadequate. We should add: Where possible, separate non-motorized users from the roadway through shared use paths, trails, and other creative solutions to minimize the vehicle/pedestrian conflict.</p>
234	4/5/2024	John Center	Land Use Element	Island Lake Reclassification	<p>Under this section the plan says "Protection of rural character by directing development to Urban Growth Areas". Given this focus one cannot comprehend how allowing for additional land to be reclassified to allow for more development around Island Lake makes any sense. There is already a proposed 350 residence project in the final stages of approval on land that is directly adjacent to Island Lake (the Meadowview Project) and now additional zoning is being considered for parcel # 102501-1-016-2004, 102501-4-001-2005 and 102501-4-002-2004. It is hard to comprehend anyone considering development adjacent to or around this small country lake as beneficial to the "Protection of rural character".</p>



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Comment #	Date Received	Name	Category	Subcategories	Text
235	4/5/2024	John Center	Environmental Element	Island Lake Reclassification, Environmental	<p>This section of the the Comp Plan has 5 bullet points that lay out solid factors to focus on in an ongoing effort to protect our natural environment. Each one of them is being violated by the continued granting of high density housing developments (the Meadowview project) and the rezoning request of rural plates (102501-1-016-2004, 102501-4-001-2005 and 102501-4-002-2004) to allow even more on and around the shore of Island Lake. I am not sure how one can consider being a steward of our natural environment and supporting and approving this sort of development in a delicate ecosystem that comprises the Island Lake watershed.</p>
236	4/5/2024	John Center	Parks Element	Island Lake Reclassification	<p>All one has to do is take a walk along the trail in Island Lake park and stop at the swimming beach around late July or early August to take note that there are no children swimming anymore. The reason can be found by taking the time to speak with the county biologist that does the water sampling of all the county lakes. The lake is being overrun by any number of aquatic weeds and is now close to tipping point where it may not be able to be reversed. The water is so polluted by water foul excrement and toxic runoff from surrounding development that parents do not allow their children to use the beach. How can allowing further high density housing development (the Meadowview Project, and the rezoning of parcels: 102501-1-016-2004, 102501-4-001-2005 and102501-4-002-2004) on and around the lake be in any way beneficial to the healthy future of the water quality of the lake.</p>
237	4/6/2024	John Willett	Land Use Element	Land Use, Environmental	<p>Forest Restoration Tool Box Ideas By: John Willett 12/2023</p> <p>Forest Restoration in Kitsap County Comp Plan for 2024</p> <p>1. Small Wetlands, under 1 acre Wetland in Clear Cut Regulations should be updated to current science so as to protect "linked" (small wetlands in any logging operation) Wetlands through surface or subsurface drainage and /or habitat vegetation. This should match up with current building code regulations for wetlands in Kitsap County.</p> <p>2. Legacy Trees in all Clear Cuts should be retained for habitat and reforestation.</p> <p>a. Some Legacy trees could be cut if 50% of acreages are Legacy trees, leaving 50% of acreage as Legacy trees .</p> <p>b. No stand should contain less than 50% Legacy Trees after Restorative Thinning.</p> <p>c. Property taxes should decrease in a sliding scale as to percentage of Legacy Trees on Property.</p> <p>3. Tree Farm taxes increase from current taxation rate for managed property that does not retain 50% of its forest upon logging per percentage of retained forest acreage in standing trees, de-incentivizing Clear Cut Logging, except in diseased forests.</p> <p>4. Tax incentives for Tree Farms that selective log and are certified sustainable by DNR. Property taxes decrease in a sliding scale as to how many trees are left standing after logging operation.</p> <p>5. Incentives for Commercial Hemp Production. 70% of all paper was produced from Hemp until 1930s. That paper production is mostly from trees now. Incentives for Hemp production would decrease to need to clear cut forests and incentify forest restoration and sustainably thinned/logged forests.</p>
238	4/6/2024	Carol Michel	Comp Plan	Transportation, Infrastructure	<p>Public Testimony on 2024 Kitsap County Comp Plan, Hansville Rd</p> <p>My name is Carol Michel. I have lived in Kitsap County for 26 years. I am an avid cyclist and over the years have ridden my bike throughout Kitsap County. We are fortunate to have so many beautiful places to ride. One of my favorites is Hansville Road in the north part of the county. Fortunately, this road does have decent shoulders most of the way to Hansville. They are mostly 5-7 foot in width with a few places that are slightly narrowed due to guardrails etc. Unfortunately, the last mile or so on either side is more challenging as the shoulders become much narrower and therefore more dangerous.</p> <p>The comp plan recommendation for this road includes 6 miles of shared use path with left turn lanes and access control at a cost of \$6 Million dollars.</p> <p>Rather than the six miles of shared use path, it would make more sense to just continue the wide 5-7 foot shoulders on either side of the road at considerably less expense. I’m not convinced there is enough bike/pedestrian traffic to justify a \$6Million dollar shared use path. I would prefer that money be used to increase connectivity in higher priority areas of the county.</p> <p>Additionally, it would be even safer if we could add a Flex Space designation as was done near Harper on Southworth Drive. This indicates a space to be shared exclusively by bikes and pedestrians. Flex Space demarcation can be achieved with clear signage and MMA Red Transit paint as shown in the attached photo of Southworth Drive.</p> <p><a href="#">See attachment on page 419</a></p>

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Comment #	Date Received	Name	Category	Subcategories	Text
239	4/6/2024	Charlie Michel	Comp Plan	Transportation, Infrastructure	<p>My name is Charlie Michel, resident of Bremerton for 17 years, and my commentary is about how Silverdale Way is addressed in the comp plan for multimodal transportation. I am a cyclist who both traverses around Silverdale and commutes to points within.</p> <p>I am addressing the area for Silverdale Way denoted in the Transportation section described as Phase 1 through Phase 6. Policy 6.1 states the aspiration to “maintain a seamless, interconnected, safe and convenient pedestrian and bicycle network to build a reputation of a Silverdale as a bicycle and pedestrian-friendly community”. There are references in the tables about adding bicycle lanes, but this appears to be infeasible. There is no room with five traffic lanes to add bicycle lanes on Silverdale Way between Bucklin Hill Rd and Hwy 303, so why is this even in the comp plan? There is no diagram showing how such lanes would be inserted between the space firmly bounded by sidewalks on each side.</p> <p>Bicycle/Pedestrian facilities on this section of Silverdale Way were included in the 2018 and 2019 TIP, then disappeared in 2020-2022 versions. Instead of apparently infeasible &amp; expensive proposals such as this, that over the years have come into, then disappear from the TIP, we need realistic solutions. Here are two:</p> <p>For those wishing only to travel past Silverdale, then we should focus on improvements along Chico Way, Provost Rd, and Clear Creek Rd. With widening and paving in some areas this would be a safe and low stress alternative to Silverdale Way. The attached shows what bike lanes like that might look like, based on what has already been done on Southworth Drive in South Kitsap. See attached.</p> <p>For those who wish to visit points within Silverdale, consider other alignments. For example, Bayshore Drive, Bucklin Hill Rd, then pave the Clear Creek Trail to Hwy 303. Along the way, add in laterals to provide access to points within the town.</p> <p>Rather than continuing the history of aspirational but infeasible, too expensive, never funded, and disappearing non-motorized projects within the Comprehensive Plan, let’s focus on creating some realistic solutions. Then apply for grants and get them built. We are doing this in Bremerton, we can do this in the County.</p> <p><a href="#">See attachment on page 419</a></p>
240	4/6/2024	Kelly Roberts	Comp Plan	Infrastructure, Environmental,	<p>Hello,</p> <p>I am reiterating my concern and request for the following lighting standard drafts to be more measurable and enforceable for the sake of our county's health and well-being, and specifically keeping our "rural places rural," as many of us have been saying for a while now.</p> <p>My italicized comments below are what I submitted via the Comment Form via the Comprehensive Plan Update page:</p> <p>Re: Drafted descriptions for exterior lighting standards for 17.105.110 and 17.420.30 C</p> <p>The language does not go far enough, and is not consistent, for both codes. Not only should exterior lighting on existing AND new developments NOT fall beyond one foot candle onto other properties, but there needs to be measurable criteria for the bulbs that will keep the illumination from overreaching and thereby creating light trespass in the first place. No more than 2700 Kelvins of temperature should be allowed - a warm white should be the brightest bulb allowed for use. There are MANY luminaires physically directed downward on both residential and commercial properties, but the emittance from the bulbs is so great that it causes beyond a 45 degree angle of uplight, which is clearly well beyond one foot candle. Also, because neighborhoods are not flat and grid-like in Kitsap county, but instead are hilly and winding, stray light goes almost EVERYWHERE. And because of that, to say that light cannot fall on only "adjoining properties" does not support all owners' rights to peaceful enjoyment and obstruction-free use of property (per RCW 7.48.010) since people's homes are above and below each other, elevation-wise. Both codes for existing AND new development should require downward direction, shielding, and no more than 2700 Kelvins of temperature in order to avoid light pollution. These factors are more realistic, measurable as mentioned, and enforceable.</p> <p>Clearly, our county is already running "hot" with light pollution (given how rural we are) per the screenshot below that I took from an interactive light pollution map:</p> <p><a href="#">See attachment on page 420</a></p> <p>As always, thank you for your time and consideration.</p> <p>Kelly</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
241	4/6/2024	Robert Barton	Land Use Element	Transportation, Land Use	<p>Greetings:</p> <p>Urban growth around the Apex Airport complex will become a safety hazard for air traffic and surface structures. Additionally, I am concerned that increased urban growth will result in attempts to close the airport.</p> <p>Airport overlays provide Airport Safety Compatibility Zones, which restrict land uses in order to promote the general safety and welfare of properties surrounding the airport. This overlay is an extension of airspace around the airport, typically a racetrack shape centered on the runway. Zones are established inside the overlay with varying restrictions based on the proximity of flight operations and the concentration of persons. Airport overlays will require all permit applications within the overlay zone to be reviewed and assessed for Airport compatibility.</p> <p>Apex Airport is the only significant airport between Bremerton and Port Townsend. It serves vital community needs and is included in Emergency and Disaster Preparedness Plans because of its location. Apex Airport has served as an alternate landing site for St Michael Medical Center, Law enforcement, the WA Dept of Fish and Game, San Juan Airways, the Civil Air Patrol, and many branches of the military. Recently, Bangor Naval Sub Base used the airport to launch drones in an exercise testing their defensive capabilities.</p> <p>This overlay is critical to the continued viability of Apex Airport and its vital importance to public service. Please support the inclusion of the Apex overlay in the new comprehensive plan.</p>
242	4/7/2024	Adam Brossard	Land Use Element	Transportation, Land Use	<p>We are concerned that new growth around Apex Airport is becoming a safety hazard and will result in attempts to close the airport.</p> <p>An airport overlay provides Airport Safety Compatibility Zones which restrict land uses in order to promote the general safety and welfare of properties surrounding the airport. This overlay is an extension of airspace around the airport, typically a racetrack oval shape centered on the runway. Zones are established inside the overlay with varying restrictions based on the proximity of flight operations and concentration of persons. It will require all permit applications within the overlay zone be reviewed for compatibility.</p> <p>As the only airport between Bremerton and Port Townsend, Apex Airport serves vital community needs and is included in Emergency and Disaster Preparedness Plans because the location is ideal. Additionally, it has served as an alternate landing site for St Michael Medical Center, Law enforcement, WA Dept of Fish and Game, San Juan Airways, the Civil Air Patrol and most branches of the military. Recently Bangor Naval Subbase used the airport to launch drones in an exercise testing their defensive capabilities.</p> <p>This overlay is critical to the continued viability of Apex Airport and the critical importance it holds in public service. I urge you to support the inclusion of the Apex overlay in the new comprehensive plan.</p>



Comprehensive Plan Comment Matrix - Comments Received through 4:30 p.m. April 11

Comment #	Date Received	Name	Category	Subcategories	Text
243	4/7/2024	Nicole Brossard	Land Use Element	Transportation, Land Use	<p>Area of comment 9.3, 9.a, 9.b.</p> <p>We are concerned that new growth around Apex Airport is becoming a safety hazard and will result in attempts to close the airport.</p> <p>An airport overlay provides Airport Safety Compatibility Zones which restrict land uses in order to promote the general safety and welfare of properties surrounding the airport. This overlay is an extension of airspace around the airport, typically a racetrack oval shape centered on the runway. Zones are established inside the overlay with varying restrictions based on the proximity of flight operations and concentration of persons. It will require all permit applications within the overlay zone be reviewed for compatibility.</p> <p>As the only airport between Bremerton and Port Townsend, Apex Airport serves vital community needs and is included in Emergency and Disaster Preparedness Plans because the location is ideal. Additionally, it has served as an alternate landing site for St Michael Medical Center, Law enforcement, WA Dept of Fish and Game, San Juan Airways, the Civil Air Patrol and most branches of the military. Recently Bangor Naval Sub Base used the airport to launch drones in an exercise testing their defensive capabilities.</p> <p>This overlay is critical to the continued viability of Apex Airport and the critical importance it holds in public service. I urge you to support the inclusion of the Apex overlay in the new comprehensive plan.</p>
244	4/7/2024	Jeff Fraisure	Land Use Element	Transportation, Land Use	<p>This comment regards section 9.3, 9.a, and 9.b and how it affects Apex Airport.</p> <p>The airport itself lies on 15 acres roughly parallel to the southern end of Willamette Meridian Road, is 2500 feet long, paved, and lighted. It is used by propeller powered aircraft and helicopters. It is too short for any type of jet.</p> <p>I have been a resident of Apex Airport since 1975 and a part owner through the Apex Property Owners Improvement Association (APOIA) since 1980. At that time Apex was rather remote from any large developments nearby.</p> <p>In the 49 years since, I have witnessed numerous housing developments built in the vicinity of the airport. We have always been sensitive to the fact that housing areas can be incompatible with aircraft operations and have worked with the county in the past to mitigate that threat through airspace easements around and building restrictions on the approach and departure ends of the airport.</p> <p>Apex Airport Is owned, maintained and operated at the expense of APOIA members (about 40) with no funds from any government agency.</p> <p>Apex Airport is open to the public and to military helicopters, law enforcement, medical evacuation helicopters from St. Michaels Medical Center, Harborview, and other government agencies 24 hours a day at no cost to them. It serves the Silverdale, Poulsbo, and East Bremerton area. Apex is part of the Emergency and Disaster Preparedness Plan due to its ideal location. Sub Base Bangor recently used Apex as a launch point for security drones. Any restrictions placed on Apex would constitute a loss to the residents of these locales as the only other airports in proximity are Bremerton National, Port Orchard, and Port Townsend, which are significantly farther away. The loss of Apex through restrictive operations (or outright closure) would constitute an irreplaceable loss on this community.</p> <p>Therefore, I urge you to institute an airport overlay which will provide an "Airport Safety and Compatibility Zone" (ASCZ) for the safety of properties around the airport to insure the compatibility of land use within the zone. The overlay is a racetrack shaped extension of airspace around the airport and centered on the runway. Any building permit applications within the zone would need to be reviewed for compatibility and require signature notification of the owners of the existence of the ASCZ.</p> <p>Apex is an essential facility provided to the community at no cost. Please help us to continue that service into the future.</p>

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245	4/7/2024	Dragan Karadzic	Comp Plan	Health, Land Use	<p>Dear Kitsap County Commissioners,</p> <p>As you discuss the Comprehensive Plan, I urge you to consider Alternative 3. I feel that it will be the best option to positively affect the mental and physical health of the children of North Kitsap.</p> <p>I have coached volleyball on the Peninsula for over 20 years and have seen options for the sport continuously decrease over the years. Previous to the Covid pandemic there were 3 junior clubs providing opportunities and fielding over two dozen teams. Today that number has been reduced to 2 clubs and 8 teams. The local school districts are not friendly to outside community groups and the Kitsap Pavilion, which used to host both practices and junior tournaments, no longer does.</p> <p>The mental health of our children was already precarious previous to the Covid pandemic and has steadily deteriorated since then. I have attended multiple meetings that have focused on the public and private efforts, led by North Kitsap United, to develop a multi-use project, along with establishing a new YMCA. All the meetings have focused on the effects of such a development to the land in the area. Virtually no discussion has been had on the positive outcomes our children would enjoy from such a development.</p> <p>I would urge you to take a look at the Washington State Health Youth Survey at <a href="http://www.askhys.net">www.askhys.net</a> to get a better idea of the struggles that our children face.</p> <p>The survey is rich in detail. What stands out is the Mental Health section for Kitsap County. 68% of the children in the county report feeling nervous and anxious. 19% have contemplated suicide and 9% have attempted it. Surely a positive development, such as the North Kitsap United project, will help our children.</p> <p>I understand that the type of facility and recreational space will not be the cure all for these challenges. However, after 44 years of coaching, I have seen many children whose lives have been positively affected through their participation in athletic activities. Although now retired from coaching, my job as the Operational Director for the local administrative region of USA Volleyball keeps me in touch with multiple organizations providing healthy opportunities for our children.</p> <p>Once again, I urge you to support Alternative 3 as a step forward towards providing a healthy and happy place for our children.</p> <p>Sincerely, Dragan Karadzic Operations Director Puget Sound Region of USA Volleyball</p>
246	4/7/2024	William Roark	Land Use Element	Transportation, Land Use	<p>Comment area 9.3, 9.a, 9.b</p> <p>Regarding Apex airport which was established in 1946 is an "Essential Public Facility". With encroaching housing developments the county should be concerned for the protection of the airport. Apex has served the community with US Coast Guard flights, US Army flights ( Chinook helicopters transporting troops from Bangor) , Army helicopter training flights , King county Sherriff's department, Lifeflight air ambulance, Fish and wildlife department as well as many charter and transient aircraft that service our community. Apex also has been involved in aviation programs provided by Central Kitsap schools.</p> <p>Apex has been a good neighbor, we publish our fly quiet guidelines and make every effort to minimize our impact. Light industrial is the most compatible zoning around public airports, I highly encourage the County to keep zoning around the airport limited to such .</p> <p>Thanks for listening, Bill Roark</p>
					<p>Hello,</p> <p>I’m writing to urge you to deny Raydient’s rezoning applications in the ~400 acres near NKFHP and Bond Rd.</p> <p>FWIW, and in the unlikely event you choose to read more, here’s the backstory. I’ve tried to remain cogent and focus on what I believe is the greater good, which balances growth with livability for long-term residents.</p> <p>I moved to Kingston in summer 1999. Kingston and the surrounding area have changed since then, of course, and the result is mixed. Mostly good, I suppose. Change for better or worse is inevitable, apparently. The largest decline in livability in the last 20+ years is in relation to traffic density and travel time, the hazards to pedestrians and bicycles, and sense of congestion. All of that has become much, much worse, to the point where I no longer bicycle on the roads. It’s too dangerous. North Kitsap United (a name that’s a lot like “Holy Roman Empire” in its</p>

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					<p>inaccuracy and intent to deceive) will, by itself, add five+ years of ordinary development to the traffic on Bond and related areas, but it'll do that in just one year. Everyone, whether they use the facilities or not, must share this new burden forever after. This is very bad. Newcomers might not know the difference, but those of us who've been here a while are going to feel pain.</p> <p>NKU is not transparent about their motives or finances, but it's not difficult to suss out the broad outlines. They have two choices: one is to sell off 20-acre plots, a process that is probably going to take years. The other is to sell the local yokels on a plan to rezone to quadruple the housing density and create for themselves two long-term anchor tenants. Option two will take less time to complete and yield much more profit, so much so that they're making generous – as a crocodile defines generous – offers to the community in exchange for our support. When they bought that block of land, it was based on the gamble that rezoning could be pushed through. Thus, the public relations blitz and your latest headache.</p> <p>If they sell off large plots of land that can have one primary dwelling each, when the plots are eventually all gone, nothing is left behind to earn revenue for the future.</p> <p>If you allow rezoning, Raydient gets 80 highly desirable single-family dwellings, and they'll get to choose all the contractors. In the end, they'll probably own the water treatment facilities and the roads, and possibly other infrastructure, which must be maintained forever. There will be deals made with lenders. An HOA with obligations to Raydient. In contrast to selling 20-acre plots, this income stream has no foreseeable end. If they “donate” the land to a YMCA and “donate” the land for a sport complex with A CAFÉ! (they make much of that), they end up with two or more anchor tenants for the long term. The tenant owns the improvements, but Raydient owns the land. Tenants with a high capital investment to tie them down provide a long-term revenue stream that's likely to appreciate with time. Quick sales + HOA + tenants. They'll do or say anything to push that rezone through.</p> <p>For all that they stand to get, they offer to pay for a roundabout, and talk about how great it'll be to stop by the Y on the way to or from work, and how that apocryphal single mom will choke up with gratitude when she describes what a godsend it is to dump her teens at flag football for a few hours. How many people, really, will choose to use either of these idealized options out of the entire population that will be impacted by the development? How does that number compare to the number that must deal with the traffic &amp; increased travel times on their way to and from work and errands, every day and most of all on weekends? What happens when ferry traffic meets flag football practice, and some hapless schmuck (like me) leaves the house to go to Silverdale at the wrong time? Will there ever again be a right time? This development will put a bottleneck at one of the worst places I can think of to put it.</p> <p>The Rotary Club is all-in for this project, if their mouthpiece in the community rag is a guide. Let's be brutally honest: the average age of a Rotarian is ...advanced, going on deceased. They're a group that measures diversity by the furlong. They represent a narrow slice of the community and related commercial interests – and I get the sense that they're politically influential despite their miniscule numbers, if for no other reason than that many of them have lived here since before zero was invented. Many of them won't be around to live with the long-term consequences of allowing the rezoning to proceed. They're financially well off, not concerned much by an annual membership at the y or pickleball court fees. Local contractors and businesses want the bump they imagine this project will bring, and their values &amp; priorities are such that the lowered quality of living for the rest of us is just a price they're willing for me and everyone else to pay, like it or not. Speaking as a person who has to pay the bills they're scheming to stick me with, I'm not willing to enable development and profit for a few at the expense of the many. Especially if I'm among the many.</p> <p>This development affects everyone in the area, but it will only benefit the people with the economic means, mobility, and inclination to make use of it. The Y isn't for everyone, and it's not getting any cheaper with time, thus pricing more people out of the group that can use it. I'd probably join for the pool, and I can afford the fees. But I'd really rather leave the land as it is. That's worth more to me than adult lap swim. None of this is a great big win for the children, except for a relatively elite population. Not every kid plays those sports, and not every family can afford the expense.</p> <p>This development sets the stage for this entire area to go the same way that the area east of Redmond went in the 90's. I was there; I saw that happen in real time. That's why I moved to Kingston. Now, the pattern is repeating. Eighty high-end homes, a sports complex, and a YMCA will anchor future development at the expense of rural area, and it'll embolden future rezoning requests. The current comprehensive development plan can be changed. Raydient is challenging it now. Others will follow. Political influence follows the money. Today's plan to “ensure” that North Kitsap retains its semi-rural character is tomorrow's superseded plan. The decisions you make now will determine the future. Allow major variations from the plan to satisfy narrow interests, and you'll help to ensure that more of the same will follow. That's how you destroy a plan from the inside.</p> <p>If the lots are sold in 20-acre units, it seems likely (my opinion based on possibly wishful thinking) that much of it won't be developed but will go to private estates and possibly light commercial. This implies that after Raydient cuts all the existing trees down, much of the area will be permitted to regenerate. It'll take them years to sell it all, but probably not long enough to get another harvest. Maybe it'll eventually support some small-landowner harvesting. My hope is that the long-term development won't be as dense as what's proposed in Kitsap United. Maintaining the current zoning is – I believe -- a win for the local environment in the longer term, 10+ years out. And it's the best thing to preserve, for as long as possible, the quality of life</p>



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247	4/8/2024	Glenn Minch	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>for the greatest number of residents in the area.</p> <p>Here are a last few points to consider:</p> <ul style="list-style-type: none"><li>•A place I really cherish will be destroyed either way. If Raydient gets their way, it'll be wiped out in a flash, as fast as you and other agencies will let them. IF they don't get their way, the area will be closed off for spite. Either way, it's gone to me. I hike there twice a week every week all year around. Port Gamble is the closest trailhead, and it's also mostly quiet and low-traffic. I have walked every trail &amp; road in the Raydient block and in the entire forest at least as far north as Ankle Biter. I'll miss the section that Raydient is determined to destroy. This is a real loss for me, and I'm going to miss it. The proposed green area won't be the same. It'll be a gentrified, overused, human-impacted area that is degraded far below the UWI it is now. This is a big loss to the community, and a tiny loss to the world – but every nibble takes a toll on the whole. Apparently, Raydient can't be stopped, but they can be contained so that the damage is minimized to the least worst outcome. That is what I'm asking you to do by denying the rezoning application: give us the least worst outcome. It will add more traffic and slow existing traffic at a critical juncture along the only viable way out of the area to reach just about everything.</li><li>•More nighttime light and noise. The proposed site is several miles from me, but the night glow from the lights will light up a part of the sky that doesn't have light now. Life for every existing homeowner for a mile around will change, just due to the lights and shouting. I know; I live a half mile from the high school, and I can hear the games clearly. It doesn't bother me because it's infrequent. IF you build a sports “complex,” that noise will be there all weekend and every evening, forever.</li><li>•All that forest and scrub will be gone, forever. The area under the Y and the holy CAFÉ and the sports fields and all the parking lots and houses and paved roads is NEVER coming back in a human lifetime, probably not several lifetimes. It's gone, replaced by pavement, turf, lights, and traffic.</li><li>•The schemers at Raydient and their Kingston Rotary dupes don't deserve to grab the cash and let the rest of us take the hit.</li></ul> <p>In the unlikely event that anyone reads all that, wow, you have endurance! Thanks for reading.</p> <p>Sincerely,</p> <p>Glenn Minch Kingston, WA</p>
248	4/7/2024	KEC - Beverly Parsons	Comp Plan	Land Use, Environmental, Economic	<p><a href="#">See pages 421-428</a></p>
249	4/7/2024	Marion Allen	Comp Plan	Environmental, Land Use	<p>Commissioner's Hearing 4/8/2024</p> <p>Hello Commissioners, my name is Marion Allen, I have lived in the Poulsbo area for 36 years, raised my daughter here and now I am retired and work as a lead volunteer in the parks, I also lead weekly native plants hikes in the parks and I am a member of a local environmental group.</p> <p>Thank you, Commissioners for the time you devote to Kitsap County, its shores, its streams, its wetlands, its lowland forests, its wildlife and the people who live here. You will be listening to many voices tonight to help create a plan for the future. We don't know exactly what the future will look like, but we know we need to put a lot of forethought into this plan to create a resiliency that will make life less of a struggle for future generations.</p> <p>You already know the answers to many of the puzzles because you are all wise women who listen to science. You know that to be resilient we must leave our mature forests. We must retain all of our wetlands. We need our rural lands for farmers to produce local food sources. If we don't do these things the future in Kitsap County will be bleak.</p> <p>I want to talk about wildlife and wildlife habitat. Kitsap County needs to implement a system for wildlife refuges and wildlife connectivity. From the PROS plan: more than 75% of our parks and open space acreage are located in our Heritage Parks. With the exception of trails running through parts of these parks these lands remain, and should remain primarily undeveloped natural areas, with environmentally sensitive areas preserved or enhanced. The physical characteristics of these lands lend themselves to varied passive and conservation uses. We are in need of healthy habitat for animals from insects, amphibians, and birds to bears, with native plants and healthy forests to restore healthy pollinator populations which all are necessary for life. If they can't survive, neither can we.</p> <p>Along with climate issues, humans are causing species to go extinct at much higher rates than would be normal. Pavement, housing ,yards with non native species, and cutting down our urban tree canopies.</p> <p>Biodiversity is key. Extinctions causes chain reactions that effect humans and we are being near sited in this county if we don't reserve refuges solely for our wildlife, not only to survive but thrive.</p>
250	4/7/2024	Robert F Jr. Losey	Comp Plan	Transportation, Infrastructure	<p>I am a Pilot and want to let you know I support Apex Airport as a vital part of community and a public asset.</p>



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251	4/7/2024	KEC - Martha Burke	Parks Element	Land Use, Environmental, Economic	<p>Our specific comments as members of the Kitsap Environmental Coalition on this chapter are attached via a file attachment shown below. But we would like to summarize our major points by stating that large, natural parks, especially the six Heritage Parks, are close to most Kitsap citizens physically and represent the essence of what it means for many to live here. The ecology of these important parks serves as habitat for critical wildlife, improves air and water quality, enhances resilience to climate change, and provides a variety of recreational opportunities. The parks need to be supported and protected. Volunteers are an important component of that support, and they donate many hours of their time each year to that effort. That dedication should be acknowledged and their participation and consultation encouraged by Parks. Essential though the volunteers are, Parks also needs adequate funding to manage this important asset, and it needs to clearly identify both its current as well as future capital and operational needs, in a comprehensive master plan. Such a plan is especially needed for the Heritage Parks, a plan that starts by clearly identifying and describing the entire physical and natural attributes of each park and then works up from that base to determine its natural uses, involving the public and park users and volunteers in that task. Only then will Parks and the County have a clear idea of what funding is needed. Some of this was laid out in the 2018 PROS plan, but that plan needs to be revised. Major projects should not be initiated in the parks until this work is done first.</p> <p><a href="#">See attachment on pages 429-439</a></p>
252	4/7/2024	William Turner	Comp Plan	Comp Plan Edits	<p>Dear Commissioner Walters, and fellow Kitsap County Commissioners,</p> <p>I write to request your urgent assistance regarding correction of a mapping error that has occurred with the 2024 Kitsap County Comprehensive Plan. I have included a letter and exhibit of the pertinent map correction request (please see attached). I appeal to my elected representative as my last opportunity to be heard as a citizen of Kitsap County.</p> <p>Additionally, I look forward to providing testimony regarding this request at the April 8th public hearing regarding this decision. I look forward to your response to our request and thank you so much for all the great work that you do for our community, it is so appreciated.</p> <p>Thank you, William Turner</p> <p><a href="#">See attachments on pages 440-442</a></p>
253	4/7/2024	Charlie Michel	Comp Plan	Environmental, Infrastructure	<p><a href="#">See pages 443-444</a></p>
					<p>COMMISSIONERS MEETING-COMPRESIVE PLAN INPUT APRIL 8TH 2024 HISTORICAL PROPERTIES IDENTIFY AND ENCOURAGE HISTORIC PRESERVATION GMA GOAL. PLEASE IDENTIFY AND ENCOURAGE THE PRESERVATION OF LANDS, STRUCTURES, SITES THAT ARE OF HISTORICAL AND CULTURAL VALUE AND INCORPORATE THEM INTO THE COMPREHENSIVE PLAN. ONCE GONE, GONE FOREVER. FISHER PLAT ENETAI IS DEEP IN HISTORICAL IMPORTANCE THAT NEEDS TO BE INCLUDED DOCUMENTED AND PRESERVED IN THE HISTORICAL SECTION OF THE COMPREHENSIVE PLAN. THE FISHER PLAT WHICH HAS BEEN A PRIME COMMUNITY CONCERN IS NOW FACING POSSIBLE DENSE DEVELOPMENT. HOW CAN THAT BE? ZONING THAT ERRED, AND THE LACK BY KITSAP COUNTY TO IDENTIFY AND PRESEVE ITS SPECIAL PLACES IN HISTORY. HERE’S THE HISTORY OF THE FISHER PLAT AND ITS RESIDENTS: THIS IS THE 65 ACRE PARCEL OF WILLIAM BREMER FOR WHICH THE CITY OF BREMERTON WAS NAMED. BREMER IS ALSO RESPONSIBLE FOR THE DEVELOPEMENT OF THE PSNS. MR ALVIN CROXTON WASTHE FIRST MAYOR OF BREMERTON LIVING ON THE NOW FISHER ESTATE</p>

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254	4/7/2024	Judith Krigsman	Comp Plan	Land Use	<p>MR. ALVIN CROXTON, WASTHE FIRST MAYOR OF BREMERTON LIVING ON THE NOW FISHER ESTATE.</p> <p>BEN CHENEY, LUMBER BARON AND HONORED BY NAMING CHENEY STADIUM IN HIS HONOR IN TACOMA.</p> <p>THE FISHER PLAT WAS ADJACENT TO THE FIRST MILL SITE OF THE PORT ORCHARD MILL AND IS ON THE NATIONAL HISTORIC REGISTRY.</p> <p>NOT ONE OF THESE FOLKS EVER CUT A TREE IN THE DENSE FOREST THERE AND THESE ACRES REMAIN IN OPEN SPACE TODAY.</p> <p>STEEPED IN HISTORY PART OF THE MOSQUITO FLEET TRAIL, OF TRIBAL SIGNIFANCE, OLD GROWTH FOREST, ABUNDANT WILDLIFE AND WILDLIFE CORRIDOR TO ILLAHEE STATE PARK AND THE ILLAHEE PRESERVE, STEEP SLOPES, WETLANDS, ENETAI CREEK, A FISH STREAM, AND RICH NEAR SHORE HABITAT, NOW FACES A DENSE DEVELOPMENT WHICH THREATENS WHAT SHOULD NEVER HAVE HAPPENED DURING THE 2016 COMPREHENSIVE PLANNING STAGES. THE HISTORY OF THIS PROPERTY IS OF</p> <p>UTMOST IMPORTANCE. ONCE GONE, GONE FOREVER. HOW DO YOU ZONE PROPERTIES OF HISTORICAL SIGNIFICENCE? CERTAINY NOT FOR A PLANNED 189 UNIT DEVELOPMENT.</p> <p>STEP UP NOW AND IDENTIFY THE RICH HISTORY IN KITSAP COUNTY IN THE COMPREHENSIVE PLAN. THE PLAN IS SORELY LACKING IN THE IDENTIFICATION OF HISTORICAL PROPERTIES AND APPROPRIATE ZONING FOR THEM IN THE COMPREHENSIVE PLAN REQUIRED BY THE GROWTH MANAGEMENT ACT AND IN THIS PARTICULAR CASE, THE ILLAHEE COMMUNITY PLAN.</p> <p>THANK YOU, JUDITH KRIGSMAN</p>
255	4/7/2024	Sheila Lally	Comp Plan	Transportation, Infrastructure	<p>Name: Sheila Lally</p> <p>Resident of Suquamish, in Kitsap County for 26 years</p> <p>Avid cyclist, runner, and hiker</p> <p>Location of Interest: Miller Bay Rd. in Suquamish, WA</p> <p>Miller Bay Rd. is used by many computers, on a daily basis, who catch ferries from either Bainbridge Island or Kingston to Seattle, where they work. They commute by bicycle because they care about the environment and their carbon impact. I have lived in close proximity to this road and bicycle on it frequently. The road has been resurfaced two or three times in the years that I have lived there, and while there is room along the side of the road to include a paved shoulder, that has NEVER been done. Instead, they left gravel, 3-6” below the level of the pavement, placing cyclists at huge risks. Because there was no paved shoulder and the road is narrow, a friend of mine was essentially forced off the road by a passing motorist, causing him to crash - he sustained a potentially life-threatening flail chest. This road is narrow, windy, and dim due to the dense forest it passes through. This is a major thoroughfare in Kitsap County, linking Poulsbo and Bainbridge Island to Kingston. In addition to runners, walkers, and commuters, it is a road that many visiting cyclists from Seattle take as they make their way to the Port Gamble trails and Olympic Peninsula. It is an ideal route to link the multi-use path along Hwy. 305 to the Heritage Park Trails, Port Gamble Trails, and the Olympic Discovery Trail, BUT, it needs to be made safer for cyclists and pedestrians!</p> <p>Miller Bay Rd. is a segment of the historical Mosquito Fleet Trail, which was listed as “high priority” for a shared use pathway in the 2001 Bike Facilities Plan. It is also a County Bike Route, which prioritizes it for bike safety improvements, because it connects Bainbridge Island, Suquamish, and Kingston. Sometime ago, minimal improvements were made by adding a small amount of additional gravel to the shoulders, but despite previously ‘planned’ improvements, nothing has been done to this road to assure biker and pedestrian safety. There is ample room along this road to construct a 5-7 foot well marked, multi-use biker/pedestrian lane to assure this road is safe for the many commuters, cyclists, runners, and pedestrians who frequently travel along it. In addition, this would facilitate the county’s goal of completing the Olympic Discovery Trail, which is a significant attraction for tourists coming from Seattle and other parts of the country, thereby boosting our local economy.</p> <p>Sheila C. Lally, DO</p>

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256	4/7/2024	Mark Libby	Comp Plan	Land Use, Health, Raydient Reclassification	<p>Commissioners and Planners,</p> <p>It is our vision and opinion that the Comprehensive Plan should specifically address the current and future needs for active recreation facilities in North Kitsap. In our opinion, that need can best be satisfied by adopting Comp Plan Alternative 3 that supports development in current rural areas.</p> <p>Please seize the opportunity to develop a 20 year Comprehensive Plan that specifically includes the active recreation facilities that are needed to ensure the health, longevity and quality of life that the North Kitsap community deserves.</p> <p>There are not sufficient fields, courts and active recreation facilities to meet the needs of the current North Kitsap population, let alone the needs for the projected population growth. Despite the claims of a vocal minority, it is our contention that a statistically competent survey of North Kitsap residents will show overwhelming support for development of an all weather sports complex including a facility with a swimming pool.</p> <p>Thus the rationale for Alternative 3: Sports fields, courts, pools and recreation facilities require significant acreage, and they should be centrally located with easy access to the majority of the projected future population. It is not efficient or feasible to locate the needed facilities within the projected Kingston UGA because of the limited buildable land and the constraints of wetlands and geographic features.</p> <p>We also ask you to promptly approve the requested rezone of the Rayonier property at the SE corner of the Port Gamble Forest Heritage Park. As outlined in the attached document, the proposed cluster development provides the significant benefits of about 200 acres of open space. The combination of clustered parcels and open space is a means to preserve the rural character of NK and minimize the environmental impact of development. The open space would effectively be an expansion of the PGFHP, preserving public access to the PGFHP, several key biking and hiking trails that cross Rayonier property, and offer the opportunity to develop a strategically placed sport’s complex.</p> <p>Thank you for your consideration, Mark &amp; Kris Libby Kingston, WA <a href="#">See attachment on pages 445-446</a></p>
257	4/7/2024	Darren Vlahovich	Land Use Reclass (Site Specific)	Land Use, Site Specific	<a href="#">See pages 447-448</a>
258	4/7/2024	Ron Vandervort	Comp Plan	Transportation, Infrastructure	<a href="#">See page 449</a>
259	4/8/2024	Kirk Garoutte	Comp Plan	Transportation, Infrastructure	<p>I would like to submit my comments regarding the Apex Airport.</p> <p>I live on the Airport and also work on the Airport. I feel it is an important asset to the community and it should be protected from encroachment by any and all means.</p> <p>It serves the public’s interest as well as options for the military when needed. It is also an asset for emergency Response if needed.</p> <p>It is funded by private money and has no impact on taxpayers. A public use policy exists for all aviation activities.</p> <p>Developing land around the airport will have a negative impact on Myself and my fellow pilots and neighbors. We all contribute with property taxes and employment opportunities.</p> <p>Thank you for your time Kirk Garoutte</p>



Comment #	Date Received	Name	Category	Subcategories	Text
					<p>Dear Kitsap County Commissioners, Parks Department Heads &amp; Comp Plan Personnel and Planners,</p> <p>I am writing in an effort to further educate you on our Kingston-North Kitsap Rotary multigenerational indoor and outdoor sports and recreation complex project and to urge you to strongly consider approving the Raydient rezone application off Stottlemeyer Road in Kingston-Poulsbo.</p> <p>We as a community and as Rotarians are aware of how challenging this decision is for you. I personally do not envy being in your position. But as leaders, we have to make tough decisions for the greater good of all. For that reason, I feel it is very important for you to be aware of what efforts and consideration we have gone thru as well as know what the benefits are as a result of your approval decision.</p> <p>First off, our Kingston-North Kitsap Rotary Club has scoured North Kitsap for years trying to find enough open and/or flat space to fulfill our need for this project. As you are well aware, our Kitsap area - especially in North Kitsap and in and around Kingston - has a lot of challenges pertaining to chunks of land, greater than 20-acres - of which, are all usable and contiguous and aren’t deemed critical areas constrained by wetlands, streams and other mitigation needs and issues - regardless of it being inside the UGA or not.</p> <p>As we have pointed out in our various presentations to the public over the last year-plus, this concept and plan was a project Kitsap County was going to do over 20-years ago (see attachment). (Side note: there has been no new sports fields built in our entire county since 2012 - something the 2012 PROS Plan identified as a priority thru public-private partnerships and community organizations.) Since it hasn’t been done and there are no other known efforts to get it done today, this is why we are here trying to unify our community to make this happen and need your help and partnership.</p> <p>After it is all said and done, this 400+ acre parcel would provide the County with a couple of immensely positive benefits for decades to come:</p> <p>1. Because the majority of our kids’ practices and games are in Poulsbo or outside of our area (most often Tacoma, Puyallup, Centralia, Tri-Cities and Spokane), this project would allow for less time families spend in their car and cut down on the miles being driven on our County roads by Kingston, Hansville, Eglon, Indianola and Suquamish residents to attend practices and games. Doing so helps alleviate some Poulsbo-area traffic choke points and less road time equates to likely less County maintenance dollars to road improvement needs over time. In addition, with rising fuel costs and the inflationary pressures of today and likely tomorrow, shorter travel distances helps lower income and working class family’s afford to get their kids involved in activities.</p> <p>2. Provide a cohesive partnership with the YMCA to help our kids learn how to swim, offerings of more kids camps to augment their developmental learning skills when school is out, add much needed child care services lacking in our area, give our community more mental health counseling and resources - something desperately lacking, and provide another location for extreme weather shelter needs when they arise - among many other benefits. Also, as numerous studies show, if we give our youth activities and things to do, it will cut down on crime and vandalism and most likely keep our kids from getting introduced to drugs - a growing problem in our communities today;</p> <p>3.) This complex would allow our community to host tournaments - rather than leave our area to go to tournaments. The today’s economic loss to our local business owners vs. tomorrow’s beneficiaries are incalculable but tremendous year after year after year. It will inject money into our local restaurants, promote shopping opportunities at various storefronts, bring people to stay and play at our tribal casinos and hotels - among other various benefits. Today, those dollars are taken and spent elsewhere - no economic benefit to our County. These sales tax revenues would be all net positives to County coffers - which, in turn, helps you with future budgeting revenues;</p> <p>4.) It would allow for ~80-total homes worth of inventory to help with our housing problems today as well as help absorb some of the future growth you are anticipating in our area (why prices continue to skyrocket - too many people chasing too little available);</p> <p>5. Because of Raydient’s home clustering plans, ~200-acres of land would be given to the County or donated to a Non-Profit to preserve even more land to add to the Heritage Park trails in existence now. This would give and help maintain adequate wildlife corridors while helping best preserve many of the water and aquifer concerns our community needs. This is especially true considering and comparing Raydient’s alternative – sell off twenty 20-acre lots. Being realistic, very few if any of those future residents will work together to better wildlife conditions/corridors, build retention ponds, improve water quality needs, expand trails and open space, etc. on their properties - all the things we are proposing and will do with our project.</p> <p>6.) Another important factor as a result of your decision is the positive economic impact you could influence on the North Kitsap School District. Since more than 80% of all our sports activities for our youth in the north-end of the County is on school district property, this would allow the school district to commit less custodial and maintenance staff time and money towards ongoing maintenance expenses and more towards educational expenses - where their money should be primarily focused and directed. Again, as we’ve shown in our presentations, the field conditions on our school’s properties continue to deteriorate because they don’t have the funding to keep the fields and gyms in appropriate, reliable and usable conditions. Since we have more and more kids playing (thousands) and more and more practices and games in/on these facilities, it continues to perpetuate a vicious cycle of deterioration - one that won’t be solved unless we lessen our population, lessen the usage or add facilities for today’s/tomorrow’s needs, and;</p> <p>7.) Meet a critical GMA goal: “to stimulate the health and welfare of human beings”. Active recreation is critically important to that goal - especially to our youth. The lack of offerings in the north-end of Kitsap County is glaring and needs to be addressed. Our question to you – if we don’t work together to do it, who will? When?</p>

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260	4/8/2024	Kingston -North Kitsap Rotary Club - Clint Boxman	Comp Plan	Land Use, Health, Raydient Reclassification	<p>Our Public-Private-Corporate-Government-Non-Profit corporative project instills exactly what the County Comp Plans of 1998, 2014 and 2018 said it would do but still has yet to truly fulfill. I urge you to go back and read those documents.</p> <p>If you/we truly want a vibrant and diverse community, you need to provide the amenities that attract a population of all ages. If there aren’t facilities and amenities to provide to young families, how and why would you expect a young family to move and stay here?</p> <p>The items above are just a quick list of some of the major things and benefits that would happen as a result of your careful consideration and approval vote for Raydient’s rezone request and the ensuing dominos that follow. This again isn’t just a sports thing. This isn’t just a youth thing. Our end goal is to provide a space that anyone - regardless of age - could utilize for their active recreational needs (something that just happens to conveniently be centrally-located in our County)... whether that be for birthday parties, family gatherings, business team building excursions, etc. It is easy for us to envision and highlight the benefits for all Kitsap residents and we hope this letter is just a start in providing insight into that.</p> <p>Also enclosed in this letter are notes pertaining to all our studies and efforts to date help augment the PROS Survey in understanding today’s needs in the area of sports and recreation. If you have any questions or would like to converse more about this topic, please don’t hesitate to reach out to me.</p> <p>Thanks for your time and consideration! -Clint Boxman <a href="#">See attachments on pages 450-461</a></p>
261	4/8/2024	Ron Carter	Comp Plan	Site Specific, Land Use, Raydient Reclassification	<p>To Our Kitsap County Commissioners:</p> <p>Greetings. My name is Ron Carter. I am a member of Kingston North Kitsap Rotary Club. I write in support of any option in the Comprehensive Plan update that would allow for, and support, development of the centrally-located, all ages, sports and recreation complex in North Kitsap, known as NKUnited. I write a monthly Rotary column that is published in the Kingston Community News.</p> <p>My thoughts, which I urge you to read, are laid out in the attached article that appeared in the April edition of Community News. Thank you.</p> <p>Ron Carter <a href="#">See attachment on pages 462-463</a></p>
262	4/8/2024	Paul Dutky	Comp Plan	Transportation, Infrastructure	<p>Please see attached testimony for the Commissioners meeting today, April 8, 2024. It is somewhat longer and more detailed than my oral testimony will be.</p> <p>Thank you,</p> <p>Paul Dutky <a href="#">See attachment on pages 464-467</a></p>

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Comment #	Date Received	Name	Category	Subcategories	Text
263	4/8/2024	Chartwell Land Company - Levi Holmes	Comp Plan	Island Lake Reclassification	<p>Good Morning Commissioner Rolfes,</p> <p>I understand it is not typical to consider site specific rezones during a general comprehensive plan update. However, I do believe the benefits for environmental restoration, affordable housing, missing middle housing, and transfer of development rights is also not typical with a site specific rezone and therefore at least warrants consideration.</p> <p>It is my understanding that the Board of Commissioners will vote on the preferred alternative by the end of April. I'd like to ask you and the Board to at least discuss this option during deliberations. An opportunity such as this, to collaborate with the Board and create so many public benefits, does not come along very often. I am available for questions/clarifications and will also attend the public meetings.</p> <p>I have attached a letter to this email with further details on this request.</p> <p>Best Regards,</p> <p>Levi Holmes</p> <p><a href="#">See attachment on pages 468-470</a></p>
264	4/8/2024	April Ryan	Comp Plan	Environmental, Comp Plan Edits	<p><a href="#">See pages 471-474</a></p>

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Comment #	Date Received	Name	Category	Subcategories	Text
265	4/8/2024	Dianne Iverson	Comp Plan	Transportation, Infrastructure	<p><a href="#">See pages 475-476</a></p> <p>I think terminology matters. To wit:</p> <p>01. Wildlife.</p> <p>To most people, and especially to state and county agencies, "wildlife" translates to what we can hunt. Mammals, from rabbits to bear, and birds big enough to eat. What's missing in our efforts to preserve habitat for wildlife is expressed concern for two of the five classes of vertebrates - amphibians and reptiles, both in decline. Physical and chemical destruction of habitat is the clear and present threat to both. The 'wildlife' concept needs to be extended to include all five vertebrate classes, at a minimum...</p> <p>Salamanders and snakes, shrews, sapsuckers and salmon are all 'wildlife'. Acknowledge that and the fact that no matter their unfamiliarity to many of us, all contribute to ecosystem function, thus qualifying for conservation. What wildlife are we protecting? Name species and required habitats. Rename 'Department of Fish and Wildlife'. ;)</p> <p>02. Heritage Parks.</p> <p>I once asked Rob Gelder, in a meeting requested by SAPs (Stewards Against Paving), what was the meaning of Heritage (as applied to parks)? His response? "It's just a word". His attitude reveals the linguistic wiggle room capitalized upon by too many bureaucrats. Heritage is a feel-good term applied to larger county properties, likely intended to impress taxpayers with a vague ownership rationale (protecting it's 'heritage').</p> <p>For NKHP there is no evident cultural heritage (except, of course, original occupation). The only other applicable heritage, in view of the ongoing deforestation and the mind-numbing scale of accelerating development of North Kitsap for profit, is biological. NKHP should be declared a biological reserve, managed in the manner prescribed in the Steward-authored Master Land Plan for NKHP.</p> <p>03. Parks.</p> <p>A more fundamentally flawed term for the larger county properties is to call them 'parks'. For most taxpayers the inherent implication is that it refers to a recreational area, with all of the infrastructural expectations thereof. A shirttail derivative of 'National Parks', this terminology is too big for local reality. NKHP can easily be overused, too over-populated for continued full ecosystem function. Too easily subdivided, inhibiting movement, isolating small wildlife populations. Call them Biological Preserves thus emphasizing their true value.</p> <p>04. Natural Resources.</p> <p>We often hear of bureaucratic concern for what they call 'natural resources'. The misimpression is one of concern for ecosystem sustainability and biodiversity. The reality is very different - an almost Biblical sanctioning of the unrestrained use of all that nature provides, for profit. There is nothing inherently conservative about a 'Department of Natural Resources'.</p> <p>Rename and reorganize those county agencies whose responsibilities include environmental protection.</p> <p>Just one person's view.</p> <p>Thanks.</p> <p>Tom.</p>
266	4/8/2024	Thomas Doty	Comp Plan	Environmental	



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Comment #	Date Received	Name	Category	Subcategories	Text
267	4/8/2024	Judy McDonald	Comp Plan	Environmental, Site Specific	<a href="#">See page 477</a>
					<p>Greetings,</p> <p>My name is Julie Poor and my husband and I have lived in North Kitsap for 24 years and have real concerns about the Raydient Rezone on Hwy 104. We are not NIMBY's, live on Hwy 3 just north of Poulsbo. Listening to Jon Rose through a couple of decades representing various timber companies through name changes and bankruptcies, and now getting the Kingston Rotary involved I really would like to be heard as well as the others who feel we only have one chance to make the right decision on the rezone. The impact on the Counties budget, traffic, the eco system we all love and enjoy should have more weight than one company selling a presently zoned timber parcel. Jon has stated that the simplest thing for them to do is sell the property in its current state to a developer who can divide and build 20 homes, possibly with 20 ADU's. Why don't we just let him do it? Raydient isn't going to do any development or mitigation to our infrastructure. Let them make their money and run. If you allow higher density than the current zoning the issues become compounded by every house allowed.</p> <p>1.These homes will not be low or even middle-income homes after all the infrastructure is developed. They will not be affordable by any stretch of the imagination. There would have to be water, septic or sewer, some sort of traffic light or round about and there is no public transportation of any kind there. If Kitsap Transit provided any it would come at a cost to all of us in higher property taxes. Not to mention the amount anyone developing would have to pay the county and others to do the ground water runoff and put setbacks to protect the creek. Kitsap needs affordable housing right now; the problem gets bigger every day. This particular parcel does not meet the needs of the citizens in our county for housing.</p> <p>2.The Kingston Rotary has not even raised the \$10,000 to study putting in their "Y" complex. How are they going to get millions to build? It will never happen. The Poulsbo recreation site already has funding and is only a short 10 minute drive farther. It is situated near restaurants and shopping so parents can drop kids off and spend their time doing errands. How will kids get to the Raydient property? What will their parents or friends do while they wait for them? The location isn't going to work. There is no way that Kitsap can make Hwy 104 walkable or even bicycle safe in that area. The retail zone they are proposing goes completely against the counties own standards and is the only way to try to pay partially for the Y to be built there.</p> <p>3.The current issues with Raydient's liability in the Port Angeles clean up lead me to believe they will either split the company to keep their assets or declare bankruptcy. I have no idea how that will affect the parcel of land currently under discussion in Kitsap County but it might be worth reviewing also.</p> <p>The council has only one chance to get this issue correct. Raydient has hired a PR firm and held "public meetings" which I have attended. We were not allowed to speak; they hired a Poulsbo Police Officer to watch over us like we were the problem. No one against the proposal was the least bit out of order. But the pro Rotary group was very hostile towards us in their comments, and nothing was done about that. I wish we had the funds to host our own meetings and give the other side to the public, but we don't. Our only hope is that you listen and take into consideration our fears and concerns. Please get this right.</p> <p>Respectively, Juie Poor</p>
268	4/8/2024	Julie Poor	Land Use Reclass (Site Specific)	Raydient Reclassification	
					<p>To Whom It May Concern,</p> <p>I am one of the property owners at 225 Enetai Beach Road and as such I have heard about a Kitsap County comprehensive plan hearing this evening at 5:30 where we can voice our concerns regarding the Fisher development plan. I am OPPOSED to any development of the Fisher Plat. The rezone that happened in 2016 should never have gone through due to the delicate nature of this greenbelt, with the existence of a salmon-bearing creek (Enetai Creek), diverse wildlife, and old-growth trees. I am appalled that this was passed when Enetai was supposed to be rezoned GREENBELT to support the Illahee Wildlife corridor, and I urge you to reconsider this project which will destroy this fragile greenbelt and ecosystem. This was a huge mistake by the county that has now resulted in potential catastrophic environmental loss for developer financial gain. This must be rectified.</p> <p>The proposed Fisher development calls for the building of 200 homes which will generate pollution, traffic, clearcutting, and a substantial increase of human activity. This is not a suitable location for this kind of urban development. Where is the Environmental Impact Study for this development? I request a copy if/when it is available. Certainly NO permits for the Fisher Plat development should be reviewed or issued until an environmental assessment has been completed and reviewed.</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
					Please confirm receipt of this email.
269	4/8/2024	Susan Ingham	Comp Plan	Site Specific, Land Use, Environmental	Thank you,  Susan Ingham
270	4/8/2024	Skokomish Tribe	Land Use Reclass (Site Specific)	Site Specific, Land Use	<a href="#">See pages 478-528</a>
					<p>This is public comment applicable to the 2036 Comprehensive Plan Update for Kitsap County.</p> <p>As per Kitsap County Comprehensive Plan - Development Regulation Revisions - Title 17 Zoning</p> <p>Code Section 17.420.052 and 17.420.060(59) is being revised to increase density for Urban Cluster Zones within the Urban Low Density Residential land use designation. Currently the code calls for 5-9 allowable units per one acre of land. The change being proposed is to increase the density to 9-14 units on one acre of land.</p> <p>Opposed to this Regulation Revision - PRELIMINARY ALTERNATIVE DESCRIPTION: NO ACTION</p> <p>Justification #1: Buildable Lands Report - 2021 August (Draft - not sure why the County has a DRAFT document on their website as a reference document? Additionally, I hope that the "Final" was completed as per E2SSB 5254)</p> <p>•Growth Trends / Assessing buildable lands for growth for residential density. Chart 7.6, page 15. Notes there were no amendments needed during the last Comprehensive Plan Update. Market Conditions were consistent. Keep former assumed density. County will continue to monitor and adjust based on future development activity.</p> <p>•Chapter 5. Kitsap County UGA - Residential - Reasonable Measures: Notes page 83/84, Growth and Capacity. Density: The achieved density of residential permits and plats were within the allowed density ranges in every zone. No reasonable measures are necessary at this time.</p> <p>•In 2018, the Buildable Lands Report, outlines the maximum lot size for an urban cluster zone. It is noted that the County set the lot size to "reduce the number of oversized lots in the zone". Additionally, through resolution, the County noted that urban cluster zones will also encourage "mixed uses - residential with commercial".</p> <p>•Page 18-19, Development Clustering &amp; Master Planning - Reasonable Measures: It is said that clustering is used to increase density meanwhile preserving natural areas or to avoid natural hazards during development. It too works in conjunction with increased density to preserve aesthetics of less dense development and its to preserve the use and characteristics of the site and adjacent uses as a primary consideration in determining building footprints and access.</p> <p>There is no need justified to increase density by increasing the allowable units per acre in an urban cluster zone. The current numbers are in alignment with the facts outlined in the Reasonable Measures Report and in current population estimates for Urban Growth areas Keep the "sprawl" closer to town centers for easy transportation options and resources Keep the numbers of units</p>

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271	4/8/2024	Kathy Meysenberg	Comp Plan	Land Use, Site Specific	<p>per acre as is, to try and minimize risk to natural resources, ecological and Riparian habitats, and to stay in land use relations to the surrounding properties which support historical farming and agricultural practices with limited attention within the GMA and the County Comprehensive Plan. The Central Valley area is one of the last areas of Unincorporated Kitsap that retains its historical farming culture, small town feel, and strong community atmosphere.</p> <p>•Goal 1, Land Use Policy 1.4 - Implement land use designations through a clear regulatory process that ensures transparency fairness, and predictability in the land development process.</p> <p>oThis has not been the case with the rezoning and reclassifying of the Royal Valley Development (as an example). This large development project has been rezoned and reclassified multiple times to increase density after the first project was originally proposed and rezoned for senior housing and the land owner passed. Some of these decisions were latched onto amendments that didn't happen with the Comprehensive Plan Update. If the community knew better about the potential for these types of changes on land use, it would of afforded a better opportunity for community feedback keeping the process transparent. That was not the case. This raises the question of Land Use Goal 4 - Property Rights Policy 4.2 "Property owners are to be protected from arbitrary and capricious land use decisions and actions" who was this goal written for? Property owners to whom are looking to take a land use action, or property owners near a land use action, if it is the latter, the County should be questioning their practices with Royal Valley and Island Lake - what is the true purpose of a rezone.</p> <p>oThe radius of notifications to neighboring properties has been limited in comparison to the size of this project, essentially keeping public notifications to a minimum and public comment at bay. Neighbors have shared being included in the postcard notifications and then sometimes not. Inconsistent. This does not just sit with Planning, but it also crosses over to other City Departments such as Public Works and Street projects. The County needs to do a better job communicating out to the public and involving neighbors to keep processes transparent.</p> <p>oDuring attendance in Royal Valley hearings, project questions were presented by neighbors but were dismissed by not only the developer, the engineering firm, the planner, but also the hearing examiner. I hope this is not something that happens often as the public has the right to be heard, addressed, and answered.</p> <p>oAs per Kitsap County Code 21.04.130 - As this process is "optional", the code should be revised to require projects that meet a certain criteria, to have a neighborhood meeting (a neighborhood meeting is NOT a couple neighbors walking around a project site with a developer). Apparently this was a consideration years back to make neighborhood meetings mandatory, however the County removed the requirement. As public awareness is key and truly addresses Land Use Policy 1.4. No Neighborhood meeting was held during preapplication of Royal Valley, during permitting, nor currently, again, not meeting the Counties transparency policy.</p> <p>•Goal 4, Property Rights 4.2 ( see above bullet 1 to Land Use Policy )</p> <p>Justification #3: Comprehensive Plan Update - Land Use Element ( 2024 KC Comprehensive Plan - 2024 Draft )</p> <p>•Intent is to "...ensure compatibility between adjacent zones" and "ensuring land use decisions have equitable impacts and outcomes"</p> <p>The Royal Valley project is not compatible with adjacent properties, zone, or culture along the northside of the project, nor the east or west. It will have a large impact on ALL the areas surrounding the project during each phase of the project. Increased density in this location is not needed or warranted by the data and statistics provided.</p> <p>It should be taken into consideration as well, that public safety is already pressed and at its breaking point in the entire County. Increased housing and density opens up the potential for more crime and life safety demands. As the comprehensive "plan" writes on goals for affordable housing, jobs, etc. it doesn't do a good job in writing goals and policies on "planning" for life's day to day happenings.</p>
272	4/8/2024	Sandy Pernitz	Draft Development Regulations	Land Use	Please make sure to enhance protections of farm/potential farm land.
273	4/8/2024	Beckie Regusci	Housing Element	Island Lake Reclassification	I oppose the development at Island Lake. I think that the developers are cramming too many homes in an area that cannot accommodate the number of dwellings they are planning. What are their plans to mitigate the preservation of the fish in the lake (setbacks)? How are they going to alter the current roads to accommodate the extra traffic? Where will the children go to school? I assume that they questions have already been asked and answered. I just wanted it to be asked again. I recommend that the developers be required to purchase the land and build the necessary infrastructure and buildings to accommodate all the people they are adding to the area. (I.e. schools, fire department, police etc.) The taxes the homeowners will pay moving forward could sustain the services but the developers should pay all cost associated with the construction of the buildings. Thank you for your time.

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274	4/8/2024	Suquamish Tribe - Rod Malcom	Comp Plan	Comp Plan Edits, Environmental, Land Use	<a href="#">See pages 529-550</a>
275	4/8/2024	Jim Aho	Comp Plan	Land Use, Site Specific	<p>Commission and Commissioners',</p> <p>I have been asked to comment on the proposed 'Fisher Plat' plans for Enetai with respect to what happened in Illahee when a similar high density sewerred development called Timbers Edge was proposed several years ago along the steep banks of Illahee Creek. The community was concerned, but even more so was the Port of Illahee due to the close proximity of the Port facilities to the Creek and the excessive buildup of sediment under the Port floats, measuring nearly 2 feet, with concerns of the need for future dredging.</p> <p>It was obvious that the county stormwater codes were not protecting Illahee Creek and the dock facilities, as the newly installed culvert under Illahee Road was already failing and something more needed to be done. The Public Works engineers suggested a watershed assessment was needed. The Port then hired Aspect Consulting to begin a study of the stream and, based on those results, applied for and received a \$268,000 Department of Ecology 'Centennial Clean Water' grant to expand the study, which verified the Ports concerns and many more issues that the Port and community residents were unaware of, like the critical status of the underlying aquifers.</p> <p>At the same time the Port's Clean Water grant study was completing, the USGS Bainbridge Island Aquifer Study was also completing (whose boundary extended into the Manette Peninsula). Dr Massmann (Keta Waters groundwater consultant) presented his findings, which was attended by the USGS representative, on 6/30/09 at the Norm Dicks Center, where he noted the Manette Peninsula aquifers were at or near water balance (see "Illahsee Watershed Aquifer Protection Plan"). With these two high level ground water studies already completed the 'best available science' regarding aquifers is available and those reports need to be accessed, interpreted and referenced.</p> <p>My recommendation is that the 'Fisher Plat' permit process be put on hold until those studies can be reviewed/verified and/or completed by credentialed aquifer experts.</p> <p>I have also been asked to comment on the commonalities between Illahee and Enetai with regards to the Illahee Community Plan. We share borders, headwater wetlands, similar landforms, connecting waterfronts, of similar size and populations, and both claim Illahee State Park as part of our communities. When the Department of Fish and Wildlife (DFW) conducted a wildlife habitat review of the area they identified 3 major wildlife habitat 'patches', the Illahee Preserve, the State Park, and the Cheney Estates (Enetai Community) with close proximity corridors connecting them. With so many commonalities already existing between the two communities, the consensus is the Illahee Plan could be easily expanded to include Enetai.</p> <p>Please consider using the 'Best Available Science' and the previous Community Plan efforts, when making your decisions.</p> <p>Thank you for the opportunity to comment!</p> <p>Jim Aho, Port of Illahee Commissioner</p>
276	4/8/2024	Amy Lawrence	Comp Plan	Transportation, Infrastructure	<a href="#">See pages 551-586</a>

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Comment #	Date Received	Name	Category	Subcategories	Text
277	4/8/2024	Ron Perkerewicz	Comp Plan	Code, Land Use	<p>I would like to testify regarding section 170490.030 of title 17 regarding parking in single-family dwellings.</p> <p>Currently Kitsap is the only jurisdiction in the state that does not count garage stalls as parking spaces.</p> <p>With the greater concern for personal safety and security we are finding that more and more people, as we do our inspections, are using their garages for parking rather than storage.</p> <p>County staff has repeatedly said that the reason they don’t count the garage as parking is because people are using them for storage. I don’t believe it’s the county’s position or given authority to dictate how we use the space within our homes. I may want to use my bedroom as an office, as a media room or any other use.</p> <p>In addition to the increase use of garage’s because of personal safety, the reduction in setbacks, the more liberal use of ADU’s and the increase in car thefts and vandalism it would only seem logical that people will be using the garage’s for motor vehicle storage.</p> <p>I would like to see the county amend title 17 to allow as many parking stalls as there are garage stalls to be counted. The state legislature this year had several bills (HB1351/SB5456) that received significant action and even committee approval but were not finalized before the session ended that modified parking requirements and allowed for tandem parking and miscellaneous other items.</p> <p>There was significant testimony as to the amount of land that was used for parking that could be used for the construction of housing.</p> <p>Please consider the minor amendment of taking out the limit of one parking stall in a garage to be counted towards the number of required parking spaces and allow all garage and carport spaces to be counted.</p>
278	4/8/2024	WDFW - Jessica Bryant	Comp Plan	Land Use, Environmental, Transportation	<p><a href="#">See pages 587-590</a></p>
279	4/8/2024	David Gravenkemper	Comp Plan	Land Use, Site Specific	<p>Dear County Commissioners,</p> <p>I have heard about a Kitsap County comprehensive plan hearing this evening at 5:30 where we can voice our concerns regarding the Fischer development plan. I would like to submit the following comments:</p> <p>I am part of a property ownership group at 2256 Enetai Beach Road. Currently this community has about 25 homes which are accessed by mostly dirt roads. The area has been kept pristine and is home to diverse wildlife such as bald eagles, blue heron, deer, and owls. It is close to a salmon bearing creek (Enetai Creek) and contains old growth forest.</p> <p>The proposed Fischer development calls for the building of 200 homes which will generate pollution, traffic, and a substantial increase of human activity which will severely impact this fragile ecosystem. This is not a suitable location for this kind of urban development. Has there been an environmental impact study? If so I would like to see a copy.</p> <p>I am requesting that the county deny all permit requests for the Fischer property development.</p> <p>Please reply to this email for confirmation of receipt.</p> <p>Thanks, David Gravenkemper</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
280	4/8/2024	Charles Warren	Comp Plan	Site Specific, Infrastructure, Environmental	<p>Dear County Commissioners,</p> <p>I am writing to you today regarding the proposed expansion of the sewer system in the Rozewood neighborhood and the massive development that will be proposed to leverage that expansion next to the Enetai neighborhood. I am asking you to immediately freeze permit applications in this area until the zoning and planning can be properly considered.</p> <p>The Kitsap County comprehensive plan did not contemplate the impacts of sudden introduction of hundreds of units of housing into a critical upland shoreline area, containing significant forest habitat for eagles, deer, dozens of bird species, and native old and medium growth forest. This area is one of the last green buffers of non-development along the shoreline bluffs between Enetai and Illahee.</p> <p>As a long-time resident, multi-generational, who has weathered such issues as the damaged shoreline from the old high-speed ferries and seen hundreds of metric tons of waste discharged accidentally by the shipyard, I am deeply concerned about the impacts of the expected massive development in a wildlife corridor on the residents and the quality of life for everyone. I am not opposed to development but it should be properly planned and fit the larger overall desires of the citizens of Kitsap County.</p> <p>I implore you to please listen to the residents and their concerns. My family has been responsible stewards of the land and environment of Enetai Beach for well over a century and we know that managing for the long-term is different than cashing out for a quick buck. A moratorium on development to allow for proper planning is essential.</p> <p>Thank-you for your consideration.</p> <p>Charles Warren</p>
281	4/8/2024	Sarah Lofthus	Comp Plan	Land Use	<p>Hello,</p> <p>I wanted to send a note in favor of alternative 2 (compact growth).</p> <p>Thanks!</p> <p>Sarah</p>
282	4/8/2024	Kitsap Conservation District - Diane Fish	Comp Plan	Land Use, Environmental, economic Development	<p><a href="#">See page 592</a></p>
					<p>Good afternoon, my name is Gregory Dawson, and I am a lifelong resident of Kitsap County, and live in District 3 represented by Commissioner Walters. I am currently retired after 45 years working in Human Services as a Licensed Social Worker. I continue to volunteer my time in the community and serve on a local municipal commission.</p> <p>Thank you, Commissioners, for the opportunity to provide my feedback about the Kitsap County Comprehensive Plan, specifically about transportation, an issue that is extremely important to our quality of life.</p> <p>The Kitsap County Comprehensive Plan includes a goal of creating a “contiguous non-motorized transportation system which integrates on and off-road facilities”. This is specifically a point, and the safety of which, that is of keen interest to me, and I believe, the future for our county.</p> <p>Currently, I feel that there are only a few isolated pathways that can be safely shared by pedestrians, bicyclists, and other nonmotorized transportation users. Most of the best pathways simply do not connect and can be dangerous for children and wheelchair users attempting to traverse between pathways.</p> <p>How do we improve safety for cyclists, pedestrians, and other non-motorized transportation users?</p>

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283	4/8/2024	Gregory Dawson	Comp Plan	Transportation, Infrastructure	<p>•Adopt WSDOT’s precise definition of bike facilities, so we can all be using a common language and terminology to discuss project planning.</p> <p>•As is commonly done by specialized engineering firms for aspects of motorized transportation projects, I encourage contracting with an engineering firm specializing in bike pedestrian improvements to create the next Kitsap County Non-Motorized Plan.</p> <p>•Prioritize feasible non-motorized improvements on the County’s numbered bike routes, specifically those connecting Pierce County to the Hood Canal Bridge. This would create geographic equity and complement North Kitsap’s planned East-West STO path.</p> <p>•Prioritize funding the Jarstad Park to Kitsap Lake paved shared use path as a safe alternative to pedestrians and non-motorized vehicles traversing Gorst.</p> <p>•Re-define the TIPS process: Separate resources into road improvements, on-road bicycle and pedestrian safety improvements, and off-road paved shared use paths.</p> <p>Improvement of the safety of our transportation system to include pedestrians, cyclists, and individuals who use wheelchairs and not just for the sake of automobiles, is paramount to obtaining a future of greater livability for all citizens. Great public works are built to inspire, rather than just meeting some element of functionality. Lasting public works are built not for today alone, but for the use and enjoyment of the children of the future.</p> <p>Thank you for your consideration and wise governance. I hope you will join me in supporting these suggestions and the citizens of that bright future.</p> <p>Sincerely,</p> <p>Gregory Dawson</p>
284	4/8/2024	Dianne Iverson	Comp Plan	Transportation, Infrastructure	<p>Commissioners,</p> <p>Tonight I attended the hearing on the comprehensive plan for Kitsap County. I focused my testimony on how to make our streets safer for bikes and pedestrians.</p> <p>I want to make it very clear that I strongly support the Sound to Olympics Trail and the North Kitsap connector to that trail as well as safer streets for pedestrians and cyclists in central and southern part of the county. As a person who rides a bike and is also disabled, I believe the Sound To Olympics Trail is the best asset in non-motorized facilities this county has ever seen. The community leadership and the elected officials that helped make the RAISE grant a reality have my utmost respect. Thank you for your leadership. Continue to support paved trails for all ages and abilities.</p> <p>People who are disabled have a right to enjoy our parks with their friends, their families, and their children. The paved trail from Kingston ferry terminal through North Kitsap Heritage Park and Port Gamble is of utmost importance to me. It should be prioritized for grant funding.</p> <p>My testimony tonight on the comp plan was about making safer on-road bike and pedestrian connections from south to north so that we do not have to drive our car to use the future Sound to Olympics Trail. The central and southern parts of the county need to have a plan for improving the safety of our roads for cyclists and building the 3.1 mile Jarstad Park to Kitsap Lake Trail. A long range plan to design a paved trail from Gig Harbor to Poulsbo should begin the process now so that our great grandchildren will be able to enjoy it when it is finally complete. I am not in support of pitting the paved trails through our parks against the on road facilities. They both need to happen. The on-road facilities can be done in a less expensive way, but creative problem solving around the issue must occur. I love the idea of flex space for bikes and pedestrians such as what is designated on West Kingston Road and Southworth between Harper the pier and the park.</p> <p>Dianne Iverson</p> <p>Thank you for being such good listeners tonight. Dianne Iverson. Bremerton, Washington West Sound Cycling Club and Leafline Trails Coalition.</p>



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Comment #	Date Received	Name	Category	Subcategories	Text
285	4/9/2024	Raydient - Jon Rose	Comp Plan	Land Use, Site Specific	<p>Folks,</p> <p>Please consider the enclosed letter outlining our request for inclusion in the Kingston UGA with special attention to the suggested conditions regarding inclusion of affordable housing.</p> <p>I believe these affordable housing provisions would be appropriate for almost any property moving from rural to urban.</p> <p>Sincerely,</p> <p>Jon Rose</p> <p><a href="#">See attachment on pages 593-594</a></p>
286	4/9/2024	Lisa Pederson	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Greetings Commissioners: David Pedersen, my husband, will be attending tonight's Public Meeting and Public Hearing but I will not be. Since I won't be in attendance, I would like to request in this email that if you have the time please view each of North Kitsap United's videos filmed by Solefire Film's on YouTube before making your decision on the Final Alternative for land use. In each of these presentations, Mr. Jon Rose states that if the community does not want the rezone, the sports complex or sports fields, Raydient/Rayonier will back out of this. He even mentions in one of the meetings, he would like Poulsbo's backing. As I read through the Comprehensive Plan Comment Matrix found on the County's Comprehensive Plan Update page, there is a clear opposition to the rezoning and sports complex since it will add to urban sprawl and have negative impacts to our rural character and environment. The GMA and Puget Sound Regional Council 2050 specifically state the protection of rural lands not to allow urban sprawl in rural areas. Plus, both Tribes and the City of Poulsbo have sent in letters of opposition, and, NKU has not been able to come up with needed donations to show support. In looking at what the Planning Commission is recommending in the Public Hearing tonight, it appears they recommend that the rural zones not be changed in the Comp Plan 2024 Update, but recommend all rural reclassification requests be referred to a 2025+ planning process. I don't see a reason the Planning Commission gives for extending the time period for the reclassification requests and no matter how long the requests are extended, the public's mind will not change. The consensus I see after reading the comments in the Comprehensive Plan Matrix and the Port Gamble Forest Heritage Park comment matrix, the opposition letters from Poulsbo and the Tribes is the community does not want the Raydient/Rayonier rezone and sports complex to happen. In reading NKU's White Paper, NKU's vision includes a restaurant and small strip-mall, and possibly a theater added to the YMCA, sports complex and at least 80 home residential area. How would this development not contribute to urban sprawl and not adversely affect our rural environment? It would forever change the rural character and pattern and negatively impact our aquifer, salmon and streams, and add to an already very congested state highway. I respectfully request you consider all of these items before making your decision in regards to these reclassifications. The extending of the reclassifications will only benefit the developers in reaping a financial reward while our beloved environment is destroyed forever. Thank you for making this statement a part of the Public Hearing tonight, April 8, 2024. Sincerely, Lisa Pedersen</p>
287	4/9/2024	Rob Salthouse	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Regarding the “Raydient rezone”.</p> <p>What is the value of allowing the rezone to the citizens of Kitsap County?</p> <p>Alternative Two already increases the housing density for Kingston beyond the future growth projections. Unfortunately, as you are aware, with the Arborwood development it is overweighted with expensive single family homes.</p> <p>Putting more single family homes (and a sports complex?) on Bond Road will only add to the residents tax burden with necessary road improvements and infrastructure costs.</p> <p>The Raydient proposal does not address the need for affordable housing.</p> <p>Allowing Raydient to add more expensive, single family homes only provides value (profit) for Raydient - a Florida corporation with 25% foreign ownership - and will not address Kitsap County’s needs in any way.</p> <p>Rob Salthouse</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
288	4/9/2024	Beth Anderson	Comp Plan	Transportation, Infrastructure	<p>I am Beth Anderson, resident of Commissioner Katie Walters District.</p> <p>I have lived and worked in Kitsap County for most of my life. For over 30 years, I commuted by bicycle to my job with the Navy.</p> <p>I am in favor of several of the revised Comprehensive Plan goals including:</p> <ul style="list-style-type: none"><li>•Increased emphasis on public health, equity, safety, and climate change; and</li><li>•Improved planning for active transportation (bicycles and pedestrians), including policies to support the development of new methodologies to analyze the level of service for multiple modes of transportation, not just cars</li></ul> <p>The comprehensive plan, however, lacks details on how these goals will be accomplished. For example, the plan’s projects proposed for Chico Way are vague and confusing. Chico Way is a vital connection for cyclists traveling between Bremerton and Silverdale, it is a good route for recreational cyclists, runners, and walkers, and is part of bike route #3. I have used Chico Way for cycling, walking, and running. While my sons were in Boy Scouts, I led a group of scouts through the cycling merit badge. I used Chico Way to introduce the boys to cycling as there are not too many roads in Kitsap County that are flat enough for beginning cyclists. Some of the boys in the Boy Scout troop had never before had the opportunity to ride a bike. Their excitement and joy in getting to ride a bike was amazing. It would be wonderful if Chico way could be made safer for beginner cyclists.</p> <p>The comp plan lists three different improvement projects for Chico way: #95, #233, and #236, but provides insufficient detail for me to give valuable feedback. Project #95 states it is 1.5 miles long, and includes “access management, sidewalks, multimodal path, center curb, and roundabout.” I am not sure what access management means and it is difficult to tell where the 1.5 miles starts and ends. It is unclear if all of these things would be provided for the entire distance - which is unlikely.</p> <p>Multimodal and shared use paths are not on-road facilities. Where would you put one and why, when the paved shoulder is sufficient to provide buffered bike lanes for little cost? I would urge improvement of the shoulder along the entire length of Chico Way which is almost 5 miles long from the Bremerton city limits to the roundabout south of Silverdale. Chico Way can be made safer by adding actual bike facilities. There may not be sufficient space for both sidewalks and bike facilities, but adding a car free and well marked bike/pedestrian way will also provide a safer space for pedestrians. The County provided a combined bike and pedestrian shoulder on SE Southworth Drive many years ago, a solution that would work well for Chico Way. Additionally, adding a bike and pedestrian link between Jackson Park and Sherwood drive would provide yet another safe connection to Chico Way from Bremerton and add to the benefit of improving safety on Chico Way.</p> <p>We need more safe routes for children to learn to cycle. It is great exercise and a lot of fun which motivates both kids and adults to get outdoors. Kitsap County is beautiful, and it would be wonderful to have more safe routes to enjoy it.</p> <p>Beth Anderson Resident of Commissioner Walter's district</p>

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289	4/9/2024	Beth Nichols	Comp Plan	Land Use, Site Specific	<p>Comprehensive Plan Comments April 8 hearing</p> <p>Kitsap County is at a turning point. We ask that you, our Commissioners- act carefully with thought for the future, for the uncertainties of climate change and the stewarding of our precious natural resources and wildlife. We don't want expanding suburban sprawl that destroys what is most valuable here.</p> <p>Alternative 2 appears to be the best choice for meeting growth while protecting rural areas, and gives us the best chance for development that protects the environment that we all depend on. However, Alternative 2 cannot have loopholes, there needs to be strong guardrails and programs that deliver the targeted outcome we want- growth concentrated in urban areas and preservation of rural areas and natural resources.</p> <p>Too much unwise development has already happened in the County, and there is development in the pipeline that we will be seeing unfold in the coming years, such as the Arborwood development and Port Gamble Redevelopment in North Kitsap.</p> <p>We need to stop and hold fast to what we have left, to achieve a meaningful growth plan that balances the need for affordable and middle-income housing with care for remaining natural resources.</p> <p>No further Limited Areas of More Intensive Rural Development should be added.</p> <p>Rural rezone requests such as the Island Lake development in Central Kitsap, and the Bond Road Raydient request in North Kitsap are not compatible with the goals for careful growth targeted to urban growth areas, and for protection of rural qualities and natural resources. Both of these rezones would continue down the road of destructive development that destroys needed natural areas and does not concentrate growth in already impacted designated urban growth areas. Please deny these rezones and others like them. We need to do better and chart a smarter course.</p> <p>We are counting on you, Commissioners, to safeguard the qualities that make Kitsap County special, while balancing for growth. Thank you.</p> <p>Beth Nichols Indianola</p>
290	4/9/2024	Luke Yoder	Comp Plan	Transportation, Infrastructure, Environmental	<p>Hi,</p> <p>My name is Luke Yoder and I live northeast of Poulsbo, several miles from the nearest bus stop. We have two kids and love to spend time outdoors in the Kitsap County parks. I bike commute around the county and to the ferries (either the Fast Ferry from Kingston or WSF from Bainbridge) for work in Seattle. I regularly get honked at while biking home up steep hills with no shoulder like on Gunderson or Columbia, but there are no other ways to get to my house.</p> <p>I am writing in support of Alternative 2 that focuses on compact growth in Kitsap County. We need to control sprawl in Kitsap County in order to preserve both wild spaces, recreational spaces, and farmland. We need to focus on providing affordable housing so that people can afford to live close to work. We need a transportation plan that focuses on public transportation and shared-use paths and bike lanes, so that families like mine can choose to travel safely in ways other than driving. We need to prioritize ecosystem health by maintaining open space and park lands for the health of all county residents, including wildlife.</p> <p>Thank you, Luke Yoder</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
291	4/9/2024	Felicienne Griffin	Comp Plan	Land Use, Site Specific, Housing, Environmental	<p>I am writing to ask that the areas of Rozewood estates be down zoned to UR and the Fisher Plat be down zoned to greenbelt. The 2016 comp plan had this as an option and from what I can tell, none of the alternatives were selected. How is this possible? I live on an UR parcel and there are studies to put 300+ multi family homes on my single family 4 acre property line. This does not seem to match the "like construction" when looking at development.</p> <p>Let me point out the Vision 2050; The plan includes a Regional Growth Strategy that focuses growth in centers and near transit, with the goal of sustaining and creating different types of urban communities, while preserving the region’s working resource lands and open spaces. It directs PSRC to work with others to conserve, restore, and steward the region’s open space and natural environment. It states the region will protect natural areas and enhance the tree canopy. It guides growth that reduces development pressures that threaten farms, forests, and natural areas.</p> <p>VISION 2050 supports the work of the Puget Sound Partnership to promote a coordinated approach to watershed planning and restoring Puget Sound. Key strategies for helping Puget Sound include protecting open space and restoring urban lands through redevelopment and public investment.</p> <p>There is nothing about this proposed development that is low impact, will be a steward of the environment or retain tree canopies. It will pollute a salmon creek, cause further landslides, and displace wildlife and fungi, some endangered.</p> <p>The goals of this document is to protect and restore natural resources that sequester and store carbon such as forests, farmland, wetlands, estuaries, and urban tree canopy. It also works to protect and enhance significant open spaces, natural resources, and critical areas. If you look at any county or state map you will see that this proposed area of development is exactly why you should care.</p> <p>Per the regional open space network, we are in a parks gap (orange priority 4 and surrounded by 3). This area hosts walking trails, promotes biking, and helps the surrounding community stay cool in the summer, protecting us from storms, recharges our groundwater and protects endangered wildlife.</p> <p>The whole Fisher parcel is marked as Farmland of statewide importance. The only thing better than that is the areas that would be contaminated by runoff which are marked “all areas are prime farmland”. This land should be protected at all costs and not subjected to a developer who spends most of their time in London.</p> <p>Furthermore, in WA State Department of Commerce guidance, the quality of groundwater in an aquifer is inextricably linked to its recharge area. Where aquifers and their recharge areas have been studied, counties and cities should use this information as the basis for classifying and designating critical aquifer recharge areas. This area is marked as a Critical recharge 1, very important for our safe, clean drinking water.</p> <p>The engineer said the plot has wetlands, Commerce states Counties and cities are encouraged to make their actions consistent with the intent and goals of “protection of wetlands," per executive orders.</p> <p>Again, cooperative and coordinated land use planning is critically important among counties and cities in a region for preserving fish and wildlife habitat conservation is the management of land for maintaining species in suitable habitats within their natural geographic distribution so that isolated subpopulations are not created.</p> <p>Thank you, Felicienne and Jesse Homeowners on Rozewood</p>
292	4/9/2024	KEC	Comp Plan	Land Use, Environmental	<a href="#">See page 595</a>

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Comment #	Date Received	Name	Category	Subcategories	Text
293	4/10/2024	Autumn Wagner	Comp Plan	Land Use, Environmental	<p>Hello,</p> <p>I am relatively new to Kitsap county and was pleased to watch the recorded hearing on the comprehensive plan. I am in favor of the recommended Alternative 2 which aims to promote growth of housing in urban areas rather than further develop farmland and natural settings. There are always needed exceptions, and I trust our planners to weigh all relevant input and make solid decisions based on decision factors.</p> <p>I do think it is important to have some places for industrial use, but they probably don’t belong along the waterfront unless they are serving waterfront uses. Additionally, all planning should anticipate inevitable climate change and sea level rise.</p> <p>Thanks to the unsung civil servant heroes who do our planning work and inevitably are criticized for trying to balance competing priorities.</p> <p>Best,</p> <p>Autumn Wagner</p>
294	4/10/2024	Donna Hart	Economic Development Element	Economic Development	<p>In a mere 6 years, we will face two major demographic changes in the United States. In 2030, the last members of the Baby Boomer generation, born between 1946 and 1964 (and one of the largest demographic cohorts in our nation’s history), will turn 65 years of age. The Boomers are living longer than any generations before them. A higher percentage than ever before are living into their 80s and 90s. Also in 2030, for the first time in U.S. history, we will have more citizens over 65 years of age than children under the age of 18. Source : U.S. Census Bureau, 2018 at <a href="https://www.census.gov/newsroom/press-releases/2018/cb18-41-population-projections.html">https://www.census.gov/newsroom/press-releases/2018/cb18-41-population-projections.html</a> Title: Older People Projected to Outnumber Children for First Time in U.S. History</p> <p>Seniors should be addressed in this area as they usually have the buying power that helps fuel the economy of the area. Realize that many seniors now will not be here by 2044 but many 40 somethings will be taking their place by then so the need to include and plan for seniors is on-going.</p>
295	4/10/2024	Donna Hart	Land Use Element	Land Use, Infrastructure, Transportation	<p>I agree with many of the comments about the urban land boundary, It might need to be expanded. I also do not agree with the person who wanted to keep their septic instead of hooking up to sewer, however, if it was rural area and not by a waterway then septic might suffice. I also agree with the moratorium till 2025 and stop clear cutting of land for development. I think there should be a rule that affordable housing needs to be a certain percentage of all new housing developments. There also needs to be provisions to work with the state on the ferry system. It's in a bad state right now and needs to be revitalized or we won't have to worry about growth in Kitsap County.</p>
					<p>Commissioners Rolfes, Walters and Garrido,</p> <p>I’m writing in support of the PROS plan for Kitsap County Parks, in favor of protecting habitat in our Heritage Parks, and improving access for people of all abilities in our Heritage Parks.</p> <p>I am a long time Kitsap resident. I am a Port Gamble Forest Heritage Park steward and a board member of Kitsap Audubon, but I this email reflects my personal views. I was part of the Coalition that worked for many years to build support for acquiring parcels for the NK Heritage Park and Port Gamble Forest Heritage Park, for protecting Grover’s Creek in conservancy status with Great Peninsula Conservancy. The Kitsap Forest and Bay Coalition was successful because so many groups, the property owner and individuals worked together to save the lands, with the vision of restoring former commercial timberlands to healthy habitat for the public to enjoy, whether walking, riding or wheeling.</p>

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296	4/10/2024	Judy Willot	Comp Plan	Transportation	<p>The PROS plan, along with the Framework for Port Gamble Forest Heritage Park builds on maintaining that balance between public access to a public park and both restoring and protecting habitat.</p> <p>The North Sound to Olympics study has recommended a route for the trail from downtown Kingston to the STO Port Gamble Trail at Stottlemeyer Road. Supporting this trail, which will draw from different funding sources from road edge bike lanes, will be only one part of a network of non motorized travel options for Kitsap folks to enjoy.</p> <p>Port Gamble park in particular is almost 3,500 acres. There should be room in all that land for habitat and for people. When there are issues of trails conflicting with habitat needs the park stewards and the County Park Staff have the knowledge base to negotiate those issues, maintaining habitat while still ensuring public access. The Framework and goals in the PROS plan provide guidance in solving such problems.</p> <p>Sincerely, Judy Willott</p>
297	4/10/2024	Beth Berglund	Comp Plan	Environmental	<p>1. The Parks and Environment sections both allude to the same lands but use different and undefined terms. This makes it confusing for the reader to understand the boundaries between the heritage parks' recreational interests and the open space's ecological protection interests.</p> <p>oWhat is the mission / vision for our heritage parks and for our open spaces? oWhere are they aligned and where do they conflict? oWhere does it express how we balance both interests? dHow will we prevent our Heritage parks from being "loved to death"?</p> <p>2. Page 118: heritage parks, waterways and waterfront parks, community recreation complexes, legacy parks, special use parks, and open spaces and greenbelts. What distinguishes each? Shouldn't each be defined in the comp plan? e.g., Kitsap County's Heritage Parks are large forested areas with established woodland trails and natural features including streams and ponds. Many of these parks were in timber production and are being transitioned into ecologically diverse and valuable conservation, open space, and recreation areas. Ecological restoration is part of this transition.</p> <p>3. In the context of heritage parks, I recommend buffer zones and other policies be established that restrict adjacent uses that are loud, polluting, detrimental to wildlife, and/or that degrade the nature-focused experience our heritage parks should provide to both human and non-human animals.</p> <p>4. Where in this Comp Plan do we reflect that we value protection and restoration of lowland streams, marshes, estuaries, and diverse and healthy forest ecosystems because we recognize they provide critical ecological services? Are those values only addressed in the CAO?</p> <p>5. The NKU sports complex project is a direct reflection of Kitsap County's and North Kitsap School District's failure to maintain and improve our existing sport fields. Fortunately, it's not too late. Kitsap County should work with the NKU team to identify the needs of the fields at Buck Lake and Kola Kole — both of which were rated two out of five (by the NKU team) and are considered by them to be unusable as either practice or game fields. I can attest that Kola Kole in Kingston is being used almost exclusively as a dog park. The county parks department should explore opportunities to partner with organizations like Rotary and others to fundraise and/or support levies/bonds. Fields that have been shown to be impractical to upgrade should be re-evaluated for meeting other community priorities.</p> <p>Thank you, Beth Berglund</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
298	4/10/2024	Kelly Roberts	Comp Plan	Land Use	<p>Re: Request(s) for rural rezoning, in general, and Raydient land</p> <p>I have been a homeowner in North Kitsap for over 5 years and a resident of Kitsap County for nearly 9 years. Apparently, community residents were invited by Raydient to attend an informational meeting last summer to learn about a proposed sports and recreation complex. Well, I’m not sure who exactly was invited because I was not. After hearing grumblings amongst people in the community, I wanted to learn about the discontent, so I attended a public meeting later in the year. When the presenters shared their ideas for how they want to use the rezoned land, they were adamant that “it’s what the people want and need” and "they know that because they talked with them”...whoever they are and however many there are of them. ??? As I mentioned, I was not invited to any discussion and clearly was not asked about my needs as a North Kitsap community member, so I will share them now.</p> <p>I moved to Kitsap county nearly 9 years ago. After 40 years, I happily left a metropolitan area (currently populated at 4.9 million) that was/is full of development like what is being proposed. I was intentional about North Kitsap primarily for its rurality that provides myself and many others the refuge from life and career stressors, quiet, darker surroundings, natural habitats that include various waterways, trails, animal and plant wildlife...less cars, less venues, events and commotion, less commercial and industrial construction, etc. These are quality of life issues, and those are my needs.</p> <p>Our county seems to already have pockets of overdevelopment. From my experiences and observations of the place I left for a better quality of life here, a little development here and a little development there always creates a trickle effect. “Keeping the rural places rural” has been ringing all around the community and with good reason - we need rural places! Degrading the natural habitats, changing sensitive ecosystems, and stripping away the picturesque characteristics of rural areas is not conducive to the peaceful existence that people want in rural areas. The relationship between people and nature is symbiotic and needs to be conserved, not desecrated, and especially not for what is and has already been made available to the community. Living in rural areas, in North Kitsap specifically, is a choice we residents have all made for the very reasons I mentioned above, whether one is new to this area or has been living here for decades throughout family generations.</p> <p>A rural rezoning request only translates to a mushrooming effect of:</p> <p>congestion - worse than what is already a reality, even on a Sunday morning!</p> <p>generation of compound waste - household (to include biological sewage sludge, hazardous cleaning supplies, et al), medical waste, gas and oil waste from various machines, etc...it all goes into the ground</p> <p>exertion on the energy grid - more lights = more light pollution</p> <p>water usage</p> <p>I ask that you please NOT grant any requests for rural rezoning but instead protect our rural areas from exploitation.</p> <p>I also ask that you approve the adoption of the Alternative 2 plan.</p>



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Comment #	Date Received	Name	Category	Subcategories	Text
299	4/10/2024	Beth Nichols	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>I wanted to support the recommendation by the Planning commission to NOT allow the rezone request for two parcels “Owned” by Jon Rose for Olympic Property Group. Parcels are 022602-1-035-2009 and 022602-1-036-2008. Rezone request #70. These two parcels on South Kingston are currently Rural residential and Applicant Jon Rose’s request was to rezone them to Urban low density residential. I support the recommendation to keep them at RR. They border the massive Arborwood housing development that will be impacting the area with loss of tree canopy, habitat loss, degradation of the Apple Tree Cove watershed, traffic congestion, and densely increased population. Adding more single-family housing on the edge of this development would only worsen all of these negative impacts to our community and would not help the targets for missing middle housing.</p> <p>It is wise to keep these two 5 acre lots as Rural Residential and keep the current border of the UGA of Kingston. Please support the recommendation to deny this rezone.</p> <p>Thank you, Beth Nichols Indianola</p>
300	4/10/2024	Lynn Schorn	Comp Plan	Transportation	<p>Hello, I just want to first of all Thank you for such an amazing reach out for community engagement!</p> <p>I am and have been working since 2007 on the Sound to Olympics multi-user pathways to connect Bainbridge Island Ferry to the Hood Canal Bridge and Kingston Ferry to the Hoid Canal Bridge. This multi-year/decade project is meant to encourage alternate, safe corridors for travel outside of the automobile. Please consider not only a vision for the future to assist in our community's greater health, but a way to connect Kitsap County to the rest of the state and nation as part of the Rails to Trails program.</p> <p>As a Physical Therapist for 42 years a pathway: (paved or crushed stone) is the only avenue that many of my clients can access Nature, which is essential for human health, via walker, wheel chair, stroller, bicycles. A multi-user pathway provides a smooth surface to support so many physical challenges, as well as, creates a linear park for recreation as well as transportation.</p> <p>It is imperative that we consider a vision for the future of less cars and more options for transit/transportation options(bus service, multi-user pathways) in Kitsap County to lessen our human environmental impact.</p> <p>Thank you for your consideration!</p> <p>Lynn Schorn</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
301	4/11/2024	Anthony Augello	Land Use Reclass (Site Specific)	Land Use, Site Specific	<p>Enetai is wrongly slated for overdevelopment and the zoning was changed in a very questionable manner. Please request an IMMEDIATE moratorium on the permit application (parcels: 072402-2-104-2000, 072402-2-106-2008, 072402-2-107-2007, 072402-2-108-2006, 072402-2-105-2009, 072402-2-105-2108) until County Commissioners consider the following:</p> <p>1) Rozewood Estates area-wide rezone request. 2) Amend the Illahee Community plan 3) Obtain and evaluate Aquifer study of the Manette Peninsula based on best available science prior to future development. The study needs to be performed by credentialed aquifer experts.</p> <p>I have been attending these meetings now on a regular basis since returning to Port Orchard after being gone for more than a decade. Wow, how the county has steadily deteriorated in so many ways. Aside from the rampant crime with minimal (if any) penalties for criminals, abundant pollution, anarchy on the roadways, and negligible law enforcement, the mushrooming of the oversupplied new apartment complexes and the Kitsap County’s push for irresponsible increased apartment development is painfully evident. Furthermore, the promotion to multiply the increase by four times more when there is no apparent true demand is pure lunacy. When county officials have to try to sell residents the idea of multiplying apartments to purposefully try and draw in even more population, it’s an obvious backwards concept in itself and it is putting the cart before the horse. It goes against all common sense regarding simple supply and demand Economics 101. It is also an insult to the Kitsap County taxpayers, and is an obvious recipe for disaster. Kitsap County cannot even find people to apply for their steady paying county jobs (they’ve been vacant for months), yet we’re expected to accept the idea of accelerating the supply of homes even more than what has already been done?? Kitsap County leaders need to stop catering to developers for quick money and simply to please higherup(s), and instead notify the governor how our county is suffering from not following the Growth Management Act (GMA). Kitsap County has already lost an abundance of wildlife and substantial old tree growth from bending rules and regulations. The wildlife and substantial natural beauty of Kitsap County are qualities that have made Kitsap County unique and renowned, and why residents have relocated and settled here in the first place.</p> <p>Eric Baker presents this as a Comprehensive Growth Plan. It’s not. It’s a Comprehensive Plan. There are alternatives that he can be stressing just like SEPA to protect the wildlife and environment as the GMA dictates, and Enetai is a perfect example. Also, parts of Enetai should be preserved for valid historic preservation reasons.</p> <p>Kitsap County has been labeled “The Natural Side of the Puget Sound” by the Visit Kitsap.com website and is the coined phrase for tourism. Why are you allowing Kitsap County to be destroyed rather than protecting it? Do the current Kitsap County leaders really want this to be their legacy? A couple of times recently, I’ve heard the term mission creep brought up, including by a Bremerton resident who called into a Bremerton meeting via Zoom not too long ago. I couldn’t think of a better term. Mission creep is a gradual shift in objectives during the course of a plan, which ultimately ends up as an unplanned commitment. We as residents are busy in our lives including with family commitments and jobs, and it’s during periods such as this where mission creep for developers and those accommodating them pass plans without the people’s knowledge. I know I’m hardly alone in my witnessing of how much Kitsap County has deteriorated since 2010, and it will continue to do so unless we have leaders who are willing to step up to the plate and do what they are supposed to do; represent the actual constituents of the county. I’ve lived in other areas across the country from coast to coast and in between and watched other beautiful areas be destroyed. Hopefully, the deterioration will come to a halt here before it’s too late.</p> <p>Regards, Anthony Augello</p>
302	4/11/2024	Cathy Pevovar	Comp Plan	Land Use, Infrastructure	<p>Hello,</p> <p>Since I was unable to attend the meeting, I do have a question Is there any further discussion on making Silverdale a city? I really feel that we need our own police department. The growth in this area is phenomenal. The sheriffs department is stretched as it is. It seems another layer of protection is worth considering.</p> <p>I appreciate that this was another avenue to have my voice heard. Thank you for that.</p> <p>Respectfully, Catherine Pevovar</p>
303	4/11/2024	Kathleen Sole	Comp Plan	Land Use	<p><a href="#">See pages 596-599</a></p>

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Comment #	Date Received	Name	Category	Subcategories	Text
304	4/11/2024	Veronica	Comp Plan	Infrastructure, Housing	<p>Hello,</p> <p>I am concerned that Silverdale has not become its own city due to the immense growth expected for the area. I also want to point that the infrastructure is pretty weak considering the expansion of the county. We need better medical facilities ie a larger hospital, more specialized medical clinics as well as more mental health counselors and ABA therapists. For a growing county we fall behind in bringing these services up to date to handle the growth. Our roads are poorly designed to handle traffic in silverdale and the traffic on Ridgetop. The one lane roads in each direction on Ridgetop hinder the ability to access the residential areas especially if there is an evacuation order or emergency.</p> <p>The affordability of housing makes it difficult for average income families to afford living conditions in kitsap county especially since the resources are not competitive with other areas on the other side of the water. We need more than residential buildings. We need a community that can provide the needs of a county that is exploding with growth. I think there needs to be an unbiased study of what this county can support now and in the future.</p> <p>Thank you</p>
305	4/11/2024	Eileen Sorg	Comp Plan	Infrastfructure, Environmental	<p>Hello,</p> <p>I just wanted to share my thoughts on the Comp Plan as a lifelong resident in North Kitsap.</p> <p>First, I am grateful that it appears that you are leaning towards Option 2 as that was my and my household members' choice as well. It is important to us that rural spaces stay rural, and that concentrated growth happens in the UGA where resources such as transportation, ect already exist.</p> <p>I own an 11-acre farm in Kingston and feel that agricultural interests need to be emphasized and considered when making decisions about planned growth within the community. We are vehemently against rural rezones for the sake of housing developments outside of the UGA. Aquifer recharge areas need to be protected and as I stated above, my farm depends on it. I am on a well and water for my livestock and crops are very important. It worries me to think that uncontrolled growth by large landholders such as Rayonier could eventually create a scenario where my (and others) wells dropped, requiring the expense and time of drilling deeper in the hopes of accessing dependable water.</p> <p>I also would like to state that we are against the proposed STO running through the Heritage Parks. Not only is that an environmental calamity in the making it also seems to me to be a ridiculous waste of money. People go to the Heritage Parks to get away from pavement. I myself have ridden my horses on those trails for decades and that area is a gem for North Kitsap, something not seen in too many other areas. It should be treated as such and not cleaved in half for the sake of out-of-area visitors or the shareholders of the Port Gamble project.</p> <p>I would highly encourage those in charge to redirect those many millions of dollars slated for the STO and put it towards a more practical endeavor such as making the roads safer for non-motorized traffic. If the County states our goal is to cut down on greenhouse gas emissions, then let's make it easier, safer, and more enjoyable for folks to choose those alternatives. Miller Bay Road would be an excellent place to start with installing a bike, pedestrian, (and dare I dream, equestrian) pathway on the shoulder. I think community members would all like to see dollars spent on more practical issues rather than a vanity project like a paved recreational road through the middle of the forest.</p> <p>In closing, as a commentor so aptly stated at the April 8th meeting, it's time to make the difficult decision of choosing what is best for wildlife, our environment, and our rural way of life over the lure of development and all the money that that promises. Once unfettered development begins it can never be reversed and what is unique and special about this area will be gone forever. We do not need to be another Kent/Covington or Renton Highlands, let's choose something different and learn from what we all see has happened to those and many other previously rural areas in Washington.</p> <p>Respectfully, Eileen Sorg</p> <p>James Towner Bonnie Sorg David Harrison Jolina Fanua</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
306	4/11/2024	Cindy Allpress	Land Use	Land Use, Site Specific	<p>Thank you for extending the comment period!</p> <p>We are on Central Valley Road which is one of the last unincorporated areas in Kitsap, and is historically a farming/rural community. However there are two HUGE developments in the works within a mile of our farm.</p> <p>URGENT! TREE HARVESTING? : I just heard 'thru the grapevine' last week, that the Paint Ball rec' area (off Waaga Way) was told to be out by April 20th, as the RUSH Development was planning to start removing trees on the 25th. I have sent eml to the planners asking to confirm this but still have not had a reply. THIS IS VERY UPSETTING since 3 years ago we asked the developer to PLEASE Leave some existing mature old growth as a buffer between us. We have had NO communication from the county on this.</p> <p>Reference: General Land Use Goals, Policies and Strategies ( 2024 KC Comprehensive Plan - 2024 Draft )</p> <p>Land Use Policy 1.4 - Implement land use designations through a clear regulatory process that ensures transparency fairness, and predictability in the land development process.</p> <p>THE ROYAL VALLEY PROJECT: This project has been rezoned several times and from what I see it looks like they're rezoning YET AGAIN to increase the density to 9-14 units per acre. AND add an apartment complex AND townhomes all in these 2 parcels. Neighbors have had absolutely no input here.</p> <p>o"UNDER THE RADAR" REZONING: This has not been the case with the rezoning and reclassifying of the Royal Valley Development (as an example). This large development project has been rezoned and reclassified multiple times to increase density after the first project was originally proposed and rezoned for senior housing and the land owner passed. Some of these decisions were latched onto amendments that didn't happen with the Comprehensive Plan Update. If the community knew better about the potential for these types of changes on land use, it would of afforded a better opportunity for community feedback keeping the process transparent. That was not the case. This raises the question of Land Use Goal 4 - Property Rights Policy 4.2 "Property owners are to be protected from arbitrary and capricious land use decisions and actions" who was this goal written for? Property owners to whom are looking to take a land use action, or property owners near a land use action, if it is the latter, the County should be questioning their practices with Royal Valley and Island Lake - what is the true purpose of a rezone?</p> <p>oNO TRANSPARENCY FROM DCD. The radius of notifications to neighboring properties has been limited in comparison to the size of this project, essentially keeping public notifications to a minimum and public comment at bay. Neighbors have shared being included in the postcard notifications and then sometimes not. Inconsistent at best. This does not just sit with Planning, but it also crosses over to other City Departments such as Public Works and Street projects. The County needs to do a better job communicating to the public and involving neighbors to keep processes transparent. During attendance in Royal Valley hearings, project questions were presented by neighbors but were dismissed by not only the developer, the engineering firm, the planner, but also the hearing examiner. I hope this is not something that happens often as the public has the right to be heard, addressed, and answered.</p> <p>oNEIGHBORHOOD/PUBLIC AWARENESS: No Neighborhood meeting was held during pre-application of Royal Valley, during permitting, nor currently, again, not meeting the Counties transparency policy. As per Kitsap County Code 21.04.130 - As this process is "optional", the code should be revised to require projects that meet a certain criteria, to have a neighborhood meeting (a neighborhood meeting is NOT a couple neighbors walking around a project site with a developer). Apparently this was a consideration years back to make neighborhood meetings mandatory, however Im told that the County removed the requirement?! WHY? As public awareness is key and truly addresses Land Use Policy 1.4.</p> <p>The Royal Valley project is not compatible with adjacent properties, zone, or culture along THE ENTIRE AREA (North, West, or East). It will have a large impact on ALL the areas surrounding the project during each phase of the project. Increased density in this location is not needed or warranted by the data and statistics provided.</p> <p>Public safety is already pressed and at its breaking point in the entire County. Increased housing and density opens up the potential for more crime and life safety demands. As the comprehensive "plan" writes on goals for affordable housing, jobs, etc. it doesn't do a good job in writing goals and policies on "planning" for any land owners (with the EXCEPTION OF DEVELOPERS of course.)</p> <p>From my observations it appears to me that the DCD has been bought and paid for by developers as of late. I see so much development going on and really nothing protecting existing farms, or giving priority to rural areas.</p> <p>ISLAND LAKE PROJECT: At least they did hold one community meeting for this project. But everything above applies to this project also.</p> <p>THANK YOU for your attention. I truly hope that the county is looking out for its residents and not for the developers who care only for their profits.</p> <p>Bob &amp; Cindy Allpress</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
307	4/11/2024	Doug Hayman	Comp Plan	Transportation, Infrastructure	<p>Good evening Commissioners,</p> <p>I would like to focus your attention on the detailed and thorough submission by Paul Dutky of the West Sound Cycling Club (pages 199 through 311 of the Comprehensive plan comments). These are in regard to the County’s non-motorized transportation plan and how the needs for bike facilities has been inadequate all over North, Central and South Kitsap. This document includes many photographs of roads showing actual shoulder widths demonstrating most roads in Kitsap County lack the minimum standards for bicyclists to safely travel between communities, commute to work, or to access services. Often, they have no shoulder on one side and an inadequate shoulder on the other side for riders. And where there are sidewalks running parallel to the roadway, they are not wide enough to meet the shared path standards of being 10 feet wide.</p> <p>As we encourage people to live in urban growth areas within close proximity to locations they need to go to on foot, bicycle, wheelchair or with strollers they need the infrastructure to do this safely.</p> <p>There have been several cycles of widening improvements being part of the past road plans only to have those dropped leaving the needs unmet.</p> <p>Meanwhile, there has been way too much effort and expense applied towards the feasibility study for the NSTO which would provide only 8 miles of paved path going from Kingston, through and degrading the North Kitsap Heritage Park to get only as far as the Port Gamble area at an estimated cost of 89.4 million dollars. This study has been a distraction from developing a connected, comprehensive non-motorized transportation system for the County’s residents to use in day to day travel and not solely for recreation.</p> <p>We have limited funds, and if we want to move forward with the goals set forth in the non-motorized plans we need to look clearly and systematically at developing a useable non-motorized transportation system. We need to use re-paving opportunities to build useable shoulders. We need a system that meets County resident needs and is not skewed by the ideas of a corporation and special interest groups.</p> <p>Please refocus the goals for county employees in Public Works to meet the non-motorized needs of all of Kitsap County</p> <p>Thank you for the work you three do (and your support staff as well).</p> <p>Doug Hayman Indianola, WA</p>
308	4/11/2024	KEC	Comp Plan	Environmental, CAO	<a href="#">See pages 600-611</a>
309	4/11/2024	Beverly Parsons	Comp Plan	Land Use	<a href="#">See pages 612-617</a>

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Comment #	Date Received	Name	Category	Subcategories	Text
310	4/11/2024	Mary Ramsey	Land Use Reclass (Site Specific)	Land Use, Island Lake	<p>Good Afternoon,</p> <p>I am a resident of Island Lake (20+ years). I love living here and since I have lived here there have been many changes, both positive and negative.</p> <p>One of the reasons I live here is the quality of life and natural environment. I live across the road from the park. I am discouraged and saddened by the development and loss of trees and wildlife habitat that has happened over the years. A number of folks live here because we like the natural world and what it includes. The more development the more loss of this life style. I encourage you to preserve the natural world around a small lake that cannot take much abuse. This is a resource that is used by many for access for swimming and fishing and enjoyment. Permitting development along the lake is less than caring about the citizens and the environment, it is only to line someone’s pocket with money. For most of us, it is not worth it!</p> <p>That being said, I beg you to not change the zoning to allow more homes per acre as requested. Also, the need for affordable housing is not a consideration in this request as these homes will be affordable only to those who have a three figure income. And, the traffic along Island Lake Road has increase by 10 times since I moved here and folks are not driving the speed limit and not staying in their lane. It can be terrifying driving along this narrow road. We do not have the infrastructure to support hundreds of more folks driving at least two cars per day along our narrow road/streets. Also, I am concerned about the availability of water, power and other resources necessary for a household. The school system is struggling, as are most of the public services. Please, please allow of to preserve what we have and save us from becoming a suburban community which none of us signed up for.</p> <p>Thank you so much.</p> <p>Mary D Ramsey</p>
311	4/11/2024	Nanette Brown	Land Use Reclass (Site Specific)	Land Use, Site Specific	<a href="#">See pages 618-619</a>
312	4/11/2024	Brooke Hammett	Land Use Reclass (Site Specific)	Raydient Reclassification	PLEASE do not allow the rezoning of the Stottlemeyer property!
313	4/11/2024	BlueVoterWA	Land Use Reclass (Site Specific)	Raydient Reclassification	NO BOND REZONE
314	4/11/2024	Lonnie D.	Comp Plan	Economy, Code	<p>I have tried to contact the commissiones office for a comment. The Comprehensive Plan is complex. I understand that. It takes a contractor or a person who has been dragged into this dog fight to see the results of each one of those rules. As a home owner, the Comprehensive plan is a good example of the County - City – and State who want to look under each rock and find a new tax with a regulation. Plain and simple, you have understaff Building Departments, New Regulations added by the da, with people looking a each other asking “What is it they are doing or trying to do”? The answer is look it up in the code. As an example “You want more housing for low income. If my property tax shoots up for building an ADU or Low income unit, the county tax the heck out of me for building it. Give me a tax incentive or moratorium on that housing. No Government agency offered advise or help with the kind of program that we can work with. Heck why not offer some of the Grant Money? Or talk about land use. Have a way for the public to ask a question without shoving it off to a text me or send me an email” . I have given up. I am one guy who tried to work with this program and just give up. If I need to build or work on another project, I would rather support those small business who want the fight. I really feel sorry for the people who are trying to work with you and feeling nothing but pain. Just keep it up, your going to drive the little guy right out of the business that supports labor who try to get by, Nice one Washington.</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
315	4/11/2024	John M.	Comp Plan	Infrastructure, Economy	<p>City, County, State, they are all empire building crating more regulations and more taxes. The septic gravity drain filed was not keeping up on one of my rentals. Years ago, the solution would have been to simply dig more trench and lengthen the drain lines for which there was plenty of room (over 1 acre lot)</p> <p>-Would it solve my problem without any issues? Yes. Can I do it? No, that doesn't meet regulations. Once the County was done with me it was a pumped, pretreated (aerated) 3 tank solution costing over \$30K. The same drain field area could have been used for the old gravity system. Take that level of over-regulation to every other aspect of things in the City/County/State and we get what Lonnie describes.</p>
316	4/11/2024	Karen M.	Comp Plan		<p>Now days it always about money and lining their pocket.</p>
317	4/11/2024	Patrick Donelly	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>I write to urge the County Commissioners to NOT approve the Raydient Rezone request. This idea is preposterous. The traffic on Bond Rd can not accommodate this type of development. Approval would no doubt result in multiple Growth Management Act lawsuits for the County and its taxpayers. There are two Urban Growth areas already, five miles away. One of them, Poulsbo, already has a rec center in progress. The idea that Raydient might provide land for a new rec center championed by the North Kitsap Kingston Rotary is a red herring and essentially a bribe by Raydient. I remind the Commissioners that the Rotary members are not elected officials. In this case they do not represent the will of North Kitsap citizens despite their media blitz otherwise.</p> <p>Please vote no on Raydient's rezoning request.</p> <p>Sincerely,</p> <p>Patrick J. Donnelly Kingston</p>
318	4/11/2024	KAPO	Comp Plan	Housing, Land Use	<p>County Commissioners,</p> <p>Here are KITSAP ALLIANCE OF PROPERTY OWNERS written critique of the proposition there could be "expedited permit processing" for Multiple Family Residential Projects after adoption of the 2024 Comprehensive Plan. Since the DEIS has not yet been finalized and this concept is made apart of Alternative No. 2, what is submitted herein is grist for expanded analysis in the Final EIS as well as in plan and ordinance provisions.</p> <p>KAPO believes such a proposition is untenable and will not become a type of process the County can implement. And if it can or might, then tell us and the rest of Kitsap County's development community why such an expedited permit process cannot be the norm for all permit processing?</p> <p>Bill Palmer, President KITSAP ALLIANCE OF PROPERTY OWNERS See attachment on pages</p>



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Comment #	Date Received	Name	Category	Subcategories	Text
319	4/11/2024	Lisa	Land Use Reclass (Site Specific)	Raydient Reclassification	<p>Greetings, first thank you to our Kitsap County Commissioners for extending the Public Hearing comment deadline. In earlier comments I have expressed opposition to the rezoning classification request of RW to RR and RW to RC by Rayonier/Raydient for the North Kitsap United proposed project. While watching the Hearing on tv, I was pleased to see the room was filled to capacity since public participation is a vital part of updating the Comp Plan. Many individuals voiced their opposition to the Island Lake and Rayonier/Raydient rezoning requests and only a few, mainly Kingston Rotarians, voiced their opinion for wanting the Rayonier/Raydient project. If the community really felt a need for the proposed NKU sports complex and YMCA, and to have the RW zone changed to RR and RC there would have been more people showing up to support the rezoning classification. Those that did voice their support indicated if the rezone was approved the NKU project would provide many benefits to the community, including being given 200 to 300 acres or more of open space for free. I believe it is common knowledge to all of us that nothing is given away for free. There will be huge costs, both financial and environmental, to the County and community if the rezone is approved and the YMCA, sports complex, sports fields, restaurant, 80 houses and a strip-mall are developed along Bond Road. Many of these costs have been expressed by individuals in the written comments already submitted to DCD and in oral testimony at past Commissioner meetings. A prime example of costs associated with maintaining a sports complex with sports fields would be Pendergast Regional Park located in Bremerton. I read in a Kitsap Sun article, Sept. 16, 2018, " The 50-acre athletic complex hasn't lived up to what the city officials envisioned since it opened in the 1990s" . The article goes on to say that \$13 million was needed for a park makeover. Ultimately, if the rezone is approved, who is going to pay for this project? NKU has been trying to raise \$750,000 from the community and has only raised below \$20,000 to date. One person watching the Hearing via zoom, voiced her support of the project saying that the location was an ideal spot and yet looking at the feasibility study on the NKU website, the conclusion made was traffic was a large issue and that further geological studies needed to be done. The feasibility study didn't show any costs associated with the project therefore the community is left in the dark as to what they are. Finally, this project no doubt will contribute to urban sprawl in a rural area if the rezone is approved. The GMA and Puget Sound Regional Council stress the protection of rural areas and object to urban sprawl in rural zones . If the County allows this rezone, what stops others from requesting rezone changes that will intensify urban sprawl throughout what is left of our rural environment? Thank you for giving me this opportunity to voice my concerns.</p>
320	4/11/2024	Joe Lubischer	Parks Element	Infrastructure, Economic	<p>This comment addresses budget, planning, and financing for our county park system. The present picture of the Parks Departments financing and budgeting is of a scattered and incomplete process, and one with a time-frame of 6-months, not the nominative 6-years of the Parks Capital Improvement Plan.</p> <p>There are multiple problematic examples.</p> <p>* For five years, we’ve repeatedly heard that the Parks Department can’t cover installation of vault toilets, toilets which continue to sit in storage. * Park stewards have been repeatedly unsuccessful in having even a small projects considered for the Parks capital plan. * Recently, we’re told there is no money for resource assessments at Coulter Creek heritage park or for ecological assessments at PG park. These assessments are crucial planning steps detailed in the PROS Plan.</p> <p>Yet at the same time, the Commissioners’ office and Parks Department have penciled in \$73M for a Port Gamble Forest Heritage Park center with camping and glamping, plus part of an STO shared-use-path.</p> <p>An approach is needed to assemble and compare these big expenditure proposals with deferred maintenance for existing facilities, needs for ecological assessments, support for environmental restorations, and creation of a pathway for small projects.</p> <p>There is a clear need for the Comprehensive Plan to emphasize practical planning and decision-making for our parks. Operational requirements and capital desires must be aggregated in a single place for analysis. The County must perform a comprehensive review of financing options and project alternatives. This review would (1) identify current planning, maintenance, and operational needs, (2) identify future restoration and development projects; (3) prioritize needs and projects, with emphasis on long-term sustainability; and (4) determine funding requirements; and (5) identify funding sources.</p>

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Comment #	Date Received	Name	Category	Subcategories	Text
321	4/11/2024	Joe Lubischer	Comp Plan	Land Use	<p>Comment for Kitsap County Comprehensive Plan on County handling of land use policy plans</p> <p>Most County parks have land-use policy plans, such as forestry and master planning documents. Historically, some were approved by the BOC, others were not. Last year, Commissioner Gelder said the Port Gamble Forest Heritage Park master plan did not require BOC approval. Just on that basis, the County's internal review/approval process is unclear.</p> <p>But more importantly, none of the park plans were ever properly approved as required by state law, either via a Type III public hearing or as part of an annual or periodic review of the Comprehensive Plan or amendments thereto.</p> <p>One example is the North Kitsap Heritage Park Forestry Stewardship Plan and the NKHP Master Plan. The former was approved by the BOC, the latter was left in limbo. Neither had a public hearing or were ever part of a Comprehensive Plan. Another example is the Port Gamble Forest Heritage Park Framework/master plan. We were informed that this plan would be part of the current Comprehensive Plan, but we see no evidence of that plan or any review as part of the Comp Plan deliberations.</p> <p>The County continues to act negligently and illegally by avoiding mandated processes for review and approval of these land-use policy plans.</p> <p>Joe Lubischer</p>
					<p>PGFHP Master Plan/Framework; County Policy-making, Administration, and Implementation Processes</p> <p>The Kitsap Environmental Coalition (KEC) Steering Committee suggested 10 principles to guide completion of the 2024 Comp Plan Update in its submission for the April 8th Board of County Commissioners (BOCC) public hearing about the plan.</p> <p>Under principle 7(related to the Park system), the KEC group requested that the existing unapproved Port Gamble Forest Heritage Park (PGFHP) master plan/framework not be approved until (a) it has been redesigned by a group representing a broader range of people and perspectives than those involved in the existing draft master plan/framework and (b) it had been considered in light of the Preferred Land Use Alternative selected by the BOCC.</p> <p>I’m writing on my own behalf with an additional reason for not approving this plan: Ensure that the legal approval process for plans of this type is followed</p>

Comprehensive Plan Comment Matrix - Comments Received through 4:30 p.m. April 11

Comment #	Date Received	Name	Category	Subcategories	
322	4/11/2024	Lisa Hurt	Comp Plan	Land Use	<p>The county has an excellent opportunity now to refine and improve its policy making, regulatory, and implementation processes in general during this Comprehensive Plan Update. Use the PGFHP master plan/framework as a prime example for working through improvements in the decision making and implementation processes of the County.</p> <p>Background:</p> <p>On October 18, 2022, Bryan Telegin, an attorney hired by KEC, sent a letter to Alex Wisniewski and the Board of County Commissioners detailing the legal process for approval of the PGFHP master plan/framework. The attorney’s letter was sent because it appeared that the county thought that this master plan/framework could be approved by the Board of County Commissioners by a simple board vote to adopt it. That approach is illegal.</p> <p>As you’ll see in the letter, two options exist for the approval process for the framework/master plan:</p> <p>(1) through the County’s Type III approval process which involves approval through the County’s Hearing Examiner and involves a public hearing; or</p> <p>(2) in conjunction with the review under the Growth Management Act, in that case, as part of the county’s “annual docket” for yearly comprehensive plan amendments, or in concert with all other comprehensive plan amendments as part of the standard periodic review cycle.</p> <p>The county chose to consider the PGFHP master plan/framework through the second process, that is, in conjunction with all other Comprehensive Plan amendments as part of the standard periodic review cycle (per communications with Eric Baker).</p> <p>The attorney’s letter goes on to say that the proposed framework is a “land use policy plan”. The letter further quotes a ruling by the Growth Management Hearings Board (GMHB) that a land use policy plan that guides land use decision-making in a city or county is a subarea plan within the meaning of RCW 36.70A.080. If such a plan is adopted it is “... subject to the goals and requirements of the Act and must be consistent with the comprehensive plan.” See the attached letter for further details.</p> <p>Broader Implications for County Processes</p> <p>I have been involved over the past 18 months with the Comp Plan Update and several groups that are seeking to give high priority to the protection and regeneration of our ecosystems for the well-being of current and future generations of all Kitsap inhabitants, including wildlife. I am also involved in groups focused on affordable housing and communities.</p> <p>In so doing, I am seeing a variety of situations where there is a need and opportunity for the County to improve its policy making, regulatory, and implementation processes in general.</p> <p>Working through the PGFHP master plan/framework redesign and approval process can serve as an excellent “test case” for working out improvements in the decision making and implementation processes of the county. It can also reveal how changes need to be made in master plans/frameworks in other heritage parks, and around other issues such as those related to transportation.</p> <p>There are many historical and current reasons for the existing major entanglements of decision-making on policy, regulatory administration, and implementation throughout County government.</p> <p>Now is the time to use specific situations related to the Comp Plan Update process to improve these processes and set the County on a new course that allows it to deal with the new complexities of climate and social changes.</p> <p>Beverly Parsons</p>
323	4/11/2024	Bill Palmer	Comp Plan	Land Use, Site Specific	<a href="#">See pages 620-629</a>
324	4/11/2024	Jess McCluney	Comp Plan	Land Use, Housing, Transportation	<p>Hello,</p> <p>My name is Jessica McCluney and I work at a five-acre farm in Poulsbo. At Full Tilth Farm, we grow vegetables, berries, and plant starts and sell them at Poulsbo Farmers Market, Kitsap Fresh, foodbanks, and on our farm to our CSA (a group of customers who have subscribed to receive a season of vegetables from our farm). We value the opportunity to feed our community, partner with other local businesses, educate and employ future farmers and our customers, and to preserve open space in the county. My farm is one of many small farms in Kitsap County that is committed to fostering healthy, thriving rural communities.</p> <p>I am writing in support of Alternative 2 that focuses on compact growth in Kitsap County. We need to control sprawl in Kitsap County in order to preserve both wild spaces, recreational spaces, and farmland/ other working rural space. We need to focus on providing affordable housing so that people who intern and work on farms (and other local businesses) can afford to live close to work (many of my fellow interns have moved away, finding housing unaffordable here). We need a transportation plan that focuses on public transportation and shared-use paths and BIKE LANES, so that families like mine can choose to travel safely in ways that reduce car usage. We need to prioritize ecosystem health by maintaining open space and park lands for the health of all county residents, including wildlife.</p> <p>Thank you,</p> <p>Jessica McCluney</p>
325	4/11/2024	Jack Stanfill	Land Use Reclass (Site Specific)	Land Use, Site Specific	<a href="#">See pages 630-640</a>

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Dear all,

We have received the latest update regarding the review/amendments/proposals on Kitsap County Code. We have included the string of emails related to this issue.

We failed to see our proposal being considered and/or included in the list of proposed amendments in the Draft.

So, upon consultation via email with Commissioner Rolfes, we are re-sending the proposal a second time and we hope it will make it through to the draft and final. We are planning to be at the meetings, at least at the in person meeting.

Please confirm if you have received the proposal attached to this email.

Thank you

Rev. J. Conrad Lampan

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I am attaching to this email a letter requesting modifications/amendments to the KCC presently under review.

I am copying this to the other parties involved originally in this communications.

Thank you

J. Conrad Lampan

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**From:** Jeff Rimack <[JRimack@kitsap.gov](mailto:JRimack@kitsap.gov)>  
**Sent:** Wednesday, September 6, 2023 3:27 PM  
**To:** [pastor@thehighway.us](mailto:pastor@thehighway.us)  
**Cc:** Colin Poff <[CPoff@kitsap.gov](mailto:CPoff@kitsap.gov)>  
**Subject:** RE: Formal response to The Highway Church's subdivision inquiries

Hello,

Currently the Comprehensive plan is being reviewed currently with the plan for implementation to be done no later than December 2024. I am including a link to the Comprehensive plan update website and cc'ing Colin Poff, Long Range planning supervisor here. Colin is a good person to reach out to with concerns or changes proposed as a part of the update.

[https://www.kitsapgov.com/dcd/Pages/ComprehensivePlanUpdate\\_2024.aspx](https://www.kitsapgov.com/dcd/Pages/ComprehensivePlanUpdate_2024.aspx)

Respectfully,

	<p><b>Jeff Rimack</b> Director Kitsap County Department of Community Development <b><i>Your Partner in Building Safe, Resilient, and Sustainable Kitsap County Communities!</i></b> (360) 337-5777 <a href="https://www.kitsap.gov/DCD/">Kitsap.gov/DCD/</a>  <b><u><a href="#">SIGN UP HERE FOR DCD NEWS UPDATES</a></u></b></p>
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**From:** [pastor@thehighway.us](mailto:pastor@thehighway.us) <[pastor@thehighway.us](mailto:pastor@thehighway.us)>  
**Sent:** Wednesday, September 6, 2023 11:45 AM  
**To:** Jeff Rimack <[JRimack@kitsap.gov](mailto:JRimack@kitsap.gov)>

**Subject:** RE: Formal response to The Highway Church's subdivision inquiries

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Last question for now.

When is the next review of the rules and such scheduled to happen? You mentioned every 8 years.  
When would be the next?

Thanks  
JC



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**From:** Jeff Rimack <[JRimack@kitsap.gov](mailto:JRimack@kitsap.gov)>  
**Sent:** Tuesday, September 5, 2023 4:55 PM  
**To:** [pastor@thehighway.us](mailto:pastor@thehighway.us)  
**Cc:** Christine Rolfes <[CRolfes@kitsap.gov](mailto:CRolfes@kitsap.gov)>  
**Subject:** RE: Formal response to The Highway Church's subdivision inquiries

Good afternoon Rev. Lampman,

I am responding to your question below in [blue](#).

In the end there is no way to achieve your goal without violating the Kitsap County Code which it is our job to enforce.

	<p><b>Jeff Rimack</b> Director Kitsap County Department of Community Development <b><i>Your Partner in Building Safe, Resilient, and Sustainable Kitsap County Communities!</i></b> (360) 337-5777 <a href="https://www.kitsap.gov/DCD/">Kitsap.gov/DCD/</a> </p>
<p><b><a href="#">SIGN UP HERE FOR DCD NEWS UPDATES</a></b></p>	

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**From:** [pastor@thehighway.us](mailto:pastor@thehighway.us) <[pastor@thehighway.us](mailto:pastor@thehighway.us)>  
**Sent:** Tuesday, September 5, 2023 12:14 PM  
**To:** Jeff Rimack <[JRimack@kitsap.gov](mailto:JRimack@kitsap.gov)>  
**Cc:** Christine Rolfes <[CRolfes@kitsap.gov](mailto:CRolfes@kitsap.gov)>  
**Subject:** RE: Formal response to The Highway Church's subdivision inquiries

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Good morning Mr. Rimack,

We appreciate your response and the quite clarifying letter you sent in response to our request for zoning relief. Also, thank you Ms. Rolfes for taking time to look into this.

I read your letter carefully and read some of the references you pointed to, i.e. the “density” factor. I wanted to come back to you with some considerations, after I contacted the GMS regarding the GMA which you referred to, and they suggested to keep talking with you about the issue.

I want to make these main points of consideration,

1. Since the church is not planning or considering developing dwelling units on the property it owns, and the church is not applying or considering to apply for a construction permit to develop such dwelling units, then the “density” rule does not need to be factored in the request to split a portion without any kind of development planned. I think that the issue at play here is more semantic than practical. [Rev. Lampman while I can understand the train of thought being employed regarding development planned it is not accurate or in alignment with Kitsap County Code \(KCC\) There is no legal way to create two parcels to accomplish your goal without a land subdivision, and land subdivision is development. Density is a KCC required factor in any land subdivision and cannot be set aside based on the churches intentions for the parcel.](#)
2. If the church were to follow your suggestions and work with a non-profit developer, then the church would effectively lose the use of the property for other church uses, current or future; in this scenario the church would have had relinquished the use of the land for church purposes. [I am aware this was very likely not a desire of the church, but was working to provide options. There is no expectation you follow this Course of Action \(COA\).](#)
3. Selling the property in full is not even an option, as the church is using and constantly keeping the buildings for proper church use, and the parsonage as a dwelling unit. This would be paramount to force the church to sell its property because the county has other plans for the

land. No one is forcing the church to take an action Reverend, merely presenting potential options that are completely a church decision.

4. As we mentioned in our original letter, no construction is involved, no changes in landscape that could warrant a study of the terrain, the hill, landslides, or any impact on the designated wetlands; in fact the house designated as parsonage remains in the same place with no modifications, or any such in planning. Kitsap County Code and state statute require subdivision to create a new parcel. Kitsap County Code requires that density requirements be met for any land subdivision. There is not way around this requirement regardless of existing structures.
5. (As a parenthetical note: Years ago the church applied and obtained permits to build a new construction/sanctuary and/or later on an extension to the present church building. The new construction was to be on the land in between the present church building and the parsonage. All the studies, environmental, land, landscape and all the required ecological and other studies were performed and the plan was approved. For reasons outside of the scope of this note, the construction was not done. However, I wanted to point out that no such a thing as density was ever required to approve that permit. If the church would eventually consider such a development for the expansion of the church, then it would be denied the use of its land?) The action previously permitted is different from what you are requesting now. You are requesting to subdivide the parcel which is why meeting density is a requirement.
6. From where we stand, we see this whole situation as the county taking effective ownership of the church property, and because of that denying the church the benefits it would receive from the selling of the parsonage. There is not taking as the church does not have two parcels. You are requesting to subdivide a process which has rules and codes that govern what is required. Any parcel in the zone your church is located will be held to the same requirement if they choose to subdivide.

This is all for now. I am reading some of the materials within the GMA and also from the WAC regarding urban density, and it seems to me that the counties and cities have a lot of leeway in the way they can deal with these issues. (I am curious about this sentence in the WAC: “**Counties and cities need not force redevelopment in urban areas not currently developed at urban densities**” Kitsap County Code was modified a little over 20 years ago to drive an increase in density in Urban Growth Areas (UGA). There is no leniency or ability to set aside KCC which is the equivalent of what would be needed to meet your goal. The only way to subdivide to two parcels would be to change KCC. The impacts of such a change would encompass more than just your church and would need to be holistic across for all of Kitsap County. As indicated in my letter this would without a doubt be challenged and goes against previous rulings that have been made by the GMHB.

I really wish there was a way to assist you in this venture, but as KCC is currently written there is no way staff can accomplish what is requested without violating KCC.

Thank you for your time

Rev. Lampan




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**From:** Jeff Rimack <[JRimack@kitsap.gov](mailto:JRimack@kitsap.gov)>  
**Sent:** Friday, September 1, 2023 2:14 PM  
**To:** [pastor@thehighway.us](mailto:pastor@thehighway.us)  
**Cc:** Christine Rolfes <[CRolfes@kitsap.gov](mailto:CRolfes@kitsap.gov)>  
**Subject:** Formal response to The Highway Church's subdivision inquiries

Hello Rev. Lampan,

My name is Jeff Rimack, and I am the Director for the Department of Community Development (DCD) here at Kitsap County. Commissioner Rolfes shared information with me surrounding The Highways Church's desire to subdivide into (2) parcels and your request for formal response to that request. Attached is DCD's formal response as requested. A physical copy of the letter is also being sent in the mail.

If you have any questions or concerns, please let me know. I hope you enjoy the long weekend.

	<p><b>Jeff Rimack</b> Director Kitsap County Department of Community Development <b><i>Your Partner in Building Safe, Resilient, and Sustainable Kitsap County Communities!</i></b> (360) 337-5777 <a href="https://www.kitsap.gov/DCD/">Kitsap.gov/DCD/</a>  </p>
<p><b><u><a href="#">SIGN UP HERE FOR DCD NEWS UPDATES</a></u></b></p>	

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Dear Mr. Poff,

I am writing at the suggestion of Mr. Jeff Rimack, after an extended letter and email exchange with his department as well as with Commissioner Christine Rolfes and former Commissioner Robert Gelder.

Our church is in a bit of a quandary because of a situation related to our request for zoning relief, that it does not seem possible with the present Kitsap County Code, particularly the title stated by Mr. Rimack, KCC Title 17.105.110

*"At the request of the applicant, in writing, the director may also authorize a variation of up to ten percent of any numerical standard, **except density**, when unusual circumstances cause undue hardship in the strict application of this title . . ."*

We are requesting that some kind of provision be incorporated to the code, with respect to the above title, that would permit the director to authorize exceptions in certain particular cases, where the strict application of the code will cause direct and obvious harm to the requesting party, and where the strict application of the density title above will prevent benefits to the parties which in the end will prevent benefitting the community.

There are situations, like our present problem, in which the strict application of the code creates a fundamentally unreasonable situation, and if you would allow me the word, totally ridiculous.

## **Case Study in a nutshell**

The Highway Church, located in 2133. NW Nuthatch way, Silverdale WA 98383, owns the land in which the church and a parsonage sit, measuring about 3.76 acres.

The church has been at this location for much longer than the present code was established. The buildings were constructed in the 1960s, originally at address 11632 Silverdale Way NW for the sanctuary and 11642 Silverdale Way NW for the parsonage, until the lane was changed to name Nuthatch Way.

There are two buildings, one in the west end of the land with is the sanctuary and offices, that is the main church building, with present address at 2133 NW Nuthatch Way. The other building is the parsonage located on the east end of the property, with address 2045 NW Nuthatch Way, with most of the free land in between.

The parsonage is somewhat separate from the main building and the larger portion of the land by

a mostly dry creek which has been designated as wetland some years ago. Roughly put, the parsonage sits on approximately  $\frac{3}{4}$  or so of an acre.

The church wants to sell that portion of the land, including the parsonage building to the current pastor. The purpose of the sale is to cancel some back debts, and to use the remainder that the pastor will pay to the church, to cancel an old mortgage the church still owes. This plan means a benefit for both the pastor and the church.

According to the Kitsap Code invoked by the County officers in authority at the corresponding departments, the only possible way to achieve this, would be to subdivide/develop the whole of the property into some 18-33 plots, providing the necessary access and utilities to each of those lots, and also it might be required to do an impact study regarding the designated wetland, as well as a study regarding possible liquefaction of the hill side behind the property on the other side of the easement road, in case of earthquakes or such. A straight split of the property into two sections does not seem possible with the current code.

The implications from strictly enforcing the code in its present form -unless there is a provision somewhere else that could be used presently- are



quite unsurmountable. If the church would consider the subdivision it would be costlier than the expected financial benefit from the sale of the parsonage.

Using logical reasoning, we consider, that since there would not be any construction involved as the building in question is already built, and that since the parsonage sits on the other side of the designated wetland, so said wetland would remain untouched, and that the study about possible liquefaction due to possible earthquakes would be literally moot since the building is already built on the land, and that if the church were to develop the land in between the main building and the designated wetland it would lose the use of that part of the land for other church purposes as it is being used now for church and community purposes, and that not being able to simply split the portion intended for sale would meant direct harm to the church in the form of financial benefits forfeited in the face of the restrictions imposed by the present Kitsap County Code, almost as if the county would have taken ownership of the property and thus not allowing the benefits, etc., we request that an exception be made, and that an amendment or correction be added to the present code, either modifying Tile 17 to accommodate certain exceptions to the density requirements,

possibly adding an element of reasonability to the code.

To summarize the above long paragraph, since no changes are proposed to the existing buildings, and no permit is thus requested for such, the most logical, reasonable, and direct approach should be considered, to allow a simple split of the land into two lots.

With thanks for your consideration,

J. Conrad Lampan  
Senior Pastor  
The Highway Church  
2133 NW Nuthatch Way  
Silverdale, WA 98383  
Phone: 360-692-2215  
Email: [pastor@thehighway.us](mailto:pastor@thehighway.us)

[Return to Comment Matrix](#)



# kitsap 2044

Comprehensive Plan Update Comment Card

Bill Budd

NAME

buddbill@hotmail.com

EMAIL

Map shows that Wynn Jones  
Preserve has access to Rich Passage  
but seems ~~difficult~~ that you would  
have to go down private driveway.  
How do you access the waterfront  
section?

For further comments or questions please email: [compplan@kitsap.gov](mailto:compplan@kitsap.gov)

[Return to Comment Matrix](#)



# kitsap 2044

## Comprehensive Plan Update Comment Card

KATHIE Lusting  
NAME

Kathie.lusting@icloud.com  
EMAIL

Do not expand SEPA exemptions  
SEPA Checklists need stronger review/oversight  
Protect Urban canopies  
Protect Priority Habitat  
Strengthen don't weaken CAO's  
Enforce CAO's

For further comments or questions please email: [compplan@kitsap.gov](mailto:compplan@kitsap.gov)

[Return to Comment Matrix](#)





# kitsap 2044

*Comprehensive Plan Update Comment Card*

NAME

EMAIL

Suggest that if we have the massive projected population growth forecast, that Kitsap consider an electric "people mover" or monorail rapid transit. That way we have more potential for housing development & less habitat destruction. Build further out yet move people in reliably & quickly.

For further comments or questions please email: [compplan@kitsap.gov](mailto:compplan@kitsap.gov)

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SENT VIA EMAIL

January 21, 2024

Christine Rolfes, Commissioner  
Charlotte Garido, Commissioner  
Katie Walters, Commissioner  
Kitsap County Commissioners Office  
619 Division Street, MS-4  
Port Orchard, WA 98366

Dear Commissioners,

RE: Proposed rezoning of Raydient/Rayonier Property on Bond Road

It is my understanding that the owners of this property are proposing a rezoning from 20-acre minimum to a 5-acre minimum lot size so that a new home development of about 80 new homes can be built. **We are in TOTAL OPPOSITION TO THIS ZONING CHANGE for the following reasons:**

- We have a growth management act that currently states where the higher density development may take place in the county. This area is zoned at 20 acre minimums for a reason. It needs to stay rural.
- Bond Road is now at capacity and is a highly traveled, high volume, high accident corridor, from Poulsbo to Kingston and the ferry. Literally all travel from the Kingston ferry now travels some or all of Bond Road.
- Another 80 houses would equate to a minimum of 160 vehicles entering and exiting this already bumper to bumper traffic corridor which would require turn lanes and/or another signal light. If you consider that the lots could also have ADU units and RVs the number would be even greater.
- Our essential services, fire, police/sheriff, water, sewer, and schools are already over extended and this would add to the burden on these services without any compensation from developers to mitigate the cost. That would leave it up to local taxpayers to foot the bill for this developer's profit.
- Impact to the watershed, ground run off and impact to habitat. The runoff on this property directly flows into Port Gamble Bay and with development and additional hard surfaces it will have a negative effect on water quality. This is also a negative impact to salmon recovery in the area.
- This zoning change is opposed by both the Port Gamble and Suquamish Tribes.
- Having YMCA and Kingston Rotary involved in promoting this change seems wrong. They are not organizations that should be involved in promoting a commercial real estate developer's project and request for a zoning change.
- They are also asking for allowance of a sports complex and retail development (restaurant etc.). There are already sports fields and complexes in North Kitsap and a new sports complex in the Kingston area. It seems that this is a suggestion by the developer so that it sweetens the idea to



change the zoning when a zoning change is not needed and will incrementally increase traffic, congestion, and noise to the area.

- Kitsap County and those making decisions need to follow the Comprehensive Plan. If all areas zoned as higher density areas in the County have been developed to the maximum extent, then and only then should a zoning change be considered outside of these areas.

Commissioners, please follow the comprehensive plan and keep the zoning of this parcel the current 20-acre minimum. It will only negatively impact a currently rural area with another sprawling development that drains our already strained resources and dramatically impacts the congestion of an already strained highway corridor.

Respectfully Submitted,

Christine Brinton  
Donald Thomsen  
8480 NE Point No Point Rd  
PO Box 35  
Hansville, WA 98340

[Return to Comment Matrix](#)

Dear Kitsap County Commissioners,

I am writing to express my objection to the Raydient request to rezone their 400 acres on Bond Road and the proposed sports complex, commercial zone, and increased density housing development. This is the wrong place for a sports complex and intense development. Here are my concerns:

**Growth Management Act:** This project would create intense development in a rural area adjacent to the Port Gamble Heritage Park- disorganized sprawl that the Growth Management Act was designed to avoid. To promote responsible and sustainable growth, this type of dense project should be located in an urban setting with urban amenities. Our Rural areas are part of Kitsap's beauty and character and need to be protected. Permitting this rezone sets a bad precedent; other developers will want to follow suit and the rural area will be turned into sprawl.

**Traffic:** Traffic is already horrible. There is no sensible plan to deal with the traffic added by the sports complex, commercial zone, and additional homes outside one per 20 acres. There is no public transportation to the proposed sports complex site.

**Duplication of new sports centers:** This proposed project is 3.8 miles from the proposed Poulsbo Event and Recreation Center (PERC), and planning for that project is already underway. The city of Poulsbo opposes the rezone of the Bond Road property.

**Viability of Funding:** There is no confirmation that the sports complex can obtain funding for construction and ongoing maintenance, including wastewater discharge and road improvements. Taxpayers could end up with unsustainable tax burdens. We could end up with Raydient's wish list for housing and commercial development being built, but no way for the community to proceed on the sports complex project due to inability to fully fund the project.

**Water and Environment:** This proposed housing development, sports complex, and commercial zone would be located on a critical aquifer recharge area, near mapped fish bearing streams, and a mapped wetland- putting our local drinking water resources and watershed health at risk. A sports complex including turf fields and large amounts of parking would cause high amount of impervious surface, stormwater discharge and wastewater. For instance, the septic discharge is estimated at 100,000 gallons a day.

**Wildlife Habitat and Park environment:** The rezoning proposal would displace numerous animal populations currently living on this site. The intensity of development would degrade the habitat and outdoor experience of Port Gamble Forest Heritage Park, with neighboring lighting, car trips, and user population.

**Tribal Concerns:** Port Gamble S'Klallam Tribe opposes the Rezone on Bond Road. The Suquamish Tribe opposes the rezoning of rural protection or urban restricted parcels to more intensive uses.

**Affordable Housing Goals:** The rezone and sports complex do not help with the target for affordable housing that the County is required to meet by the GMA. The houses will only be for high income earners.

I urge you to vote against the Raydient rezone request and the proposed sports complex to keep development within the UGA as required by the GMA, protect areas of North Kitsap's rural character, discourage suburban sprawl development, minimize additional traffic congestion, and protect our natural environment, water quality and habitat.

Sincerely,  
Cindy Wilkins  
6457 NE Geneva St  
Suquamish, WA

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Dear Kitsap County Commissioners,

I am writing to express my concerns about the Raydient request to rezone their 400 acres on Bond Road and the proposed sports complex, commercial zone, and increased density housing development. This is the wrong place for a sports complex and intense development. Here are my concerns:

**Growth Management Act:** This project would create intense development in a rural area adjacent to the Port Gamble Heritage Park- disorganized sprawl that the Growth Management Act was designed to avoid. To promote responsible and sustainable growth, this type of dense project should be located in an urban setting with urban amenities. Our Rural areas are part of Kitsap's beauty and character and need to be protected. Permitting this rezone sets a bad precedent; other developers will want to follow suit and the rural area will be turned into sprawl.

**Traffic:** Traffic infrastructure already cannot handle the existing traffic. There is no sensible plan to deal with the traffic added by the sports complex, commercial zone, and additional homes outside one per 20 acres. There is no public transportation to the proposed sports complex site.

**Duplication of new sports centers:** This proposed project is 3.8 miles from the proposed Poulsbo Event and Recreation Center (PERC), and planning for that project is already underway. The city of Poulsbo opposes the rezone of the Bond Road property.

**Viability of Funding:** There is no confirmation that the sports complex can obtain funding for construction and ongoing maintenance, including wastewater discharge and road improvements. Taxpayers could end up with unsustainable tax burdens. We could end up with Raydient's wish list for housing and commercial development being built, but no way for the community to proceed on the sports complex project due to inability to fully fund the project.

**Water and Environment:** This proposed housing development, sports complex, and commercial zone would be located on a critical aquifer recharge area, near mapped fish bearing streams, and a mapped wetland- putting our local drinking water resources and watershed health at risk. I have ridden my horses on this property for the last 15 years and that hill/area is covered in springs. It would be a shame to change that delicate aquifer. A sports complex including turf fields and large amounts of parking would cause high amount of impervious surface, stormwater discharge and wastewater. For instance, the septic discharge is estimated at 100,000 gallons a day.

**Wildlife Habitat and Park environment:** The rezoning proposal would displace numerous animal populations currently living on this site. The intensity of development would degrade the habitat and outdoor experience of Port Gamble Forest Heritage Park, with neighboring lighting, car trips, and user population.

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**Affordable Housing Goals:** The rezone and sports complex do not help with the target for affordable housing that the County is required to meet by the GMA. The houses will only be for high income earners.

I urge you to vote against the Raydient rezone request and the proposed sports complex to keep development within the UGA as required by the GMA, protect areas of North Kitsap's rural character, discourage suburban sprawl development, minimize additional traffic congestion, and protect our natural environment, water quality and habitat.

Sincerely,

Lisa Salisbury, Suquamish WA 98392

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### Comments Concerning Parcel#: 032501-2-022-2003

Taxpayer Name: Mountain View Meadows LLC

Submitted by Gloria E Edwards

**Holy Cow!!** Yup this property did have cows on it; those are long gone from divorces, deaths, and sales. Finally there appears to be a plan to incorporate the parcels that had been **chosen by Kitsap County for 4 + dwelling per acre**. This property, along with others in the county was zoned 4 plus/dwellings per acre before the law suits /challenges in 2011 by the tribes and other groups. Those parcels were **chosen by Kitsap County** and it is only fair to make those parcels zoned as before; we paid some very hefty taxes for quite a few years. The only reason we knew something had changed was when we got the “lower” tax bill... the current zoning is 1 DU/5AC, and it is in the **Silverdale Urban Growth Area, Alt 2 and Alt 3**. It has water, power, Public Sewer, close to schools and is on the Bus line. It has a view of the mountains and is in a prime location close to Silverdale and Poulsbo. It is in a great location to provide housing for the growing needs in the area. Our family has owned this property for many years; currently as Mountain View Meadows LLC, we have waited long enough, it needs to be developed like the properties surrounding it.

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## Comprehensive Plan Update - Comments

### **Transportation Element**

Add to **State and regional guiding directives** for this element:

Emphasize moving people rather than vehicles through support of high-capacity transit **and non-motorized facilities**.

Add

Strategy 1.l Develop a separate Transportation Project Evaluation System specifically for non-motorized candidate projects analysis and use this process to support selection of non-motorized projects for TIP. Measure progress and produce an annual report to BOCC and public.

Add

Strategy 3d. Allocate county resources to coordinate community stakeholders to identify safety issues within school zones and implement effective solutions to increase safety in school zones.

Add

Strategy 4.g Identify community contact points in the project development review process where appropriate Community Advisory groups are required participants.

Add

Strategy 4.h Develop criteria for identifying optimum locations for shared use paths (SUPs) with input from community advisory groups (NMFCAC, ACAC, PAB) including an evaluation process for prioritizing SUP projects.

### **Put back in from current comprehensive plan:**

Transportation Policy 41. Allocate a proportion of the transportation budget for pedestrian and bicycling facilities. Rename Strategy 9.d

Transportation Policy 37. Establish standards for connectivity of bicycling and walking networks. Rename Strategy 4.i

Add

Policy regarding use of non-motorized facilities for electric devices (ebikes, scooters, wheelchairs, etc...).

[Return to Comment Matrix](#)





# KITSAP COUNTY

## Boards and Commissions

Kingston Community Advisory Council (KCAC) | [kcacchair@gmail.com](mailto:kcacchair@gmail.com)

February 15, 2024

### KCAC Members

#### At-Large

Dave Bomalaski

Tim Davis

Jorgette Glavin-Woelke

Logan Hammon

Glen Hutchinson

Kate Joncas

Cynthia Logan

Noah Williams

Alena Wolotira

#### Representing

Chris Gilbreath  
(Kingston-NK Rotary)

Genevieve Upton  
(Kingston Youth)

Glenn Malin  
(Kingston Kiwanis)

#### Ex-Officio (non-voting)

Beth Berglund (Village  
Green Foundation)

Kaili Campbell (Kingston  
Chamber of Commerce)

Breane Martinez (North  
Kitsap School District)

Louise Kernaghan  
(Friends of the Library)

Steve Heacock  
(Port of Kingston)

Marla Powers  
(Port Gamble S'Klallam)

Kitsap County Administration Building  
Commissioners' Chambers  
619 Division Street  
Port Orchard, WA 98366

Board of Commissioners  
Kitsap County Commissioner's Office  
614 Division St. MS-4  
Port Orchard, WA 98366

Planning Commission Members & Kitsap County Board of Commissioners:

In preparation for the upcoming meetings of the Planning Commission and the County Board of Commissioners, we are renewing the Environment & Land Use committee's position regarding three key decisions being considered. The Kingston Community Advisory Council (KCAC) remains in support of the committee recommendations and principles we shared in our June 2023 letter to the Board of Commissioners.

The following reflects a majority position of the Committee. To provide transparency, the vote counts associated with each of the three issues is provided and the blind details of the opinion poll are attached. We also propose a few compromises in *italic* in an effort to address some of the interests and concerns of Port of Kingston Executive Director and Commission. Each compromise proposed here was reviewed with individuals from the UVC Workgroup who remain actively involved in the 2024 Update. In all cases they were agreeable to the compromises being offered.

- **Planning Alternative Map:** By a committee vote of Ayes (5), Nays (2), Abstain (2) we prefer the Compact Growth/Urban Center Focus Kingston UGA boundary in the Alt 2 map.
- **Maximum Building Heights in the Kingston design districts:** By a committee vote of Ayes (5), Nays (2), Abstain (2) we prefer preserving the current height allowances (35'/45') in the UVC / Old Town to provide the pedestrian-focused scale and small town feel in the Old Town Design District consistent with the Kingston Design Standards. *If additional height is needed downtown, the frontage along Central Ave would be an appropriate place to allow that because of the grade/elevation.*
- **Mixed use on the ground floor:** By a committee vote of Ayes (6), Nays (3), Abstain (0) we prefer the flexibility recommended by the UVC Task Force intended to encourage new infill development. Dave Wetter's statement on the topic is attached. *To address the Port's concerns about "losing" the downtown, we recommend adding language preventing properties currently with commercial on the ground floor from backsliding and converting existing commercial to residential.*

We acknowledge that while we are not in full agreement on these issues, we all have the best interests of Kingston in mind.

Kind regards,

Kate Joncas  
KCAC Chair

Tim Davis  
KCAC Chair

\attach

[Return to Comment Matrix](#)

<https://kcowa.us/KingstonCAC>

## **Port-Proposed Kingston Storefront Zone Meeting**

*Statement prepared & read by Dave Wetter for March 28, 2023 community mtg*

2018 & 2019 Comprehensive Plan Task Force was assigned to address Reducing Barriers to Development in the Urban Village Core (UVC map purple).

**Participants:** Johnny Walker, Betsy Cooper, Jet Wolke, Jim Pivarnik, Jon Rose, Ken Hanson, Mike Brown, Rick Lanning, Beth Berglund and myself.

**Kitsap County staff:** Peter Best and Liz Williams.

A few of the major barriers to development identified were:

### **1. MIXED USE REQUIREMENT**

Every site in the UVC was zoned mixed use, the concept being, commercial on the ground floor and residential on the upper floors.

From a practical standpoint this limited the building to 3 floors or a ratio of 2 SF of residential to 1 SF of commercial. This is simply not sustainable. Our existing downtown businesses, in this town of roughly 2,500 people, were already struggling in the winter months. Forcing more commercial space into the UVC didn't make any sense.

A more sustainable ratio might be in the area of 30 SF residential to 1 SF of commercial. Bainbridge Island which has roughly 10 times the population of Kingston, has a mixed use development on Winslow Way right across the street from the ferry parking lot that was built roughly 10 years ago.

They have struggled to keep the ground floor occupied and, as of this past Sunday, they have 3 of 9 commercial spaces vacant.

Kingston simply needs more residential units to support commercial occupancy. By designating space as commercial does not make it commercially viable and/or occupied. The market, not code, determines

## **Port-Proposed Kingston Storefront Zone Meeting**

*Statement prepared & read by Dave Wetter for March 28, 2023 community mtg*

what occupies commercial space.

The Task Force suggested that mixed use should be optional in the UVC zone and not by specific site. A compromise was worked out with the staff that convertible ground floor space should be limited to eastbound 104 and Washington Avenue.

Convertible space (depending on market demand for commercial) is space that could, initially, be residential which could be later converted to commercial as needed.

Commercial space has four significant additional costs over non-commercial space. Those being higher ceilings, Fire Sprinklers, ADA access and air conditioning.

From a practical standpoint, a developer of convertible space, would likely have to, initially, build the higher ceilings and maybe some of the ADA access requirements.

The fire sprinklers, Air conditioning and some of the ADA requirements could be addressed at the time of conversion to commercial space.

If this ground floor commercial / convertible zone was to be considered for expansion, it should not be undertaken lightly, lest we, again, raise up the same barriers to development that were just removed before the pandemic.

A fact-based market study should be conducted which should include comparable populations. And, ground floor storefront space need not be the entire floor, particularly, for deeper sites and our low population.

## Port-Proposed Kingston Storefront Zone Meeting

*Statement prepared & read by Dave Wetter for March 28, 2023 community mtg*

### 2. PRESCRIPTIVE LIMITATIONS ON HOUSING TYPES

Another barrier to development was the requirement that any residential in the UVC zone need to be attached or multi-use. The Task Force advanced the argument that, as long as the density requirements are being met, the county should not dictate the type of residential style.

Let the market decide the product. This argument prevailed in the approved use table.

This brings us to the Design Standards for the Community of Kingston. (The little city by the sea) Stated Purpose (page 4 after yellow tab):

*“The purpose of the following Design Standards is to help implement the physical aspects of the Kingston community vision for downtown in the Kingston Subarea Plan. These standards are intended to promote Kingston’s small town character and support economic vitality while accommodating the impact of existing regional transportation and tourism issues. The intent is not only to provide some assurance to the community of basic conformity to the vision statement but, also to encourage creativity.”*

The Task Force supported this purpose by suggesting the developers should use their creativity to implement a performance-based, and marketable product, that fit this small town character vision, and that met the density requirements.

The developer’s solution might not be a ubiquitous and/or prescriptive 3 or 4 story rectangular block but, rather, hopefully, something more unique.

## **Port-Proposed Kingston Storefront Zone Meeting**

*Statement prepared & read by Dave Wetter for March 28, 2023 community mtg*

### **3. REQUIREMENTS PROBLEMATIC FOR SMALL PARCEL INFILL**

Another barrier to development was the UVC relatively small sites that, in addition to store frontage, and density, they also needed to accommodate parking on site and 15% landscaping.

We were able to get some parking reductions with the implementation of the High Capacity Transit Station Area. Also, by some adjacent street parking and remote parking.

Other barriers were addressed in the 2019 Comprehensive Plan Amendments ordinance and use table.

Before the Committee's work could be approved, it first had to be publicly vetted in Kingston and presented before the Board of Commissioners in a public hearing.

On 4-27-2020, the Board of Commissioners approved the Task Force final recommendations which are in the notebook I distributed.

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# Kingston Comp Plan Team Poll

(1/31/24-2/4/24)

	Do you have a strong preference about the Kingston UGA boundaries / maps?	Do you have a strong preference for max building height allowances along 104 (UVC zone / Old Town / Waterfront design districts)?	Do you have a strong opinion about buildings having commercial frontage on the ground floor?
Responder #1	Yes, I prefer the Alternative 2 Map (compact growth)	Yes, I'd like to see height limited to 35' with an additional allowance for 10 more feet with a setback so the street-side facades appear to be 35'. This could include additional height allowances on the Central Ave side of the UVC where it's open on the shoreline / parking lot side of the street.	Yes, same as the one just above but that flexibility should only be available to new buildings. Existing structures with commercial in place can't change use to residential on the ground floor.
Responder #2	Yes, I prefer the Alternative 2 Map (compact growth)	No, the maximum building height in downtown Kingston isn't a priority for me.	Yes, I want to offer flexibility for commercial use on the first floor inside the UVC as long as it's built to be convertible to commercial once Kingston has more population.
Responder #3	Yes, I prefer the Alternative 3 Map (dispersed growth)	Yes, I'd like to see height limited to 35' with an additional allowance for 10 more feet with a setback so the street-side facades appear to be 35'. This could include additional height allowances on the Central Ave side of the UVC where it's open on the shoreline / parking lot side of the street.	Yes, I want to offer flexibility for commercial use on the first floor inside the UVC as long as it's built to be convertible to commercial once Kingston has more population.
Responder #4	No. The UGA lines don't matter much to me.	Yes, I'd like to see height limited to 35' with an additional allowance for 10 more feet with a setback so the street-side facades appear to be 35'. This could include additional height allowances on the Central Ave side of the UVC where it's open on the shoreline / parking lot side of the street., Also prefer a 55' limit in the commercial district (along Hwy 104 from Banister to Lindvog.	Yes, storefronts throughout the area on the map called the Storefront Overlay should have commercial frontage.
Responder #5	No. The UGA lines don't matter much to me.	Yes, I'd like to see more height (55') allowed all along 104 from Lindvog to wherever the Shoreline Master Plan restrictions kick in.	Yes, storefronts throughout the area on the map called the Storefront Overlay should have commercial frontage.
Responder #6	Yes, I prefer the Alternative 2 Map (compact growth)	Yes, I'd like to see height limited to 35' with an additional allowance for 10 more feet with a setback so the street-side facades appear to be 35'. This could include additional height allowances on the Central Ave side of the UVC where it's open on the shoreline / parking lot side of the street., But the current height is 45 not 35 so I believe your second option has a typo	Yes, I want to offer flexibility for commercial use on the first floor inside the UVC as long as it's built to be convertible to commercial once Kingston has more population.
Responder #7	Yes, I prefer the Alternative 3 Map (dispersed growth)	Yes, I'd like to see more height (55') allowed all along 104 from Lindvog to wherever the Shoreline Master Plan restrictions kick in.	Yes, storefronts throughout the area on the map called the Storefront Overlay should have commercial frontage.
Responder #8	Yes, I prefer the Alternative 2 Map (compact growth)	No, the maximum building height in downtown Kingston isn't a priority for me.	Yes, I want to offer flexibility for commercial use on the first floor inside the UVC as long as it's built to be convertible to commercial once Kingston has more population.
Responder #9	Yes, I prefer the Alternative 2 Map (compact growth)	I would like to see 55 in a small part of the UVC along Ohio between 104 and Central and along Washington, leaving the rest of the UVC at 45. I could support 50 in the Commercial zone with setbacks to reduce prevent a tunnel effect.	Yes, I want to offer flexibility for commercial use on the first floor inside the UVC as long as it's built to be convertible to commercial once Kingston has more population.

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## Census of Agriculture

## Kitsap County

The USDA and National Agricultural Statistics Service released the 2022 Census of Agriculture. Conducted every five years, the Census offers a snapshot of farming for policy and decision makers and service providers. The Census offers insight into trends on the many facets of farm ownership, management, land use, and operations in Kitsap County. It informs Kitsap's planning and land use policies, strategies supporting farmers' economic wellbeing and farmland preservation efforts.

### Highlights:

- Between 2017 and 2022 average farm size in Kitsap increased 31% from 13 to 17 acres
- Market value of production for farmers in 2022 was \$13,573,000 – a 105% increase over 2017.
- The market value of production per farm increased 151% in five years.
- Farms with sales over \$25,000 increased 300% in five years.
- Forty-nine farms reported sales up to \$100,000 – a whopping 700% increase over 2017 when only six farms had sales at this level.
- Twenty-four farms reported sales over \$100,000.
- In 2022 average income for all farms climbed to \$23,811 –two-and-a-half times income in 2017.
- Women represent 50% of principle operators on Kitsap farms compared to 42% statewide.
- Sales of value-added products tripled in the last five years – as has the value of food sold directly to retail markets, institutions like schools, and via food hubs.
- Farms employed 463 people with a combined payroll of \$6,046,000 in 2022.
- More farmers use climate smart practices like minimal or no-tillage and cover cropping which sequester carbon.

### Lowlights:

- The number of farms in Kitsap declined 21% in the last five years from 698 to 570.
- Kitsap has lost 14,670 acres of farmland since 1997 - 61% of its total agricultural land.
- Only 18 farms over 50 acres remain in Kitsap – down from 57 large farms in 1997.
- Facing high land costs and few parcels of farmland to buy or rent, 47 young farmers left for greener pastures outside Kitsap.
- Averaging 58.8 years old, Kitsap farmers are older than the national average. Sixty-four percent of our farmers are over 55 years of age.

### Take Aways:

- Small, consistent efforts by WSU Kitsap Extension and Kitsap Conservation District in education, business planning, marketing and the economic wellbeing of local farms yielded significant dividends however, additional investments are needed.
- Demand for local farm products continues to grow as more farms sell to stores, schools, and create value-added products from their farms. Developing a “Buy Local” marketing campaign would further expand consumer demand and increase farm profitability.
- Farmland preservation and conservation efforts must stem the loss of working landscapes.
- Support for new and beginning farmers is crucial to the future of farming in Kitsap.
- Estate and transition planning for aging farmers builds bridges for young farmers seeking land.
- Decision makers need to recognize and support the contributions of local agriculture to Kitsap's economy, environmental health and food system resilience.



CITY OF  
BAINBRIDGE ISLAND

# Short Term Rentals on Bainbridge Island

May 16, 2023

# Presentation Agenda

- Review Short Term Rental Definition
- Review Current Short Term Rental Regulations on Bainbridge Island
- Review National Community Survey Results
- Present Current Short Term Rental Information
  - Units on Island
  - Business Licenses
  - Lodging Tax
- Present Common City Policy Goals for Council Consideration

# What is a Short Term Rental?

- Short Term Rental (RCW 64.37.010)
  - *Lodging use... in which a [residential dwelling unit that is owner-occupied for less than six months during the year and]... is offered to a guest...for fewer than 30 consecutive nights.*
- Bed and Breakfast (BIMC 18.36)
  - *...A single-family residence that is owner-occupied [with] (a) three or more guest rooms ...for visitors who remain no longer than two weeks,... and (b) breakfast is customarily included...*
- Hotel (BIMC 18.36)
  - *...A building(s)... containing guest rooms... for transient visitors. Short-term rental (less than 30 days at a time) of a single-family residence does not constitute a hotel.*

# Current requirements to operate a Short Term Rental

1. State Business License (RCW 19.02)
2. City Business License (BIMC 5.04)
3. State Business & Occupation Tax (RCW 82.04)
4. City Business & Occupation Tax (BIMC 5.05)
5. Lodging Tax (BIMC 3.65)
6. Primary Liability Insurance (min. \$1M) (RCW 64.37.050)
7. Collect Sales Tax (WAC 458-20-166)

# Affordable Housing Task Force Recommendation (2018)

5/9/2018

## Appendix C.8

RE: Short Term Vacation Rentals on Bainbridge Island

Members of the City Council,

The housing element of the Bainbridge Island Comprehensive Plan sets Goal HO-5 to “maintain the existing stock of affordable and rent-assisted housing, in partnership with community non-profit organizations and local and regional public and private entities.” To support this goal, the Affordable Housing Task Force recommends the adoption of an ordinance to limit the use of short-term rentals on Bainbridge Island.

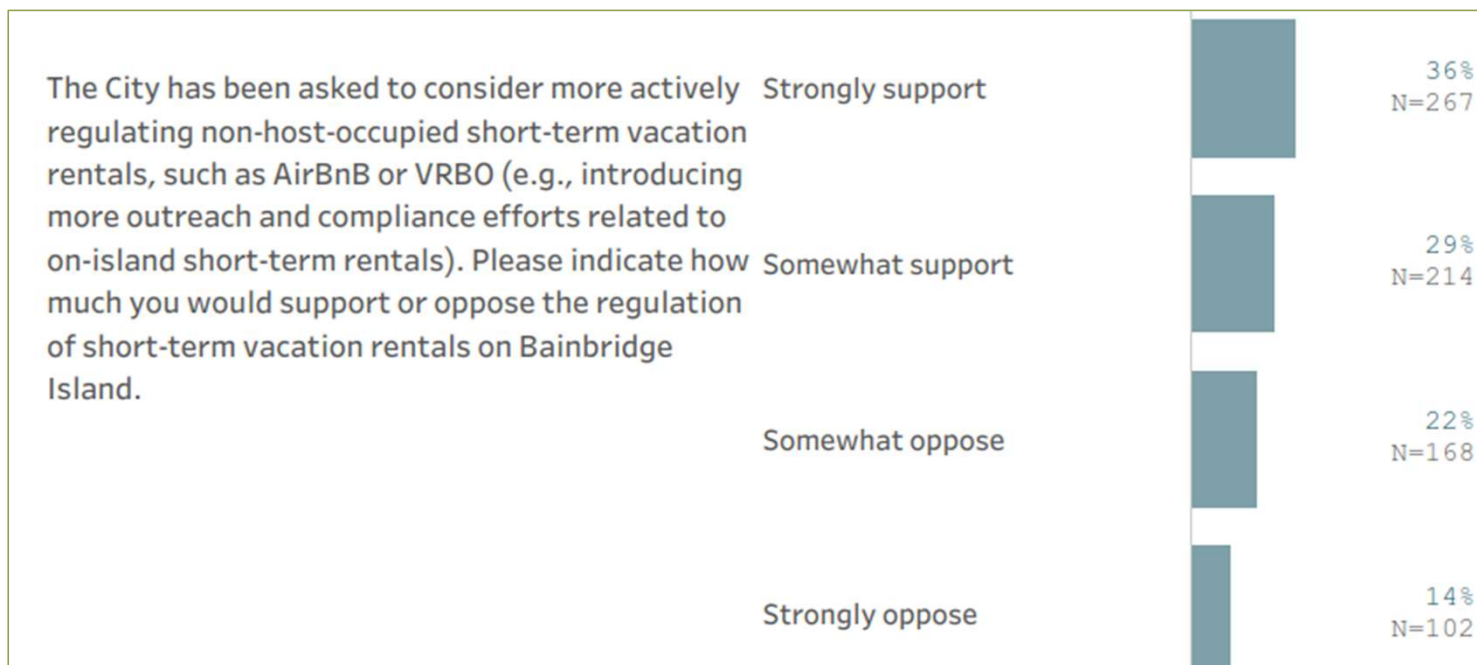
Since 2011, the third-party analytics site AirDNA (link below) has measured a 41% annual growth in the number of Airbnb rentals on Bainbridge Island, with 133 active rentals currently recorded. Of these active rentals, 114 are for the entire home, a number that represents more than three months of inventory in the current real estate market. This stranded inventory worsens the affordable housing

[https://legistarweb-production.s3.amazonaws.com/uploads/attachment/pdf/300687/Affordable\\_Housing\\_Task\\_Force\\_Final\\_Report\\_and\\_Appendices\\_072018.pdf](https://legistarweb-production.s3.amazonaws.com/uploads/attachment/pdf/300687/Affordable_Housing_Task_Force_Final_Report_and_Appendices_072018.pdf)



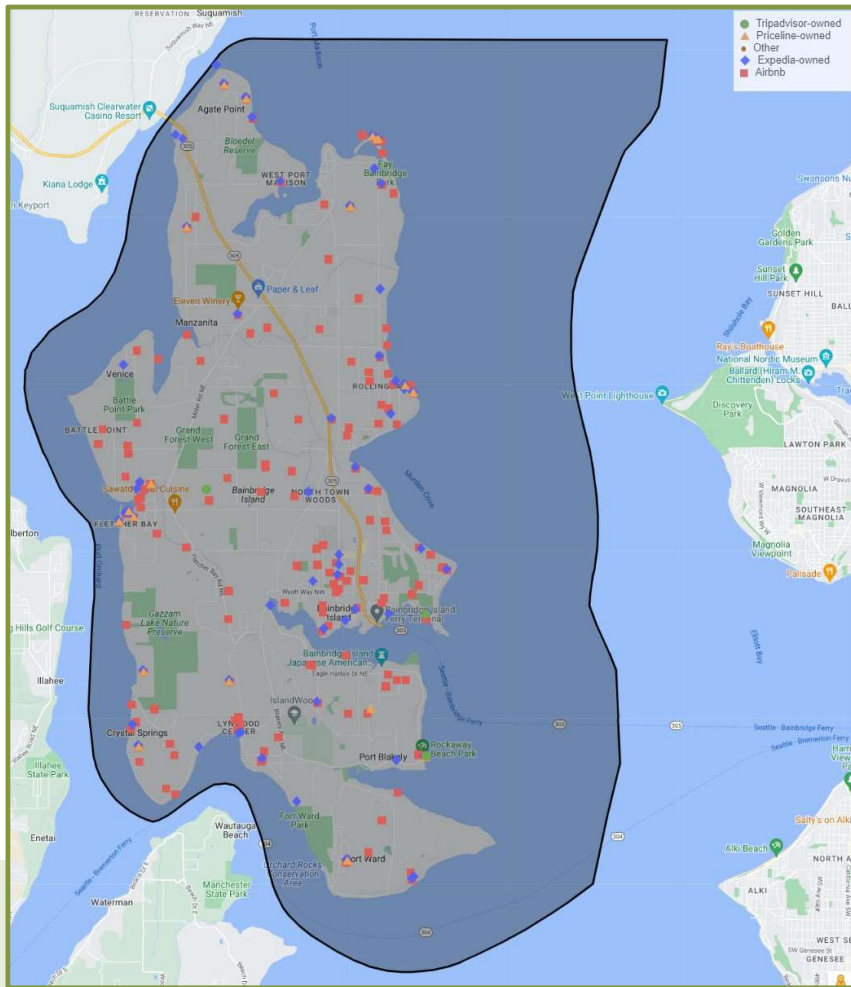


# 2022 National Community Survey Results



# How many Short Term Rentals do we have on Bainbridge?

1



- 229 Active Rentals in 2023<sup>1</sup>
  - Average Nightly Rate \$282
- Highest listing concentration areas include
  - Downtown / Winslow
  - Fletcher Bay
  - Elliot Bay Coastline
- Rental unit count on trend to achieve pre-pandemic levels by YE 2023<sup>2</sup>

<sup>1</sup>Granicus (email communication, 04-28-2023) [Data Set] (02-09-2023)

<sup>2</sup>AIRDNA (03-27-2023). AIRDNA MARKETMINDER (Bainbridge Island, WA; Version 14.3.3) [Data Set]. <https://www.airdna.co/vacation-rental-data/app/us/washington/bainbridge-island/overview>

# Short Term Rental Business Licenses on Bainbridge Island

- Approx. 100 Active City Business Licenses for Short Term Rentals
- Business Licenses are issued through the State Department of Revenue



# Lodging Tax on Bainbridge Island

- Current Lodging Tax revenue ~\$350k/year
- The Lodging Tax Advisory Committee (LTAC) can use these funds to
  - Support downtown businesses
  - Encourage tourism
  - Repay bonds issued for affordable housing within a half-mile of a transit station

# Common Short Term Rental Policy Goals

- Prevent the loss of rental housing stock
- Preserve the residential quality of neighborhoods
- Capture tax revenue
- Allow economic gain for residents
- Support tourism in a balanced way
- Ensure health and safety for guests and residents
- Prevent competition with traditional lodging establishments
- Balance the needs and rights of property owners
- Slow or prevent the proliferation of short term rentals

# Potential Next Steps

1. Maintain current approach regarding short term rentals on Bainbridge Island
2. Provide direction to the City Manager regarding Short Term Vacation Rental policy goals



Rural comprehensive plan amendments and upzones that increase rural population capacity in Kitsap County violate the Growth Management Act and will harm the environment.

The Growth Management Act requires counties to comply with the Puget Sound Regional Council Multicounty Planning Policies.<sup>1</sup> Multicounty Planning Policy MPP-RGS-14 directs Kitsap County, and all of the Central Puget Sound counties, to “[m]anage and reduce rural growth rates over time, consistent with the Regional Growth Strategy, to maintain rural landscapes and lifestyles and protect resource lands and the environment.”<sup>2</sup> The Regional Growth Strategy adopted rural population growth target of 8 percent of the county’s total population growth or 8,000 people for Kitsap County.<sup>3</sup> On a percentage basis, this is the highest rural growth population growth target of the four Central Puget County counties.<sup>4</sup> Kitsap County’s Buildable Lands Report documents that in 2013 through 2019, 29 percent of the county’s population growth occurred in the rural area.<sup>5</sup> While this was an improvement over the past years, it shows that Kitsap County faces significant challenges in crafting a comprehensive plan and development regulations that comply with the Regional Growth Strategy.<sup>6</sup>

The County’s own data makes clear that the one thing Kitsap County should not do is increase rural development capacity. The Olympic Property Group/Raydient proposal to rezone land from one dwelling unit per 20-acre zoning to one dwelling unit per five acres is the opposite of what the Regional Growth Strategy requires because it will increase rural population capacity and rural growth rates. This rezone is illegal.

The Regional Growth Strategy limits rural growth to retain important cultural, economic, and rural lifestyle opportunities; to protect the environment including

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<sup>1</sup> *Stickney v. Cent. Puget Sound Growth Mgmt. Hearings Bd.*, 11 Wn. App. 2d 228, 244 – 45, 453 P.3d 25, 34 (2019).

<sup>2</sup> Puget Sound Regional Council, *Vision 2050: A Plan for the Central Puget Sound Region* p. 43 (Oct. 2020) and last accessed on Nov. 28, 2023, at: <https://www.psrc.org/planning-2050/vision-2050>.

<sup>3</sup> *Id.* at p. 30.

<sup>4</sup> *Id.*

<sup>5</sup> *Buildable Lands Report Kitsap County, Washington Final* p. 18 (Nov. 2021) last accessed on Nov. 11, 2023, at:

[https://www.kitsapgov.com/dcd/PEP%20Documents/FINAL%20Buildable%20Lands%20Report\\_November%202021.pdf](https://www.kitsapgov.com/dcd/PEP%20Documents/FINAL%20Buildable%20Lands%20Report_November%202021.pdf).

<sup>6</sup> *Id.* p. 19.

reducing greenhouse gas pollution; and to reduce the costs of transportation facilities.<sup>7</sup> So there are important policies behind the numbers.

<https://futurewiseorg.sharepoint.com/Shared Documents/Planning/Comment Letters/Comp Plans & DRs/Kitsap County/Rural comp plan amends and upzones that increase rural population capacity violate the GMA.docx>

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<sup>7</sup> Puget Sound Regional Council, *Vision 2050: A Plan for the Central Puget Sound Region* p. 23 – 24, p. 37, p. 43 (Oct. 2020).

# Forest Restoration Tool Box Ideas

By: John Willett 12/2023

## Forest Restoration in Kitsap County Comp Plan for 2024

1. Small Wetlands, under 1 acre Wetland in Clear Cut Regulations, should be updated to current science so as to protect "linked" (small wetlands in any logging operation) Wetlands through surface or subsurface drainage and /or habitat vegetation. This should match up with current building code regulations for wetlands in Kitsap County.
2. Legacy Trees in all Clear Cuts should be retained for habitat and reforestation.
  - a. Legacy trees could be cut if the tree stand already contains 20% or more legacy Trees.
  - b. No stand should contain less than 20% Legacy Trees.
  - c. Property taxes decrease in a sliding scale as to percentage of Legacy Trees on Property.
3. Tree Farm taxes increase from current taxation rate for unsustainably managed property
4. Tax incentives for Tree Farms that selective log and are certified sustainable by DNR. Property taxes decrease in a sliding scale as to how many trees are left standing after logging operation.
5. Incentives for Commercial Hemp Production. 70% of all paper was produced from Hemp until 1930s. That paper production is mostly from trees, now.

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Christine Rolfes  
County Commissioner District 1  
Kitsap County Commissioner's Office  
614 Division St. MS - 4  
Port Orchard, WA 98366

July 2, 2023

Dear Christine,

We are writing to express our concerns and ask for your support regarding two related issues:

- 1) The rezoning request application in the 2024 Comp Plan for approximately 400 acres bounded by Stottlemeyer, Bond and Port Gamble Roads and the Port Gamble forest.
- 2) The Sports Complex "concept" being promoted by Raydient.

As Kingston residents along Highway 104 and Port Gamble Rd NE, we are within walking distance of the proposed sports complex. We're concerned about the impact on our neighborhood of increased traffic, nighttime ambience, ground water, wildlife support, environmental impact, and the switch from the Kitsap Comprehensive Plan. We urge you to continue to support your Kitsap Comprehensive Plan instead of rezoning it.

#### **Issue 1) 2024 Comprehensive Plan Re-zoning Application #72**

Simply, application 72 - Rural Wooded to Rural Residential/Commercial violates the Kitsap Comprehensive Plan (see attached map) and the zoning regulations. This would allow up to 80 houses on the property. Aside from the environmental impact, the junctions of Bond Road, Stottlemeyer and Port Gamble Road are already dangerous. Adding more vehicle traffic would require substantial road improvements to make this area safe.

All properties surrounding these parcels are zoned as either Rural Wooded (1 dwelling/20 acres) or Rural Protection (1 dwelling/10 acres).

Per 17.100.040 any re-zoning should have a density no greater than Rural Protection (1 dwelling/10 acres)

#### **17.100.040 Allowed uses.**

*Except as provided in Chapter 17.520, when a use is not specifically listed in this title, it shall be understood that the **use may be allowed if it is determined by the director that the use is similar to other uses listed.** It is further recognized that every conceivable use cannot be identified. In anticipation that new uses will evolve over time, this section establishes the director's authority to compare a proposed use and measure it against those listed in this title for determining similarity. In determining similarity, as well as when considering all other uses, the director shall make all of the following findings:*

**A. The proposed use shall meet the intent of, and be consistent with the goals, objectives and policies of the Kitsap County Comprehensive Plan;**

**B. The proposed use shall meet the stated purpose and general intent of the Comprehensive Plan land use designation and zoning classification in which the use is proposed to be located;**

**C. The proposed use shall not adversely impact the public health, safety and general welfare of the residents of the county; and**

***D. The proposed use shall share characteristics in common with, and not be of greater intensity, density or generate more environmental impact than, those uses listed in the land use zone in which it is to be located.***

## **Issue 2) Sports Complex Concept**

To be clear, we recognize the need for additional sports facilities and do not “hate children” as Jon Rose from Raydient suggested at the June 27th meeting. However, if re-zoning to Rural Residential violates the Kitsap Comprehensive Plan as indicated above, adding sports fields, a swimming pool and restaurants to the property under discussion further violates the county plans.

The county plan calls for rural development and zoning in this area. The Port Gamble Heritage Forest was **purchased** from Pope (now Raynier/Raydient) to provide green space, protect the wildlife and environment as well as protecting the Gamble Creek salmon stream and Gamble Bay water quality. How can putting a housing development and sports complex right next to the Forest be good??

We also fear that the process that Raydient is following is a not-so-subtle attempt to circumvent the planning process, despite Jon’s repeated assurances of transparency.

They have already applied for a zoning variance to higher density. They are now gathering public support for a “whatever you want, you get” sports complex concept.

We suspect that when plans are finalized, Raydient will “discover” that selling the land for the complex isn’t financially profitable unless they are able to increase housing density in the remainder of the property.

You and the other County Commissioners will be under extreme pressure to approve the variance.

Then, Arborwood II will be built on the southern end of the Port Gamble forest, and the sports complex land will sit waiting for the Rotary and YMCA to get sufficient public donations to build the complex.

When and if the complex is built, someone will have to maintain it and we suspect that the burden will fall on the county and hence the taxpayers.

The same comments regarding the road safety apply but are more serious because of the increase in traffic volume.

Further, we understand from Kitsap Parks Department that the County owns 11,500 acres of land – 60% or nearly 7000 acres of which is in North Kitsap. Also, according to the Parks Department, no one has approached them recently about finding a suitable site for sports and recreation facilities. As the County will likely end up managing these facilities it would seem to make use of existing County resources.

An additional concern is the lack of transparency from Raydient. We have an email from Jon Rose stating that there will be no more than 1 dwelling/5 acres in the development - 80 houses - yet at the June 27th meeting he flashed up a slide showing “cluster development” 20 houses on 1 acre lots. Raydient need to be clear and open regarding their plans.

In summary, we believe that the County should stick to its plans for zoning and land use and reject the current application for zoning variances for these parcels. Alternate solutions for additional sports facilities should be pursued - there is clearly a need. But we should not be manipulated into changing the land use plans for the sake of a developer's profits.



Rob Salthouse  
26371 Port Gamble Rd NE  
Kingston



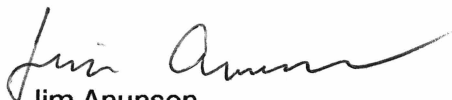
Robin Salthouse  
26371 Port Gamble Rd NE  
Kingston



Elisa Rogers  
26409 Port Gamble Rd NE  
Kingston



Daniel J. Richcreek  
26409 Port Gamble Rd NE  
Kingston



Jim Anunson  
26418 Port Gamble Rd NE  
Kingston



Linda Anunson  
26418 Port Gamble Rd NE  
Kingston



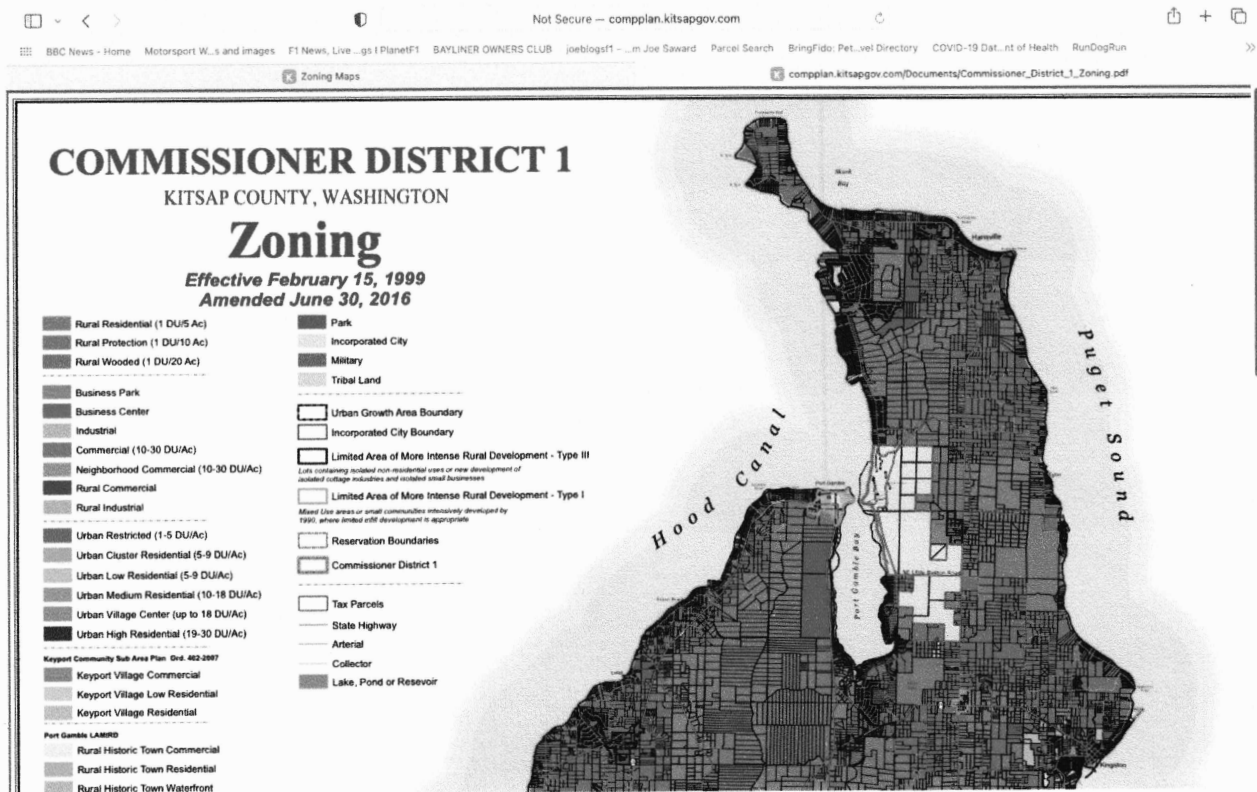
Julie Turner  
28602 St Hwy 104  
Kingston



Debbie Cole  
26476 Port Gamble Rd NE  
Kingston

cc: County Commissioners Charlotte Garradio (District 2), Katie Walters (District 3)





[Return to Comment Matrix](#)

# SAVE ENETAI

*"The Cheney Estate - Enetai Community is approximately 100 acres of primary wildlife habitat"  
- Illahee Community Plan*

## URBAN GROWTH BOUNDARY UGA'S

**Kitsap County should follow it's Regional Growth Priorities & Policies:** put housing in already existing high-density areas with transportation, affordable housing ie: multi-family housing, walk/bike planning.

**REDUCE not EXPAND UGA'S:** Current Land Resources should be effectively utilized for any land use activity before expanding boundaries.

**BUILDABLE AREAS:** Don't put unbuildable areas in UGA's.

**PRIMARY AREAS OF CONCERN FOR PLANNING COMMISSION:** Preserve Natural Habitats & Biodiversity. Don't put Natural Habitats with significant biodiversity in UGA's without a Protection/Conservation Plan.

**CLIMATE CHANGE:** Dense Tree Canopies, especially next to urban areas are an important tool for combating climate changes. Preserving old growth forests with significant biodiversity should be a PRIORITY. Trees can regrow but the biodiversity can NEVER be replaced. Once it is gone, it is gone forever.

**ILLAHEE COMMUNITY PLAN (ICP)** was adopted in 2008 and incorporated into the Comprehensive Plan. It outlines the connectivity of (3) Forest Patches: Illahee Preserve, Illahee State Park & the Cheney Estate-Enetai Community that includes a salmon-bearing Enetai Creek.

**ILLAHEE - ENETAI** is an area that is a contiguous bio-diverse natural habitat considered "high priority wildlife habit" by WDFW. It should not be disrupted.

**2008/2016 COMPREHENSIVE PLAN:** As part of ICP / Comp Plan Update, In 2008, Illahee did an area-wide rezone from Urban Low (5-9) to Restricted (1-5) primarily because of the steep terrain and unstable soils that could not support higher density housing. As part of the 2016 Comp plan Update, (as contemplated in the 2008 Comp Plan) there was an area-wide rezone to Urban Restricted in ENETAI.

Just weeks prior to adopting the 2016 Comprehensive Plan, your predecessors made an ill-informed decision that excluded (2) parcels (now proposed Fisher Plat area) in Enetai from being rezoned to Urban Restricted. This was an error of omission as important information was not made available to the PC at the time. Staff supported exclusion to the Planning Commission ignored the **ICP** that included the Cheney Estate-Enetai Community and the purpose for the area-wide rezoning. The UL designation is not compatible with the area. We request this error be corrected.

**ROZEWOOD ESTATES:** The entire southern boundary of Rozewood Estates runs along Enetai Creek which shares headwaters with Illahee Creek to the north of Sylvan Way. This is a wildlife corridor. Rozewood Estates requests the ZONING be reduced for ALL of remaining Rozewood Estates.

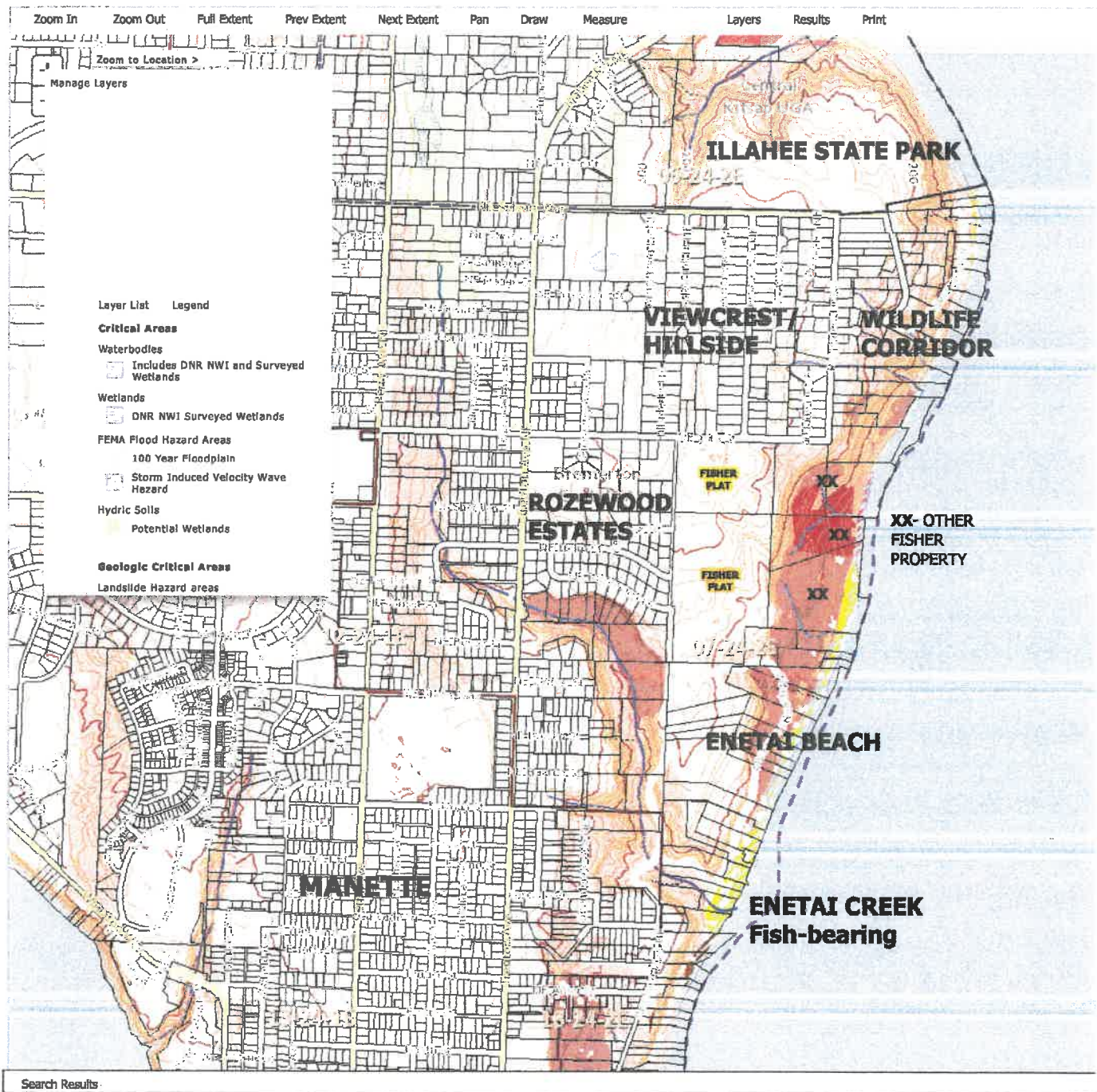
SAVE ENETAI requests remaining CHENEY ESTATE-ENETAI COMMUNITY be designated a **"WILDLIFE & NATURAL HABITAT CONSERVATION AREA"**





2811 NE ROZEWOOD DR

Contact GIS | Disclaimer | Help

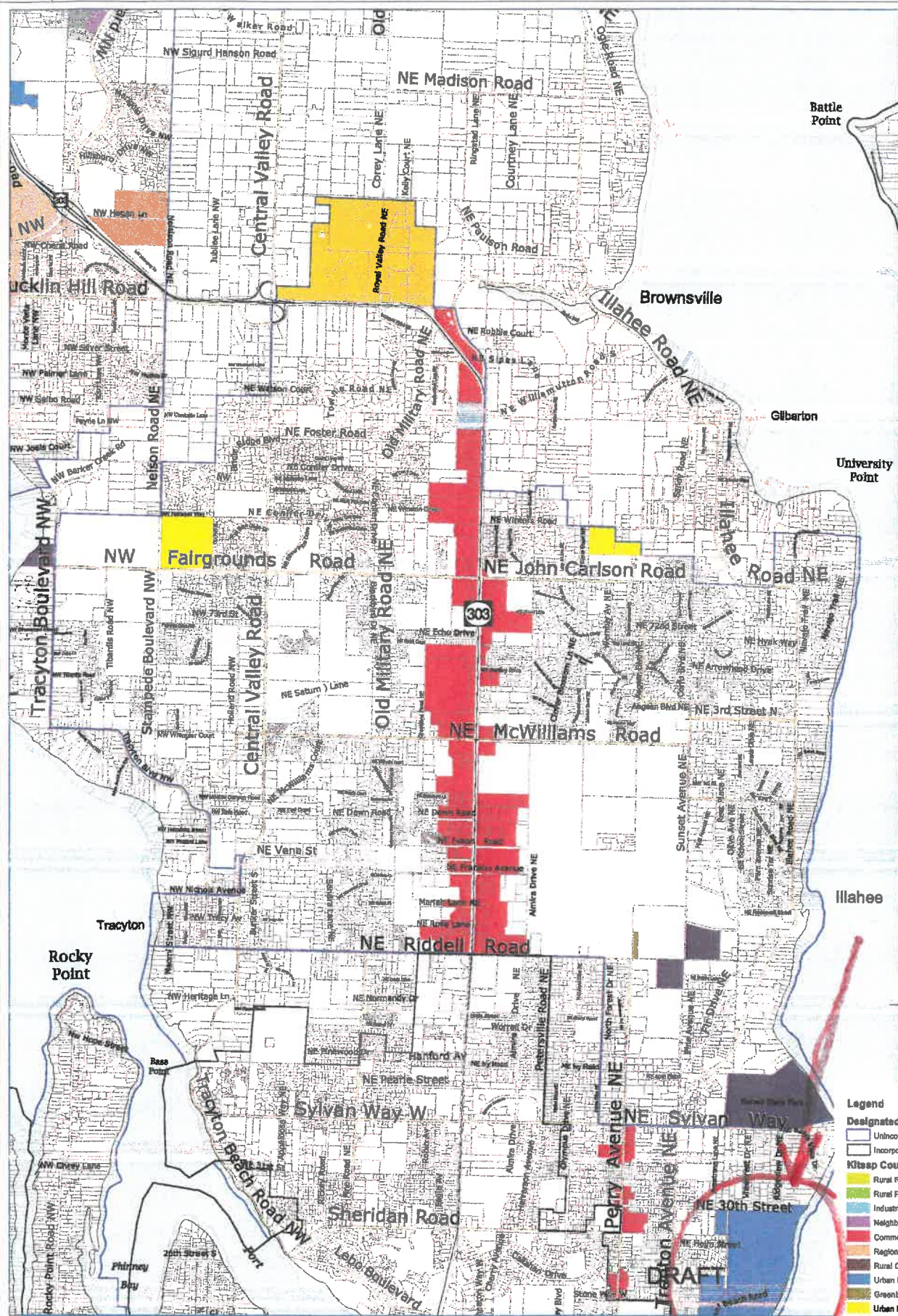


## LOCATION MAP - EXHIBIT A





# Central Kitsap 2016 Preferred Alternative - Zoning Changes



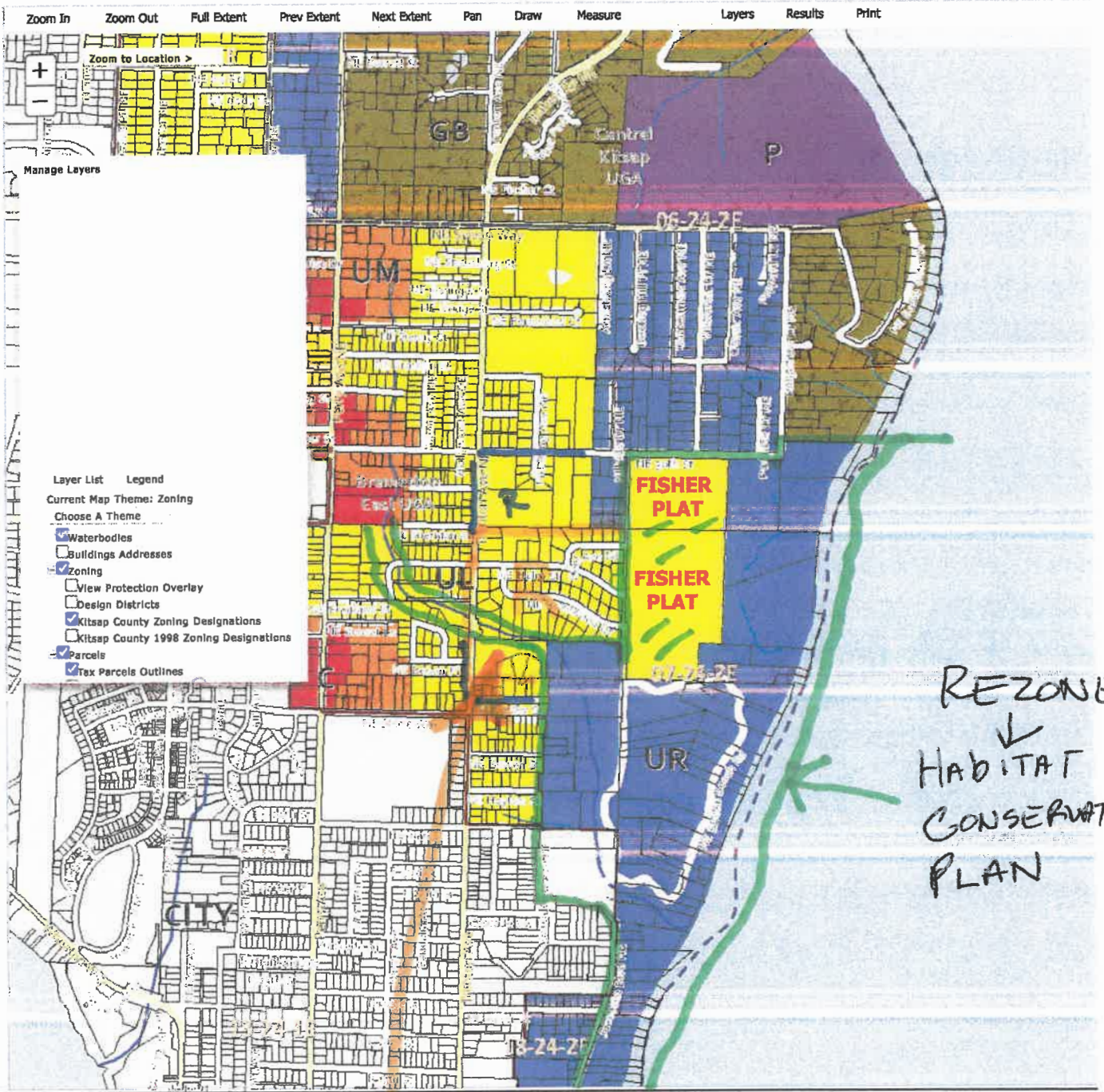
- Legend**
- Designated Urban Growth Areas**
- Unincorporated Urban Growth Area
  - Incorporated City
- Kitsap County Zoning Designations**
- Rural Residential (1 DU/5 Ac)
  - Rural Protection (1 DU/10 Ac)
  - Industrial
  - Neighborhood Commercial (10-30 DU/Ac)
  - Commercial (10-30 DU/Ac)
  - Regional Center (10-30 DU/Ac)
  - Rural Commercial
  - Urban Restricted (1-5 DU/Ac)
  - Greenbelt (1-4 DU/Ac)
  - Urban Low Residential (5-9 DU/Ac)
  - Urban Cluster Residential (5-9 DU/Ac)
  - Urban Medium Residential (10-18 DU/Ac)
  - Urban High Residential (19-30 DU/Ac)
  - Park
  - Incorporated City

**Kitsap County Department of Community Development**  
614 Division Street, MS-36, Port Orchard, Washington 98366  
VOICE (360) 337-5777 • FAX (360) 337-4925

This map was prepared from existing map materials, not from field surveys. Users of this map should be aware that the responsibility for understanding the meaning and implications of this map remains with the user. The information on this map may have been collected from various sources and does not constitute a warranty. While great care was taken in making this map, there is no representation or warranty of its accuracy, including, without limitation, any geographic features shown. This map is intended for informational purposes only and is not a substitute for field survey. Kitsap County and its officials and employees assume no responsibility for any liability for the accuracy, completeness, reliability, or timeliness of any information on this map.

ENETA 1 REZONE Published March 8, 2016





REZONE  
↓  
HABITAT  
CONSERVATION  
PLAN

 SUGGESTER ↓ RESTRICTED

R- ROZEWOOD ESTATES  
DOWN ZONE ↓  
RESTRICTED



# ILLAHEE COMMUNITY PLAN



**Figure 4.7 Illahee Community WDFW Habitat Evaluation**



### **Wildlife Habitat Patches**

This Plan defines “Wildlife Habitat Patches” as significant wildlife habitat areas where significant acreage and quality habitat support a variety of wildlife species. Two major wildlife patches exist within the Illahee community boundaries, and the third wildlife patch, the Cheney Estate—Enetai community area, is contiguous to the Illahee community.

The largest of the Wildlife Habitat Patches is located in the Illahee Preserve. The Preserve is presently 460 acres and has been designated as a primary wildlife preserve conservation habitat area, as designated by the Department of Fish and Wildlife. The wildlife preserve area is comprised of old growth forest and a significant portion of Illahee Creek watershed in its natural state. This represents a premium wildlife habitat area that was recently expanded from 352 acres to the current 460 acres, with plans to further increase the preserve boundaries via conservation easements and land purchases.

The next largest Wildlife Habitat Patch in Illahee is the 75-acre Illahee State Park. This shoreline park with approximately one-half mile of waterfront is heavily forested and is a sanctuary for both marine and terrestrial wildlife.

The Cheney Estate—Enetai Community is a third Wildlife Habitat Patch of approximately 100 acres of primary wildlife habitat immediately south of the Illahee community’s southern border. The area is heavily forested with minimal development along the nearly one linear mile of shoreline. Discussions with community and estate personnel indicate it is highly unlikely the area will be developed beyond its present state. This area also has the highest available WDFW habitat rating in the countywide habitat assessment.

### **Wildlife Corridors**

The wildlife within these three Wildlife Habitat Patches are prone to species isolation unless they can be in contact or connected with other patches. This is less of a problem for birds that can fly between other patch areas. It is a larger problem for terrestrial mammals that must traverse overland to reach other wildlife patches.

Wildlife Corridors provide safe paths, free of vehicles and other human disturbance, for wildlife to travel between areas used for sleeping, accessing drinking water, foraging or hunting, and

breeding. Wildlife corridors can range in quality from high to low depending on the obstacles encountered. Lower quality paths are encumbered by more private residences, roadways, and other obstacles that tend to interfere, but not deter, the movement of wildlife. Every consideration must be made to maintain the tree canopy that will provide some kind of continuity for wildlife migration.

Four Wildlife Corridors already exist in the Illahee community and connect the three Wildlife Habitat Patches, i.e., the Illahee Preserve, Illahee State Park, and the Cheney Estate–Enetai community area (Figure 4.8).

The first is a corridor already used by wildlife and links Illahee State Park with the Cheney Estate–Enetai Community. With the near build-out of this corridor area in the 1980s as semi-rural and the fact that there is little vehicle traffic in the area, this Wildlife Corridor functions well to provide movement of wildlife between the two Wildlife Habitat Patches. Because of the natural features in the area, the Illahee community requested the designated housing density for this area to be changed from an Urban Low designation (5-9 housing units per acre) to an Urban Restricted designation (1-5 housing units per acre). The lower density housing designation is more compatible with the natural features of the area and lower densities support the continuation of this already established wildlife corridor. The requested lower zoning changes were agreed upon by the Planning Commission and the Board of County Commissioners and were included in the 2006 Comprehensive Plan Update.

The next Wildlife Corridor already in use connects Illahee State Park with the forested area along the South Fork of Illahee Creek. The Wildlife Corridor runs northwest along the ravine from the State Park boundary, through the Fisher Park area, across Illahee Road, and then directly west across several private properties to the recently acquired Kitsap County Parks property. This area, like the previous area, was approved for the Urban Restricted zoning designation.

The third Wildlife Corridor connects two pieces of Kitsap County Parks Department properties that are part of the Illahee Preserve. The Illahee Preserve Stewardship Committee identified a number of properties along the Illahee Creek corridor that were targeted for purchase or conservation easements. These two properties, or portions thereof, were not secured by previous grants and are being targeted with future grants. Portions of both properties are

considered essential for maintaining a viable Wildlife Corridor in that area.

The fourth Wildlife Corridor also connects Illahee State Park with the natural areas to the north, which are all private but not developed primarily because of the steep slopes along both sides of Illahee hill. This corridor extends upland toward the Fir Drive area and also northward along the shoreline, both of which terminate along the Illahee Creek corridor. The housing density in this area was changed from Urban Low to Urban Restricted based on the natural features of the area. As stated in the previous paragraphs, the lower housing density also supports the already existing wildlife corridors in these areas.

#### **Habitat Standards for Wildlife Habitat Patches and Wildlife Corridors**

As stated earlier, the protection of fish and wildlife resources and habitat within the Illahee borders is ultimately the responsibility of the Illahee community. While the two Wildlife Habitat Patches within Illahee are publicly owned, the Wildlife Corridors are primarily in private ownership, and the success of maintaining the habitat quality will depend on the voluntary actions of Illahee landowners.

There are varying habitat standards for Wildlife Habitat Patches and Wildlife Corridors that are only briefly mentioned in this Plan. The first is to maintain the natural features to the maximum extent possible such as wetlands and streams. The second is to maintain natural vegetation as much as is possible such as native trees, shrubs, and plants. The last is to avoid barriers such as solid fences, etc., to the maximum degree possible.



HELP

# SAVE ENETAI



*“The Cheney Estate - Enetai Community is approximately 100 acres of primary wildlife habitat” - Illabe Community Plan*

SAVE ENETAI -2811 Rozewood Dr., Bremerton, WA 98310  
Tours Welcome! Call 805-637-8610 or go to [saveenetai.org](http://saveenetai.org)

PRESORTED STANDARD  
U.S. POSTAGE PAID  
2EVERYDOOR  
ECRWSS

LOCAL  
POSTAL CUSTOMER

The "Cheney Estate - Enetai Community" is heavily wooded with minimal development along one linear mile of shoreline with a majestic view of Bainbridge Island. It is a WDFW designated "wildlife forest patch" connected to Illahee State Park by a wildlife corridor. The patch contains a watershed, spring, salmon stream, bald eagles, and historic old mill site.

The 65-acre Cheney Estate was sold to developers, John & Shawna Fisher whom are proposing the "Fisher Plat"- 189 homes on 37-acres. This would result in the destruction of old growth forest & high priority wildlife habitat.

We **URGENTLY** need your financial support to continue our conservation efforts which include hiring environmental experts and legal representation needed to make sure SEPA is enforced and Critical Areas are protected.



[saveenetai.org](http://saveenetai.org) / facebook  
DONATE NOW at GO FUND ME

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## Input West Sound Cycling Club regarding the Kitsap County Comprehensive Plan

February 22, 2024

### 1. IMPROVE SAFETY FOR BIKES

- Define a bike facility based on WSDOT recommendations. Bike lanes, buffered bike lanes, protected bike lanes, etc. A shoulder is not a bike facility according to WSDOT and USDOT. It does not have a clear definition that makes the presence of "paved shoulder" useful information for bicyclists. Show diagram.
- Measure success of multi-modal using clear definitions and objective performance measures - ie WSDOT bike facilities - annually
- Separate funding for multi-modal from roads projects in the TIPS process
- Analyze and improve the TIPS process so that it is balanced, and not so car centric.
- Actively seek grants for multi-modal projects

### 2. Multi-modal Projects

- North/South safe bike facility (designated space for bicycles using WSDOT definitions) from Pierce County border to Poulsbo, which would connect with the STO trail
- Commissioners should prioritize north/south safe bike route to establish a spine that all neighborhoods can connect to.
- J to K trail paved trail for commuting, recreating, and emergency management
- Kitsap Lake Loop: County portion is the south part of West Kitsap Lake Road and the south end of Price road,
- Sound to Olympics Trail (Bainbridge Island to Poulsbo to Port Gamble and on to the Hood Canal Bridge). This is included in the scope of the RAISE grant.
- A 7 mile connector to the above: North Sound to Olympics Trail (Kingston to STO, connect at Port Gamble Heritage Park). This is included in the scope of the RAISE grant.
- Traffic calming research and recommendations for Beach Drive, Chico Way, and Tracyton Blvd.
- Upgrade Kitsap County Non-Motorized Plan to prioritize projects that connect to the 4 cities. Recent County documents show unincorporated Kitsap County non-motorized facilities without prioritizing linkage to existing facilities in the four cities. The County and the four cities should be working collaboratively for these linkages to create a useable bike network.



# Levels of Safety for Bikes

The graphic below is from the National Highway Institute Course on Bicycle Facility Design, and clarifies what is and isn't a bike facility according to USDOT and WSDOT. Bike Facility types are shown, left to right, from safest to least protected.



The term “Bicycle Facility”, as defined above, is immensely useful to cyclists in choosing safe routes. Any bicycle facility will have a consistent, signed, designated space for the preferential or exclusive use of bicyclists. No such guarantee exists riding on a paved road shoulder, which can begin, end or narrow suddenly without warning, or be on only *one* side of a road.

Bicycle planning and data collection efforts should be relevant to ***cyclists*** who are concerned with consistency, connectivity, and safety. Bike maps should convey this safety information by depicting existing WSDOT-defined bike facilities.



# kitsap 2044

Comprehensive Plan Update Comment Card

NAME

Roger Gray

EMAIL

This was very informative  
For those in UGA's. Living  
Outside UGA's in Rural Kitsap it  
would have been ~~at~~ nice to see  
a Complete Kitsap County map  
with the options.

For further comments or questions please email: [compplan@kitsap.gov](mailto:compplan@kitsap.gov)

[Return to Comment Matrix](#)













[Return to Comment Matrix](#)

February 17, 2024

Kitsap County Board of Commissioners  
619 Division St. 4th Floor  
Port Orchard, WA 98366

**RE: North Kitsap YMCA Development Endorsement**

Dear Christine Rolfes, Charlotte Garrido, Katie Walters:

Although our family homes are located in greater Poulsbo, we live in Silverdale...

We, the undersigned families, wholeheartedly endorse the initiative to bring a YMCA with a pool and sports fields to North Kitsap. The absence of family-friendly indoor facilities within Kingston, Hansville, Port Gamble, and the surrounding areas, aside from weather-dependent outdoor parks, leaves our children with no viable options for indoor extracurricular activities such as swimming, rock climbing, trampoline parks, basketball, and gymnastics within our 'home' community. We know first-hand why North Kitsap is struggling to attract new families and see a material decline in public school enrollment despite our growing population.

While we cherish the rural ambiance of North Kitsap, we firmly believe that destinations like Port Gamble Heritage Park and the rest of the surrounding woodlands adequately preserve this cherished aspect of our community.

The environmental ramifications of our frequent trips to Silverdale for our children's activities and our own personal fitness is undeniable. **Each roundtrip journey from Kingston averages 40 miles -- equating to ~480 miles per month.** See Appendix A for Google Map.<sup>1</sup> This puts substantial strain on our finances, especially during times of inflation, and exacerbates greenhouse gas emissions, thereby burdening both our families and the environment.

Given that some of our children attend Title 1 schools (i.e., Choice Academy/NKOA, David Wolfe Elementary, Kingston High School, Kingston Middle School, Richard Gordon Elementary, and Suquamish Elementary<sup>2</sup>), where 40% or more of students are from low-income families, we lend our unwavering support to the necessary approval for rezoning 20-acre lots into smaller ones. This transformative step would not only provide more affordable housing options but also better cater to the socioeconomic needs to attract and retain families seeking to purchase their first home.

Addressing traffic concerns is paramount, and we view it as a positive reflection of community engagement with the proposed facilities. Strategically positioning facilities like the proposed YMCA on Bond Road holds the promise of alleviating traffic congestion, particularly at the intersection of Bond and Highway 305, to the benefit of the northernmost Kitsap residents.

The YMCA's comprehensive feasibility study corroborates Bond Road as the optimal location, factoring in community needs, demographics, and the mitigation of competition with their existing Silverdale facility, situated approximately 8 miles away from Poulsbo.<sup>3</sup> See Appendix B for the June 2023 YMCA's North Kitsap / Poulsbo Market Study.

In summary, the establishment of a YMCA and ball fields in North Kitsap not only addresses our immediate needs for family-oriented indoor facilities but also holds the potential to alleviate socioeconomic disparities, reduce environmental impact, and enhance community well-being for generations to come. We respectfully urge you to consider your county's families and children to support this vital endeavor for the betterment of our beloved North Kitsap community.

With hope for our families' futures,  
**The Undersigned North Kitsap Families**


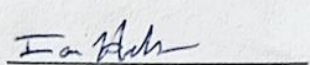

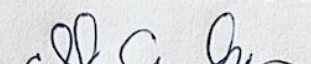

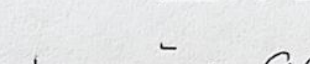

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<sup>1</sup> Google Maps: [Kingston, WA to Haselwood Family YMCA](#)

<sup>2</sup> North Kitsap School District Website: <https://www.nkschools.org/programs-and-services/title-i-lap>


<sup>3</sup> June 2023: [YMCA North Kitsap / Poulsbo Market Study \(conducted by Triangle2\)](#)



 Signature The Ilgen Family Family Name Number of Kids <u>2</u>   Ages <u>3, 6</u>	 Signature The Horkanson Family Family Name Number of Kids <u>3</u>   Ages <u>10, 9, 5</u>	 Signature The Black Family Family Name Number of Kids <u>2</u>   Ages <u>5, 6</u>
 Signature The Graham Family Family Name Number of Kids <u>2</u>   Ages <u>3, 6</u>	 Signature The D'Connors Family Family Name Number of Kids _____   Ages _____	 Signature Gaines Family Family Name Number of Kids <u>2</u>   Ages <u>6/1</u>
 Signature The Sullivan Family Family Name Number of Kids <u>2</u>   Ages <u>3, 6</u>	_____ Signature _____ Family Name Number of Kids _____   Ages _____	_____ Signature _____ Family Name Number of Kids _____   Ages _____

### Petition Letter Link:

[https://docs.google.com/document/d/1LI5VuArnLqZTCwpLLiQ\\_msRGi7Z9Ancs/edit?usp=sharing&oid=101085050226411259837&rtfpof=true&sd=true](https://docs.google.com/document/d/1LI5VuArnLqZTCwpLLiQ_msRGi7Z9Ancs/edit?usp=sharing&oid=101085050226411259837&rtfpof=true&sd=true)

Name Pete Krawitz  
 E-mail pete.krawitz@gmail.com  
 Signature 

### Comments

Krawitz Family. Number of kids: 1. Age: 5

### Petition Letter Link:

[https://docs.google.com/document/d/1LI5VuArnLqZTCwpLLiQ\\_msRGi7Z9Ancs/edit?usp=sharing&oid=101085050226411259837&rtfpof=true&sd=true](https://docs.google.com/document/d/1LI5VuArnLqZTCwpLLiQ_msRGi7Z9Ancs/edit?usp=sharing&oid=101085050226411259837&rtfpof=true&sd=true)

Name Lisa Horschman  
 E-mail lhorschman@gmail.com  
 Signature 

### Comments

Horschman Family: 3 kids (12, 8, 4) attending Vineland Elementary

**Petition Letter Link:**

[https://docs.google.com/document/d/1LI5VuArnLqZTCwpLLiQ\\_msRGi7Z9Ancs/edit?usp=sharing&oid=101085050226411259837&rtpof=true&sd=true](https://docs.google.com/document/d/1LI5VuArnLqZTCwpLLiQ_msRGi7Z9Ancs/edit?usp=sharing&oid=101085050226411259837&rtpof=true&sd=true)

**Name** Jami Mock

**E-mail** jamismarty@hotmail.com

**Signature**

**Comments**

A YMCA in Poulsbo would be supportive of a sustainable community for teens & seniors and promote wellness in our communities in the north end.

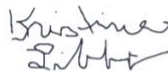
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**Name** Kristine Libby

**E-mail** kristinelibby@mac.com

**Signature**

**Comments**

Please endorse! Thank you

**Petition Letter Link:**

[https://docs.google.com/document/d/1LI5VuArnLqZTCwpLLiQ\\_msRGi7Z9Ancs/edit?usp=sharing&oid=101085050226411259837&rtpof=true&sd=true](https://docs.google.com/document/d/1LI5VuArnLqZTCwpLLiQ_msRGi7Z9Ancs/edit?usp=sharing&oid=101085050226411259837&rtpof=true&sd=true)

**Name** Monica Murphy

**E-mail** monica.cumiskey@gmail.com

**Signature**

**Petition Letter Link:**

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**Name** Laura Chester

**E-mail** llchester25@gmail.com

**Petition Letter Link:**

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**Name** Mark Libby

**E-mail** mklibby@earthlink.net

**Signature**

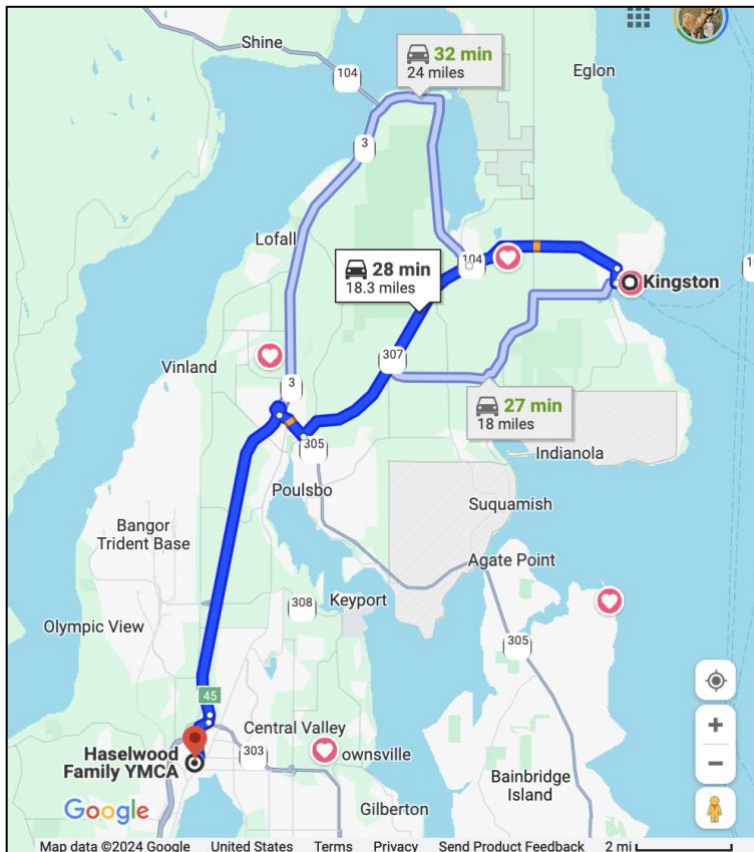
**Comments**

Athletic fields and courts are critical infrastructure for a health society. North Kitsap does not have sufficient active recreation facilities for existing population and will need even more to meet needs of the projected growth. Thanks for your consideration. Mark Libby



[Return to Comment Matrix](#)

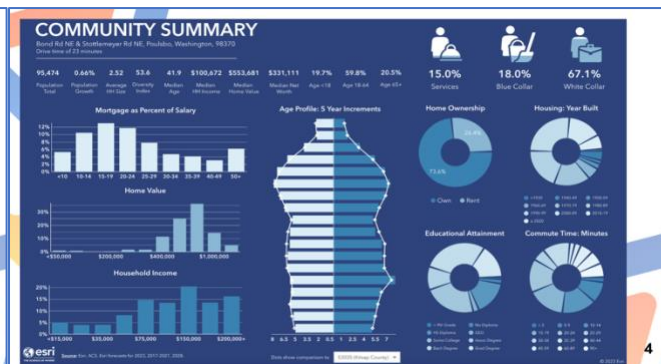
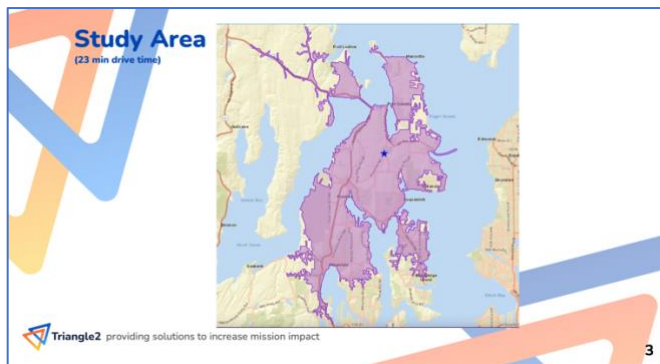
## Appendices

### **Appendix A:** Distance from Kingston, WA to Haselwood Family YMCA in Silverdale, WA (28 min / 18.3 miles)



### **Appendix B:** June 2023 YMCA's North Kitsap / Poulsbo Market Study

 <p>Prepared by: Lori Swann Triangle2 Solutions 615.946.9022</p> <p><b>North Kitsap/Poulsbo Market Study Refresh</b></p> <p>June 20, 2023</p>	<p><b>Overview</b></p> <p>The YMCA of Pierce &amp; Kitsap County commissioned a study to refresh data from an original July 2016 study in North Kitsap County. The methodology for this new study included 408 completed phone interviews and a refresh of all demographic data.</p> <p> Triangle2 providing solutions to increase mission impact</p> <p>2</p>
--	---



### Study Site Demographics

Summary	Census 2010	Census 2020	2022	2027
Population	60,616	63,228	64,745	66,361
Households	33,076	35,807	36,275	36,865
Families	23,129	-	24,943	25,407
Average Household Size	2.53	2.54	2.54	2.54
Owner Occupied Housing Units	22,913	-	26,639	27,207
Renter Occupied Housing Units	10,162	-	9,636	9,657
Median Age	39.3	-	41.9	42.9

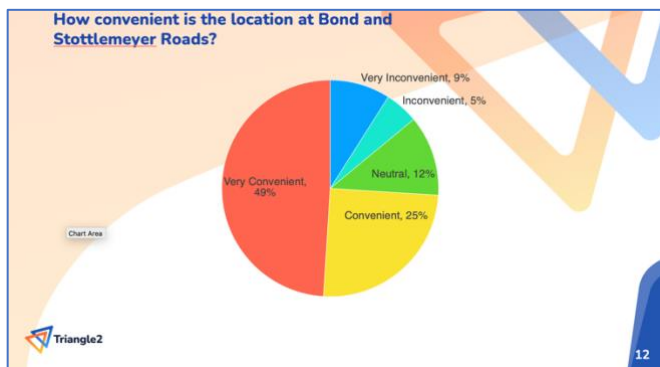
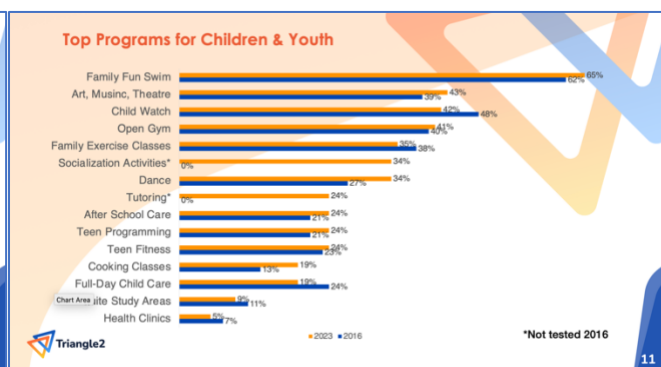
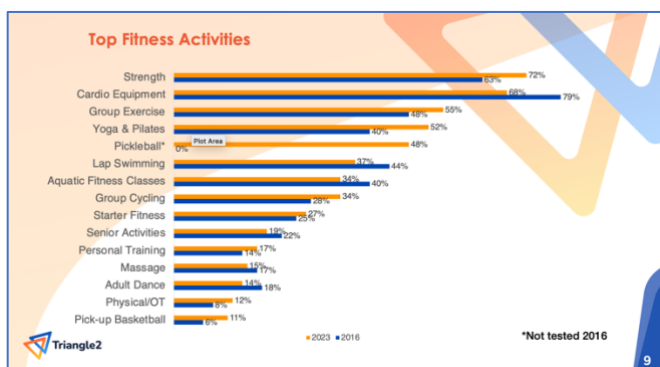
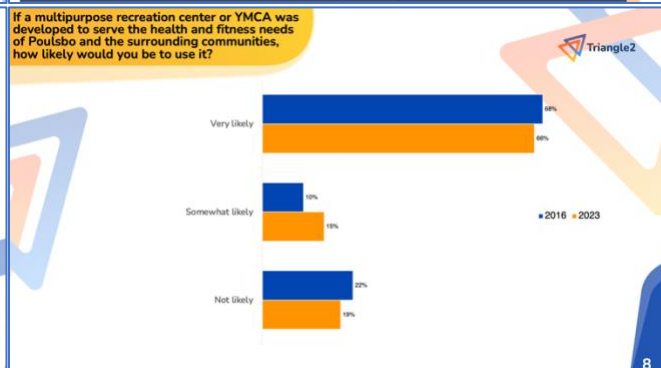
  

Trends: 2010-2027 Annual Rate	Area	State	National
Population	0.34%	0.52%	0.25%
Households	0.37%	0.50%	0.31%
Families	0.37%	0.52%	0.28%
Owner Rate	0.42%	0.52%	0.53%
Median Household Income	2.71%	3.77%	3.12%

Household Income	2022	2027
<\$15,000	1,417	902
\$15,000 - \$24,999	1,341	856
\$25,000 - \$34,999	1,306	819
\$35,000 - \$44,999	2,820	1,944
\$45,000 - \$54,999	6,462	5,759
\$55,000 - \$64,999	5,543	5,634
\$65,000 - \$74,999	8,750	8,719
\$75,000 - \$84,999	3,930	5,363
\$85,000 - \$94,999	4,623	5,887
\$95,000+	-	-
Median Household Income	\$55,137	\$58,762
Average Household Income	\$126,173	\$146,863
Per Capita Income	\$48,967	\$57,583

Triangle2 providing solutions to increase mission impact

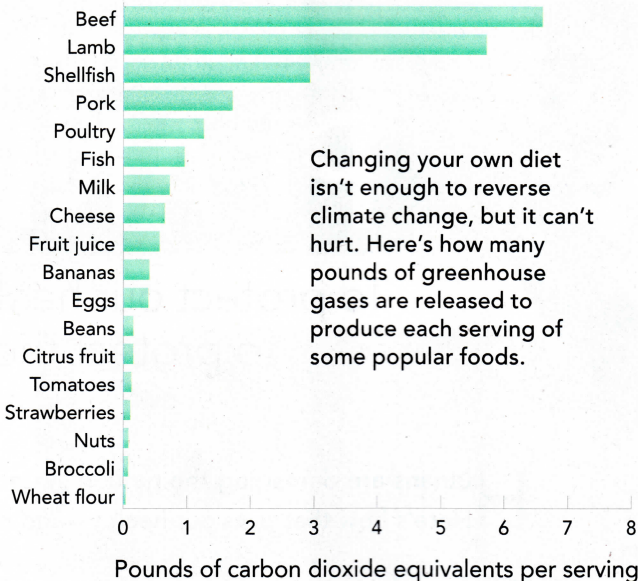


### Membership Unit Projections

	2016	2023
Total Households	31,543	36,865
Projected Family Units	1,470	1,890
Projected Adult Units	930	1,418
Projected Couple Units	160	420
Projected Young Adult Units	1,855	1,802
<b>Total</b>	<b>4,416</b>	<b>5,530</b>
Current YMCA Units that will transfer some or all usage to new facility (included above)	1,884	?

Triangle2





Source: *J. Ind. Ecol.* 19: 391, 2015.



February 15, 2024

Commissioner Rolfes, District 1  
Commissioner Garrido, District 2  
Commissioner Walters, District 3  
Eric Baker, Deputy County Administrator

The Port of Kingston is writing in support of the Raydient re-zone application for 418 acres changing the property's classification from Rural Wooded to Rural Residential. We have followed Raydient's analysis of the property's environmental parameters, indicating relatively minimal geophysical and environmental challenges.


We are aware of the property's location outside of the Kingston Urban Growth Area boundary and have thus weighed our support for the application very seriously. In sum, we are in support of Raydient's proposal to increase the allowable number of residential lots on the parcel from 20 to 80, in light of their repeated commitments to cluster the units to provide at least 200+ acres of community-owned open space as well as the transportation mitigations required by Kitsap County and appropriate utilities infrastructure.

Our support is specifically based in Raydient's emerging partnership with the YMCA and the Kingston-North Kitsap Rotary Club's regional sports and recreation complex project. We believe that such a recreation facility is sorely needed in North Kitsap and has indeed been identified for several decades as a goal for the community. With this project, it can now become a reality. This will significantly enhance the communities served and their ability to support and nourish the existing and projected residents of North Kitsap.

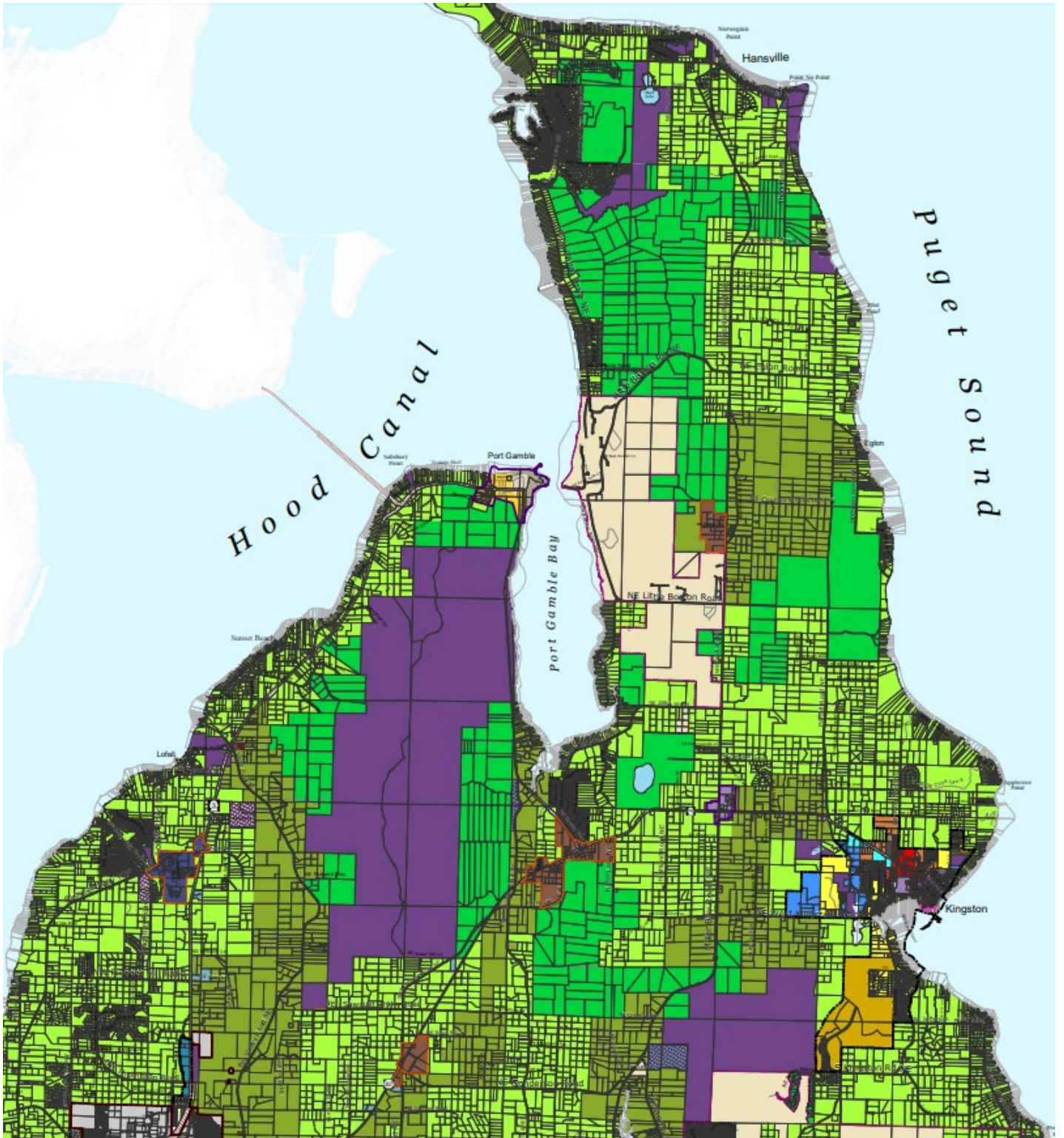
The Port of Kingston supports the land use application based on our commitment to Kingston's economic development and vitality. Kingston's business community will be in a position to provide services to users from within the County and the broader region, especially during sports tournaments. This will contribute positively to the identity of Kingston as a lively community that supports our residents' lives and families.

With these key outcomes in mind, we urge you to act favorably with regards to Raydient's application for changing its zoning classification from Rural Wooded to Rural Residential.

DocuSigned by:  
  
Laura Gronnvoll, Commissioner

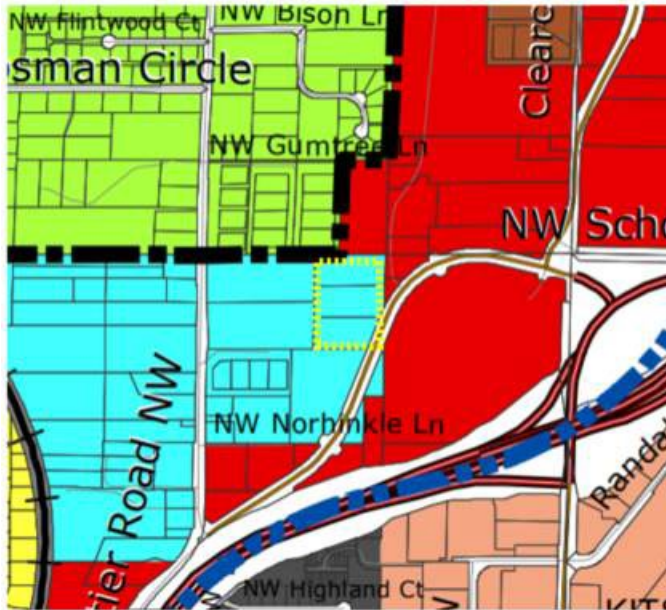
DocuSigned by:  
  
Mary McClure, Commissioner

DocuSigned by:  
  
Greg Englin, Executive Director



[Return to Comment Matrix](#)

Current Zoning:



Current Draft Comp Plan:



[Return to Comment Matrix](#)



Here are my concerns:

**Growth Management Act:** This project would create intense development in a rural area adjacent to the Port Gamble Heritage Park- disorganized sprawl that the Growth Management Act was designed to avoid. To promote responsible and sustainable growth, this type of dense project should be located in an urban setting with urban amenities. Our Rural areas are part of Kitsap's beauty and character and need to be protected. Permitting this rezone sets a bad precedent; other developers will want to follow suit and the rural area will be turned into sprawl.

**Traffic:** Traffic infrastructure already cannot handle the existing traffic. There is no sensible plan to deal with the traffic added by the sports complex, commercial zone, and additional homes outside one per 20 acres. There is no public transportation to the proposed sports complex site.

**Duplication of new sports centers:** This proposed project is 3.8 miles from the proposed Poulsbo Event and Recreation Center (PERC), and planning for that project is already underway. The city of Poulsbo opposes the rezone of the Bond Road property.

**Viability of Funding:** There is no confirmation that the sports complex can obtain funding for construction and ongoing maintenance, including wastewater discharge and road improvements. Taxpayers could end up with unsustainable tax burdens. We could end up with Raydient's wish list for housing and commercial development being built, but no way for the community to proceed on the sports complex project due to inability to fully fund the project.

**Water and Environment:** This proposed housing development, sports complex, and commercial zone would be located on a critical aquifer recharge area, near mapped fish bearing streams, and a mapped wetland- putting our local drinking water resources and watershed health at risk. A sports complex including turf fields and large amounts of parking would cause high amount of impervious surface, stormwater discharge and wastewater. For instance, the septic discharge is estimated at 100,000 gallons a day.

**Wildlife Habitat and Park environment:** The rezoning proposal would displace numerous animal populations currently living on this site. The intensity of development would degrade the habitat and outdoor experience of Port Gamble Forest Heritage Park, with neighboring lighting, car trips, and user population.

**Tribal Concerns:** Port Gamble S'Klallam Tribe opposes the Rezone on Bond Road.

The Suquamish Tribe opposes the rezoning of rural protection or urban restricted parcels to more intensive uses.

**Affordable Housing Goals:** The rezone and sports complex do not help with the target for affordable housing that the County is required to meet by the GMA. The houses will only be for high income earners.

I urge you to vote against the Raydient rezone request and the proposed sports complex to keep development within the UGA as required by the GMA, protect areas of North Kitsap's rural character, discourage suburban sprawl development, minimize additional traffic congestion, and protect our natural environment, water quality, and habitat.

Dear Kitsap County Commissioners,

I am writing to express my concerns about the Raydient request to rezone their 400 acres on Bond Road and the proposed sports complex, commercial zone, and increased density housing development. This is the wrong place for a sports complex and intense development. Here are my concerns:

**Growth Management Act:** This project would create intense development in a rural area adjacent to the Port Gamble Heritage Park- disorganized sprawl that the Growth Management Act was designed to avoid. To promote responsible and sustainable growth, this type of dense project should be located in an urban setting with urban amenities. Our Rural areas are part of Kitsap's beauty and character and need to be protected. Permitting this rezone sets a bad precedent; other developers will want to follow suit and the rural area will be turned into sprawl.

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# Environment Chapter for 2024 Comp Plan

Evaluation by Dr. David Onstad

## General points

As noted clearly in their Chapter, the County didn't have to say that it is concerned about the environment nor explain how it plans to protect nature. However, the County's chapter is generally vague and idealistic to such an extent that one wonders if any of these "promises" are real. No Net Loss is an old, failed paradigm. The County should prepare for the future by accepting Net Ecological Gain as the paradigm supported by data and Best Available Science.

Actions and practices over the past 5 years have indicated either no accomplishments described in last Comp Plan or failure to (1) measure ecosystem services and (2) protect nature. The Critical Areas Ordinance has many flaws. Those in the CAO working groups organized by the County have difficulty improving or adding the rational environmental protections needed in this fundamental set of rules. These difficulties seem to contradict the platitudes and lofty goals expressed in this chapter.

In the following, quotes identify text from COMP Plan chapter.

## The County Defines the Environment is an Economic Asset

"Since the 2016 Comprehensive Plan update, and with a keen eye on planning for the future, Kitsap County has placed a higher priority on environmental sustainability in public policy. A community that embraces sustainability must continually improve the relationship between the developed and natural environments. This includes managing the natural environment as an essential asset alongside other assets like roadways, buildings, and capital facilities. Like these other assets, the natural environment provides services and economic benefits that require planning, coordination, monitoring, and supportive fiscal policies and strategies."

**Response:** It is not surprising that an economically-focused agency and County describes the environment as an asset. I am in favor of measuring the economic value of ecosystem services, but I also know from the scientific literature and knowledge of many human communities that nature has spiritual, psychological, and emotional value for humans that will be difficult to measure. Citizens' willingness to pay for nature may help add to any initial, easy to calculate estimates of economic value for environmental assets. However, even then we will only be valuing nature from a human perspective. The Kitsap Environmental Coalition and others believe that Nature has the right to exist even if it provides no direct value (service) to society.

Does the Plan really have to describe the environment as an asset? **No.** On Page 3-32 of the Draft EIS for the Comp Plan, the County describes VISION 2050, which "contains multicounty

planning policies (presented as goals, policies, and actions)” “VISION 2050 is Puget Sound Regional Council’s shared plan for moving toward a sustainable future in the region.” The County supports VISION 2050. One goal concerning the environment is “The region cares for the natural environment by protecting and restoring natural systems, conserving habitat, improving water quality, and reducing air pollutants. The health of all residents and the economy is connected to the health of the environment. Planning at all levels considers the impacts of land use, development, and transportation on the ecosystem.” Note this does not depend on an analysis of ecosystem services from an economic or other perspective.

### Asset Management

“In 2018, Kitsap County began working with the Washington Environmental Council, Port Gamble S’Klallam Tribe, and Suquamish Tribe to develop the natural asset management program. This new management program defines baseline levels of service or functional conditions of forest cover, streams, and shorelines and aims to develop goals or desired level of service for each asset. The desired levels of service will help guide investments and prioritization of actions to restore and protect natural systems. In addition, County staff continue to explore further implementation of the program into County planning.”

“Asset management refers to treating the components of the public infrastructure system as assets within the public trust to be stewarded by the local government.”

“Kitsap Natural Resource Asset Management Program (KNRAMP) is a new framework to manage natural assets (such as forests, streams, and shorelines) using the same asset management and capital improvements principles that municipalities use to manage built infrastructure.”

**Response:** This model or software has not been completed. It may never be completed. It is good that the County is collaborating with the other groups.

### Best Available Science

“Environment Policy 2.1. Use the best available science in developing policies and development regulations to protect the functions and values of critical areas.”

“Best Available Science Under the state Growth Management Act (GMA), local governments are required to use the best available science in their policies and regulations on critical areas. Best available science means current scientific information used in the process to designate, protect, or restore critical areas, that is derived from a valid scientific process as defined by the Washington Administrative Code.”

**Response:** Dr. David Onstad, an ecologist, reviewed the “BAS” included in a report by consultants on the update of the CAO and found it significantly lacking in current science pertaining to wildlife and wetlands. There were few citations of non-governmental reports (journal articles) published since 2010. For the wildlife references (Section 7.3) he noted that only 7 of the journal articles were published since 2010. About half of those pertain to car chemicals in the environment. As a research scientist with knowledge of the exponentially increasing amount of literature in almost all areas of applied and basic science, Onstad decided that the consultant’s literature review did not find all the relevant science (and all best available science) that exists since 2010. To demonstrate this weakness, he did a citation search for journal articles which cited and likely improved, supported or expanded upon the few referred to in the County’s BAS report. The search found many other papers that seemed highly relevant based on a reading of the abstracts. Onstad concluded that either state law and WDFW allow BAS to be less than academic up-to-date BAS or that the County is ignoring much of the BAS.

### Net Ecological Gain

The County seems content to follow the No Net Loss paradigm. According to the County, “No Net Loss is a standard that ensures new developments do not introduce new impacts that decrease ecological functions. If impacts do occur, projects must mitigate those impacts to demonstrate no net loss.”

**Response:** The following text explains why we need Net Ecological Gain as a paradigm in the County. Some would say that No Net Loss (NNL) is not based on the Best Available Science. In addition, long-term monitoring of mitigation sites is lacking.

The consultants for WA Department of Fish and Wildlife (Davis and Gunnell 2022) stated “Washington currently has a No Net Loss (NNL) policy for development involving shorelines, wetlands, and certain other critical habitats. Despite significant investments in the recovery of salmon and other fish and wildlife species, **scientific evidence of continued ecosystem decline in Washington indicates that NNL policies are not working or are not going far enough to protect our state’s rich natural heritage.**” “In advancing Net Ecological Gain standards, the state must simultaneously address these issues and others tied to NNL.”

The WDFW report expands upon these concerns in the following statements “The decline in ecosystem function and biodiversity in the state indicates that **NNL is not being achieved**, experts said. However, this failure is tied to a lack of proper implementation of the standards and other key gaps in the policy, including:

(a)The baseline for which impacts are measured against is undefined or inconsistent, and there are not clear metrics for monitoring success or failure through time.

(b) There is not enough scientific understanding around site specific ecosystem function degradation and whether offsite (and especially out-of-kind) mitigation is equal to or outperforms the site-specific degradation.

(c) Overall, there is insufficient monitoring of NNL standards.

(d) There has been a persistent lack of accountability and enforcement, which exacerbates noncompliance.

Thus, we conclude that variances in the County are permitted too often with required mitigation procedures that rarely produce equal or better ecological function. In essence, destroying one tree in a riparian zone cannot simply be mitigated by planting a tree anywhere. Replacing an entire stream that nature has developed over a thousand years cannot be replaced with a few-months effort.

Our final concern about mitigation is another one highlighted in the WDFW report “Mitigation required by local and state agencies does not have a long-term requirement beyond the initial monitoring period, meaning that when properties are sold, the new owners can degrade the mitigation.” Neither structure nor function can be measured over short term and declared sufficient.

Davis J, and Gunnell C, Cascadia Consulting Group, The Watershed Company, ECONorthwest. 2022. Net Ecological Gain Standard Proviso Summary Report. Olympia, WA: Washington Department of Fish and Wildlife.

### Critical Areas

“Environment Goal 2. Critical Areas Designate and protect critical areas. Critical areas include wetlands, critical aquifer recharge areas, fish and wildlife habitat conservation areas, frequently flooded areas, and geologically hazardous areas.”

**Response:** The primary effort should be to change the CAO and change the culture within DCD. The Comp Plan is too vague and idealistic to determine the real, practical protections for nature that the County needs. Unfortunately, the 12 policies listed in the 2017 CAO are not adequately followed or implemented in Kitsap County. Ten and one half of the twelve policies declare that the County will support and protect the environments of the County. Only one-half of policy #4 mentions that allowable use of land will protect property rights and development. Do the 10 and ½ policies really protect critical areas in Kitsap County? Or does the ½ (of #4) trump the rest? The Comp Plan and the new CAO should at least be honest and transparent about how the County truly deals with the environment and critical areas. Have only two policies: one stating something about property rights and development and another that describes protecting critical areas.

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Given the scale of local physical and chemical destruction of amphibians and their habitats, and their critical role in ecosystem dynamics, I'd like to offer nine ideas for discussion on how we might preserve amphibian-friendly (i.e., fishless) wetlands (what we call **vernal ponds** and **intermittent streams**). What I see is an ongoing, creeping acceptance of eventual extinction of species as the price to pay for middle class comfort. We should not endorse this inevitability gracefully. To that end:

01. Property tax relief for owners of private fishless wetlands, including those who create such wetlands with suitable buffers.
02. Require actual enforcement of building restrictions in temporary wetlands, emphasizing the inviolability of setbacks and buffers. No escape clauses or provisional avoidances.
03. Require professional wetland delineation of all property transfers, paid for by the buyer.
04. Define the minimal size of wetlands qualifying as 'amphibian breeding habitat' so as to avoid the argument over 'mud puddles'.
05. Add amphibian friendly, reproductive habitat to the Critical Areas Ordinance (CAO) regulations. Wetland preservation should not all be about salmon – there is no trickle-down benefit to amphibians in the current protection of salmon streams.
06. Serious legal penalties for intentionally filling wetlands and abusing buffers. For example, loss of tax relief on affected property if wetlands are negatively impacted.
07. Wetland buffer size (setbacks) should reflect the actual terrestrial needs of metamorphosed amphibians (tens to hundreds of acres), larger than one might think given their diminutive size.
08. Redesign and reconstruction of stormwater ponds to reflect the needs of reproductive amphibians attracted to these sites. Referred to in the pertinent literature as 'ecological traps', most of these ponds, designed for infiltration, not retention, last too short a time to allow full development of larval amphibians.
09. The Planning Commission (or DCD) must include a bonified zoologist, preferably two (vertebrate and invertebrate). Retired biologists are everywhere, often looking for productive ways to contribute, perhaps in an advisory role to the County Commissioners...

Thank you for your attention.

Respectfully.

Thomas Doty, Ph.D., Biological Sciences. Emeritus Professor of Biology, Roger Williams University.

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March 4, 2024

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

Dear Planning Commissioners:

**Subject: Comments on the Draft Kitsap County Comprehensive Plan 2024**

Sent via email: [compplan@kitsap.gov](mailto:compplan@kitsap.gov); [awalston@kitsap.gov](mailto:awalston@kitsap.gov)

Thank you for the opportunity to comment on the Draft Kitsap County Comprehensive Plan 2024. Futurewise strongly supports the update. We support Alternative 2 - compact growth without the proposed urban growth area expansions. Alternative 2 represents the best option for addressing the challenges and opportunities Kitsap County faces. We have additional comments on the Draft Comprehensive Plan below. We first summarize them and then provide more detailed recommendations in the following section.

Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. We have members across Washington State including Kitsap County.

## Summary of our Comments

- Futurewise supports Alternative 2 - compact growth without the proposed urban growth area expansions. This alternative is more likely to reduce greenhouse gas pollution, allow more affordable and middle-income housing, and to be affordable to taxpayers and ratepayers.
- The comprehensive plan must reduce greenhouse gas pollution consistent with VISION 2050. This will reduce adverse impacts on water supplies, fish and wildlife habitat, flooding, and the environment. Please see page 3 of this letter for more information.
- Incorporate additional upzones within the existing urban growth areas to eliminate the need for UGA expansions. This will provide for more affordable housing and save taxpayers and ratepayers money. Please see page 6 of this letter for more information.

- The comprehensive plan should have stable urban growth areas consistent with VISION 2050. This will save taxpayers and ratepayers money and protect the environment. Please see page 7 of this letter for more information.
- The comprehensive plan needs to reduce rural growth rates over time to achieve the Regional Growth Strategy rural population growth target of eight percent of the county's total population growth. This will save taxpayers and ratepayers money, reduce adverse effects on the environment, and reduce the adverse impacts of natural hazards. Please see page 5 of this letter for more information.
- The comprehensive plan should not include rural comprehensive plan amendments or upzones that increase rural population and employment capacity. Again, this will save taxpayers and ratepayers money, reduce adverse effects on the environment, and reduce the adverse impacts of natural hazards. Please see page 9 of this letter for more information.
- Futurewise supports Land Use Goal 7, Historic, archaeological, and cultural resources, and recommends the addition of a Land Use Strategy requiring pre-ground disturbance site investigations for sites where the state predictive model show cultural resources are likely or when requested by affected Native American Tribes and Nations. This will protect cultural sites from damage and reduce the potential for costly shutdowns for developments. Please see page 10 of this letter for more information.
- Futurewise supports the Environment Element in the Comprehensive Plan. It will help protect the environment that benefits the community and fish and wildlife.
- The Environment Goals, Policies and Strategies should limit impervious surfaces and forest clearing outside urban growth areas to protect salmon habitat. This will help with salmon and steelhead recovery. Please see page 12 of this letter for more information.
- Futurewise strongly supports including the Climate Change Element in the Comprehensive Plan. The climate element will help the County reduce the severity of climate change and address the adverse impacts.
- Please adopt policies and regulations to direct growth away from the Wildland-Urban Interface (WUI) and to encourage and require implementation of the Firewise Principles. This will protect people and property from wildfire and reduce burdens on firefighters. Please see page 13 of this letter for more information.
- Designate agricultural lands of long-term commercial significance in the Comprehensive Plan. This will help protect an important economic sector and

provide for locally grown food. Please see page 14 of this letter for more information.

- The Growth Management Act requires water quantity policies and regulations as part of the 2024 comprehensive plan and development regulations update. These provisions will help protect senior water rights holders and protect salmon and steelhead and aid in their recovery. Please see page 15 of this letter for more information.
- Do not require parking for residential and mixed-use developments near transit stops with good existing or planned transit service. This will help reduce housing costs and promote infill development. Please see page 17 of this letter for more information.
- Please include information in the housing element or a background report identifying sufficient capacity of land for permanent supportive housing and affordable housing. This will help ensure that affordable housing can be successfully constructed. Please see page 19 of this letter for more information.

## Detailed Comments

### The comprehensive plan must reduce greenhouse gas pollution consistent with VISION 2050.

We appreciate that the 2024 Comprehensive Plan Update Draft Environmental Impact Statement for Kitsap County (DEIS) projected greenhouse gas emissions for the three alternatives. Unfortunately, the DEIS concludes that “[r]elative to 2019 greenhouse gas (GHG) emissions will increase under all three alternatives.”<sup>1</sup>

Unfortunately, increasing greenhouse gas emissions is inconsistent with VISION 2050. Comprehensive plans must be consistent multicounty planning policies.<sup>2</sup> VISION 2050 includes the following goal:

GOAL: The region substantially reduces emissions of greenhouse gases that contribute to climate change in accordance with the goals of the Puget Sound Clean Air Agency (50% below 1990 levels by 2030)

<sup>1</sup> 2024 Comprehensive Plan Update Draft Environmental Impact Statement Kitsap County p. 1-8 (Dec. 2023).

<sup>2</sup> *West Seattle Defense Fund v. City of Seattle*, CPSGMHB Case No. 94-3-0016, Final Decision and Order (April 4, 1995), at \*55; *Friends of Pierce County, et al., City of Bonney Lake, and Marilyn Sanders, et al. v. Pierce County, and Orton Farms et al., City of Sumner, Bethell School District, Puyallup School District, and Forterra NW*, CPSRGMHB Case No. 12-3-0002c, Final Decision and Order (July 9, 2012), at 11 of 138.

and 80% below 1990 levels by 2050) and prepares for climate change impacts.<sup>3</sup>

Multicounty Planning Policy (MPP)-CC-11 provides “[s]upport achievement of regional greenhouse gas emissions reduction goals through countywide planning policies and local comprehensive plans.”<sup>4</sup> CC-Action-3, Policies and Actions to Address Climate Change, provides that:

Cities and counties will incorporate emissions reduction policies and actions that contribute meaningfully toward regional greenhouse gas emission goals, along with equitable climate resiliency measures, in their comprehensive planning. Strategies include land uses that reduce vehicle miles traveled and promote transit, biking, and walking consistent with the Regional Growth Strategy, developing and implementing climate friendly building codes, investments in multimodal transportation choices, and steps to encourage a transition to cleaner transportation and energy systems.<sup>5</sup>

As you can see, the goal, multicounty planning policy, and action require the Kitsap County comprehensive plan to incorporate emissions reduction policies and actions that contribute meaningfully toward regional greenhouse gas emission goals. These goals are substantial. A comprehensive plan whose alternatives will increase greenhouse gas pollution is inconsistent with VISION 2050. The County must comply with the requirement that the comprehensive plan policies and actions must reduce greenhouse gas emissions. This the current draft does not do.<sup>6</sup>

To comply with VISION 2050, we recommend the following additional mitigation be included:

- Not approving comprehensive plan and zoning amendments that will increase greenhouse gas emissions. Amendments that increase greenhouse gas emissions include urban growth area expansions and rural capacity increases.<sup>7</sup>

<sup>3</sup> Puget Sound Regional Council, *VISION 2050: A Plan for the Central Puget Sound Region* p. 56 (Oct. 2020) last accessed on Feb 20, 2024, at: <https://www.psrc.org/planning-2050/vision-2050> and at the link on the last page of this letter with the filename: “vision-2050-plan.pdf.

<sup>4</sup> *Id.* p. 61.

<sup>5</sup> *Id.*

<sup>6</sup> 2024 Comprehensive Plan Update Draft Environmental Impact Statement Kitsap County p. 1-8 (Dec. 2023).

<sup>7</sup> For the correlation between urban form and greenhouse pollution see Daniel Hoornweg, Lorraine Sugar, and Claudia Lorena Trejos Gomez, *Cities and Greenhouse Gas Emissions: Moving Forward* 5

- A peer-reviewed scientific paper has documented that to meet the necessary reductions in greenhouse gas pollution higher residential densities are needed.<sup>8</sup> Nationally, densities must increase on average by 19 percent.<sup>9</sup> The paper concluded this can be achieved by a “mix of small apartment buildings and modest single-family homes ....”<sup>10</sup> Incorporate these housing types and densities into the County’s urban growth areas (UGAs). This will also help make housing more affordable.
- Amend the zoning regulations to allow corner stores, cafes, day care, and other basic services in residential neighborhoods as a transportation mitigation strategy. Bringing these destinations closer to homes will shorten trips and increase the ability of residents to complete these trips by walking and bicycling. This will reduce greenhouse gas emissions and provide healthy, active transportation options.
- Invest in multimodal transportation facilities, which is already a feature of the comprehensive plan, and do not invest in transportation facilities that will increase greenhouse gas emissions.
- The Southern Resident Orca Task Force’s *Final Report and Recommendations* recommends promoting “‘live where you work’ to reduce commutes while improving public transportation infrastructure.”<sup>11</sup> This is an effective mitigating measure to reduce traffic and greenhouse gas emissions along with impacts on water quality and fish and wildlife habitats.

URBANISATION 43, pp. 50 – 52 (2020) last accessed on Feb. 28, 2024, at: <https://journals.sagepub.com/doi/pdf/10.1177/2455747120923557> and at the link on the last page of this letter with the filename: “hoornweg-et-al-2020-cities-and-greenhouse-gas-emissions-moving-forward.pdf.” Urbanisation is a peer reviewed journal. See the Urbanisation webpage last accessed on Feb. 28, 2024, at: <https://journals.sagepub.com/home/urb> and at the link on the last page of this letter with the filename: “Urbanisation webpage.pdf.”

<sup>8</sup> Benjamin Goldstein, Dimitrios Gounaridis, and Joshua P. Newell, *The carbon footprint of household energy use in the United States* 117 PROCEEDINGS OF THE NATIONAL ACADEMY OF SCIENCES OF THE UNITED STATES OF AMERICA (PNAS) 19122, p. 19122 (Aug. 11, 2020) last accessed on Feb. 20, 2024, at: <https://www.pnas.org/content/117/32/19122> and at the link on the last page of this letter with the filename: “goldstein-et-al-2020-the-carbon-footprint-of-household-energy-use-in-the-united-states.pdf.” PNAS is a peer-reviewed journal. PNAS Author Center last accessed on Oct. 19, 2023, at: <https://www.pnas.org/author-center> and at the link on the last page of this letter with the filename: “PNAS Author Center.pdf.”

<sup>9</sup> Benjamin Goldstein, Dimitrios Gounaridis, and Joshua P. Newell, *The carbon footprint of household energy use in the United States* 117 PROCEEDINGS OF THE NATIONAL ACADEMY OF SCIENCES OF THE UNITED STATES OF AMERICA (PNAS) 19122, p. 19128 (Aug. 11, 2020).

<sup>10</sup> *Id.*

<sup>11</sup> Southern Resident Orca Task Force, *Final Report and Recommendations* p. 107 (Nov. 2019) last accessed on Feb. 20, 2024, at: <https://www.orca.wa.gov/wp-content/uploads/TaskForceFinalReport-2019.pdf> and at the link on the last page of this letter of this letter with the filename: “TaskForceFinalReport-2019.pdf.”



- The U.S. Environmental Protection Agency (EPA) found that state and local governments can significantly reduce greenhouse gas emissions through land and materials management practices such as materials efficiency, industrial ecology, green design, land revitalization, sustainable consumption, smart growth, pollution prevention, and design for environment.<sup>12</sup> These should also be included as additional mitigation measures.
- We recommend adding as mitigating measures the strategies and actions identified as most effective to reduce vehicle use by the recent meta-analysis by Kuss and Nicholas.<sup>13</sup>

### **Incorporate additional upzones within the existing urban growth areas to eliminate the need for UGA expansions.**

The Southern Resident Orca Task Force’s *Final Report and Recommendations* calls for Washington to “increase affordable housing and reduce urban sprawl by growing ‘up instead of out.’”<sup>14</sup> We recommend that the comprehensive plan not expand urban growth areas and instead grow up.

The Kitsap County Buildable Lands Report identified a gap between the need for 9,700 housing units at medium high and high housing densities to provide housing affordable to individuals and families with incomes of less than 80 percent of the adjusted median income and the existing capacity of less than 4,500 units or, if housing is built to its maximum capacity, up to about 6,000 housing units.<sup>15</sup> To

<sup>12</sup> US Environmental Protection Agency, Office of Solid Waste and Emergency Response, *Opportunities to Reduce Greenhouse Gas Emissions through Materials and Land Management Practices* pp. 19 – 28 (Sept. 2009) last accessed on Feb. 20, 2024, at:

<https://www.epa.gov/sites/production/files/documents/ghg-land-materials-management.pdf> and at the link on the last page of this letter with the filename: “ghg-land-materials-management.pdf.”

<sup>13</sup> Paula Kuss and Kimberly A Nicholas, *A dozen effective interventions to reduce car use in European cities: Lessons learned from a meta-analysis and transition management* 10 CASE STUDIES ON TRANSPORT POLICY pp. 1494-1513 (Issue 3, Sept. 2022) last accessed on Feb. 19, 2024, at

<https://www.sciencedirect.com/science/article/pii/S2213624X22000281> and at the link on the last page of this letter with the filename: “1-s2.0-S2213624X22000281-main.pdf.” Case Studies On Transport Policy is a peer reviewed journal. Case Studies On Transport Policy Guide for Authors pp. \*13 – 14 last accessed on Feb. 20, 2024, at: <https://www.sciencedirect.com/journal/case-studies-on-transport-policy/publish/guide-for-authors>

<https://www.sciencedirect.com/science/article/pii/S2213624X22000281> and at the link on the last page of this letter with the filename: “CASE STUDIES ON TRANSPORT POLICY Guide for Authors.pdf.”

<sup>14</sup> Southern Resident Orca Task Force, *Final Report and Recommendations* p. 107 (Nov. 2019).

<sup>15</sup> *Buildable Lands Report Kitsap County, Washington Draft* (Aug. 2021) Appendix E: Draft Housing Availability and Affordability Memo p. 8 last accessed on February 16, 2024, at: [https://www.kitsap.gov/dcd/PEP%20Documents/FINAL%20Buildable%20Lands%20Report\\_Nove](https://www.kitsap.gov/dcd/PEP%20Documents/FINAL%20Buildable%20Lands%20Report_Nove)

adequately serve those individuals and families the land zoned for medium high and high density housing units will have to be significantly above 9,700 housing units since housing at those densities is attractive to higher income individuals and families. These upzones should be in existing cities and urban growth areas.

**The comprehensive plan should have stable urban growth areas consistent with VISION 2050. See the Future Land Use Map.**

Comprehensive Plan Alternatives 2 and 3 propose urban growth area expansions.<sup>16</sup> “VISION 2050 calls for a stable and sustainable urban growth area into the future, thus any adjustments to the urban growth area [UGA] in the coming decades should continue to be minor. When adjustments to the urban growth area are considered, it will be important to avoid encroaching on important habitat and natural resource areas.”<sup>17</sup> MPP-RGS-5 provides “[e]nsure long-term stability and sustainability of the urban growth area consistent with the regional vision.”<sup>18</sup> MPP-RGS-6 also provides: “Encourage efficient use of urban land by optimizing the development potential of existing urban lands and increasing density in the urban growth area in locations consistent with the Regional Growth Strategy.”<sup>19</sup> Comprehensive plans must be consistent multicounty planning policies.<sup>20</sup> Consistent with VISION 2050, we recommend that the adopted comprehensive plan not include urban growth area expansions.

The GMA requires urban growth areas and limits their size for many reasons. One of the most important is that compact urban growth areas (UGAs) save taxpayers and ratepayers money. In a study published in a peer reviewed journal, Carruthers and Ulfarsson analyzed urban areas throughout the United States including Kitsap County.<sup>21</sup> They found that the per capita costs of most

[mber%202021.pdf](#) and at the link on the last page of this letter with the filename: “FINAL Buildable Lands Report\_November 2021.pdf.”

<sup>16</sup> 2024 Comprehensive Plan Update Draft Environmental Impact Statement Kitsap County pp. 2-12 – 2-13, p. 2-24 (Dec. 2023).

<sup>17</sup> Puget Sound Regional Council, *VISION 2050: A Plan for the Central Puget Sound Region* p. 43 (Oct. 2020).

<sup>18</sup> *Id.*

<sup>19</sup> *Id.*

<sup>20</sup> *West Seattle Defense Fund v. City of Seattle*, CPSGMHB Case No. 94-3-0016, Final Decision and Order (April 4, 1995), at \*55; *Friends of Pierce County, et al., City of Bonney Lake, and Marilyn Sanders, et al. v. Pierce County, and Orton Farms et al., City of Sumner, Bethell School District, Puyallup School District, and Forterra NW*, CPSGMHB Case No. 12-3-0002c, Final Decision and Order (July 9, 2012), at 11 of 138.

<sup>21</sup> John Carruthers and Gudmaundur Ulfarsson, *Urban Sprawl and the Cost of Public Services* 30 ENVIRONMENT AND PLANNING B: PLANNING AND DESIGN 503, 511 (2003) last accessed on Feb. 20, 2024,

public services declined with density and increased where urban areas were large.<sup>22</sup> Compact urban growth areas save taxpayers and ratepayers money. Compact urban growth areas will also help achieve the GMA requirements to plan for public facilities and transportation facilities because compact urban growth areas require less costly public facilities.<sup>23</sup>

**The comprehensive plan needs to reduce rural growth rates over time and to achieve the Regional Growth Strategy adopted rural population growth target of eight percent of the county's total population growth consist with Multicounty Planning Policy MPP-RGS-14 and the Regional Growth Strategy. See the Future Land Use Map, Table 1.7 Kitsap County's Rural Land Use Designations on p. 48, LAMIRDs on pp. 49 – 51, and Rural Land Use Goals, Policies, and Strategies pp. 51 – 52.**

The Growth Management Act requires counties to comply with the Puget Sound Regional Council Multicounty Planning Policies.<sup>24</sup> Multicounty Planning Policy MPP-RGS-14 directs Kitsap County, and all of the Central Puget Sound counties, to “[m]anage and reduce rural growth rates over time, consistent with the Regional Growth Strategy, to maintain rural landscapes and lifestyles and protect resource lands and the environment.”<sup>25</sup> The Regional Growth Strategy adopted rural population growth target of eight percent of the county's total population growth or 8,000 people for Kitsap County.<sup>26</sup> On a percentage basis, this is the highest rural growth population growth target of the four Central Puget County counties.<sup>27</sup> Kitsap County's Buildable Lands Report documents that in 2013 through 2019, 29 percent of the county's population growth occurred in the rural area.<sup>28</sup> While this was an improvement over the past years, it shows that Kitsap County faces

at: [https://www.ezview.wa.gov/Portals/\\_1995/Documents/Documents/Exhibit%20%23J1%20-%20Futurewise\\_UrbanSprawl.pdf](https://www.ezview.wa.gov/Portals/_1995/Documents/Documents/Exhibit%20%23J1%20-%20Futurewise_UrbanSprawl.pdf) and at the link on the last page of this letter with the filename: “Urban sprawl and the cost of public services.pdf.” Environment and Planning B is a peer reviewed journal. See the Environment and Planning B webpage last accessed on Feb. 20, 2024, <https://journals.sagepub.com/home/epb> and at the link on the last page of this letter with the filename: “Environ & Planning B webpage.pdf.”

<sup>22</sup> John Carruthers and Gudmaundur Ulfarsson, *Urban Sprawl and the Cost of Public Services* 30 ENVIRONMENT AND PLANNING B: PLANNING AND DESIGN 503, 518 (2003).

<sup>23</sup> RCW 36.70A.020(10), (12); RCW 36.70A.060(2); RCW 36.70A.070(3), (6).

<sup>24</sup> *Stickney v. Cent. Puget Sound Growth Mgmt. Hearings Bd.*, 11 Wn. App. 2d 228, 244 – 45, 453 P.3d 25, 34 (2019).

<sup>25</sup> Puget Sound Regional Council, *Vision 2050: A Plan for the Central Puget Sound Region* p. 43 (Oct. 2020).

<sup>26</sup> *Id.* at p. 30.

<sup>27</sup> *Id.*

<sup>28</sup> *Buildable Lands Report Kitsap County, Washington Final* p. 18 (Nov. 2021).

significant challenges in crafting a comprehensive plan and development regulations that comply with the Regional Growth Strategy.<sup>29</sup>

None of the Rural Land Use Designations and Rural Land Use Goals, Policies, and Strategies call for reducing rural growth rates over time as MPP-RGS-14 requires.<sup>30</sup> The Future Land Use Map, the Rural Land Use Designations, the rural land use goals, policies, and strategies, and rural zones and development regulations need to reduce rural growth rates over time as MPP-RGS-14 requires. And proposed Land Use Strategy 16.e which in Alternative 3 calls on the County to “[r]emove lot aggregation requirements in all Type 1 LAMIRDS to diversify housing types” will likely increase rural growth violating MPP-RGS-14.<sup>31</sup> The comprehensive plan must be improved to comply with MPP-RGS-14 and the Regional Growth Strategy.

The Regional Growth Strategy limits rural growth to retain important cultural, economic, and rural lifestyle opportunities; to protect the environment including reducing greenhouse gas pollution; and to reduce the costs of transportation facilities.<sup>32</sup> So there are important policies behind the numbers.

**The comprehensive plan should not include rural comprehensive plan amendments or upzones that increase rural population and employment capacity. See the Future Land Use Map.**

As discussed above, the Growth Management Act requires counties to comply with the Puget Sound Regional Council Multicounty Planning Policies.<sup>33</sup> Multicounty Planning Policy MPP-RGS-14 directs Kitsap County, and all of the Central Puget Sound counties, to “[m]anage and reduce rural growth rates over time, consistent with the Regional Growth Strategy, to maintain rural landscapes and lifestyles and protect resource lands and the environment.”<sup>34</sup> The Regional Growth Strategy adopted rural population growth target of eight percent of the county’s total population growth or 8,000 people for Kitsap County.<sup>35</sup> On a percentage basis, this is the highest rural growth population growth target of the four Central Puget County counties.<sup>36</sup> Kitsap County’s Buildable Lands Report documents that in 2013

<sup>29</sup> *Id.* p. 19.

<sup>30</sup> Draft Kitsap County Comprehensive Plan 2024 pp. 51 – 52.

<sup>31</sup> Draft Kitsap County Comprehensive Plan 2024 p. 52.

<sup>32</sup> Puget Sound Regional Council, *Vision 2050: A Plan for the Central Puget Sound Region* p. 23 – 24, p. 37, p. 43 (Oct. 2020).

<sup>33</sup> *Stickney v. Cent. Puget Sound Growth Mgmt. Hearings Bd.*, 11 Wn. App. 2d 228, 244 – 45, 453 P.3d 25, 34 (2019).

<sup>34</sup> Puget Sound Regional Council, *Vision 2050: A Plan for the Central Puget Sound Region* p. 43 (Oct. 2020).

<sup>35</sup> *Id.* at p. 30.

<sup>36</sup> *Id.*

through 2019, 29 percent of the county's population growth occurred in the rural area.<sup>37</sup> While this was an improvement over the past years, it shows that Kitsap County faces significant challenges in crafting a comprehensive plan and development regulations that comply with the Regional Growth Strategy.<sup>38</sup>

The County's own data makes clear that the one thing Kitsap County should not do is increase rural development capacity. Alternative 3 increases the acreage of the Rural Residential (1 DU/5 Ac) zone and decreases the acreage in the Rural Protection (1 DU/10 Ac) and Rural Wooded (1 DU/20 Ac) zones.<sup>39</sup> This is an example of amendments that violate MPP-RGS-14 because they will increase rural capacity.

The Olympic Property Group/Raydient proposal to rezone land from one dwelling unit per 20-acre zoning to one dwelling unit per five acres is the opposite of what the Regional Growth Strategy requires because it will increase rural population capacity and rural growth rates. This rezone is inconsistent with VISION 2050. Other comprehensive plan amendments and zoning amendments that increase rural population capacity also appear to be inconsistent with VISION 2050.

The Regional Growth Strategy limits rural growth to retain important cultural, economic, and rural lifestyle opportunities; to protect the environment including reducing greenhouse gas pollution; and to reduce the costs of transportation facilities.<sup>40</sup> So there are important policies behind the numbers.

**Futurewise supports Land Use Goal 7, Historic, archaeological, and cultural resources, and recommends the addition of a Land Use Strategy requiring pre-ground disturbance site investigations for sites where the state predictive model show cultural resources are likely or when requested by affected Native American Tribes and Nations. Please see page 34.**

Futurewise supports Land Use Goal 7, Historic, archaeological, and cultural resources, and its associated Land Use Strategies. The Washington State Department of Archaeology and Historic Preservation has developed an archaeological predictive model that can predict where archaeological resources are likely to be located and where the department recommends archaeological surveys should be completed before earth disturbing activities and other uses and

<sup>37</sup> *Buildable Lands Report Kitsap County, Washington Final* p. 18 (Nov. 2021).

<sup>38</sup> *Id.* p. 19.

<sup>39</sup> 2024 Comprehensive Plan Update Draft Environmental Impact Statement Kitsap County pp. 2-22 – 2-26 (Dec. 2023).

<sup>40</sup> Puget Sound Regional Council, *Vision 2050: A Plan for the Central Puget Sound Region* p. 23 – 24, p. 37, p. 43 (Oct. 2020).



activities that can damage archaeological sites are undertaken.<sup>41</sup> Large areas of Kitsap County are rated as “4 - Survey Highly Advised: High Risk (Color: Pale Yellow)” and “5 - Survey Highly Advised: Very High Risk (Color: Brightest Yellow/Canary Yellow).” The map also shows other areas where surveys are also advised. This documents the clear need to protect archaeological and cultural resources in Kitsap County.

If earth disturbing activities are undertaken before a survey is conducted, significant costs can be added to the project and significant damage to archeological resources can occur. For example, the Jefferson County Public Utility District’s (PUD) contractor building a community septic system at Becket Point in Jefferson County encountered human bones and Native American artifacts.<sup>42</sup> The contractor had to stop construction. An archaeologist was called in and conducted an investigation that allowed the project to be redesigned and to be completed. However, PUD staff “estimated the delays and additional engineering incurred because of the artifacts added about \$90,000 to the project’s cost.”<sup>43</sup> At least some of that money could have been saved by an upfront archeological investigation.

To address these important issues, we recommend that the comprehensive plan include a Land Use Strategy requiring pre-ground disturbance site investigations for sites where the predictive model show cultural resources are likely or when requested by affected Native American Tribes and Nations. This land use strategy will help address the Growth Management Act historic preservation goal.<sup>44</sup>

### **Futurewise supports the Environment Element in the Comprehensive Plan.**

As the comprehensive plan states, Kitsap County residents and businesses benefit from a functioning environment. A functioning environment is also important to recover salmon. Kitsap County should be proud of its many positive actions to protect and restore the environment and summarized on pages 69 and 70 of the draft comprehensive plan. We strongly support the Environment Element.

<sup>41</sup> Washington State Department of Archaeology and Historic Preservation WISAARD webpage last accessed on Feb. 19, 2024, at: <https://dahp.wa.gov/historic-preservation/find-a-historic-place>. The results of the predictive model are available for Whatcom County to use in planning and project reviews from the Washington State Department of Archaeology and Historic Preservation.

<sup>42</sup> Jeff Chew, *Jefferson PUD sticks with Beckett Point* Connections p. 8 (Washington Public Utility Districts Association [WPUDA]: Winter 2008) last accessed on Feb. 19, 2024, at: <https://www.yumpu.com/en/document/view/46547248/connections-washington-public-utility-district-association/11>.

<sup>43</sup> *Id.* at p. 9.

<sup>44</sup> RCW 36.70A.030(13) Historic preservation. Identify and encourage the preservation of lands, sites, and structures, that have historical or archaeological significance.

**The Environment Goals, Policies and Strategies should limit impervious surfaces and forest clearing outside urban growth areas to protect salmon habitat. See the Environment Goals, Policies and Strategies on pp. 72-77 and the rural comprehensive plan designations.**

Researchers at the University of Washington have carefully studied the effects of development on stream basins in the Puget Sound Region. These studies have shown that when total impervious surfaces exceed five to ten percent and forest cover declines below 65 percent of the basin, then salmon habitat in streams and rivers is damaged.<sup>45</sup> Impervious surfaces are continuing to increase in Kitsap County.<sup>46</sup> We recommend policies and regulations that will keep total impervious surfaces below five to ten percent and forest cover at or above 50 percent of the basin to protect salmon habitat.<sup>47</sup>

**Futurewise strongly supports including the Climate Change Element in the Comprehensive Plan.**

Climate change is already causing adverse impacts on Kitsap County.<sup>48</sup> These adverse impacts are only going to worsen.<sup>49</sup> Kitsap County is wise to include a Climate Change Element in the Comprehensive Plan and Futurewise supports the element.

<sup>45</sup> Christopher W. May, Richard R. Horner, James R. Karr, Brian W. Mar, Eugene B. Welch, *The Cumulative Effects of Urbanization on Small Streams in the Puget Sound Lowland Ecoregion* p. 17 of 26 (University of Washington, Seattle Washington) last accessed on Feb. 20, 2024, at: [https://www.researchgate.net/publication/240437080\\_Effects\\_of\\_Urbanization\\_on\\_Small\\_Streams\\_in\\_the\\_Puget\\_Sound\\_Lowland\\_Ecoregion](https://www.researchgate.net/publication/240437080_Effects_of_Urbanization_on_Small_Streams_in_the_Puget_Sound_Lowland_Ecoregion) and enclosed at the link on the last page of this letter with the filename: "Effects\_of\_Urbanization\_on\_Small\_Streams\_in\_the\_Pu.pdf."

<sup>46</sup> *2020 State of Our Watersheds State of Our Watersheds: A Report by the Treaty Tribes in Western Washington* p. 316, p. 318 last accessed on Feb. 20, 2024, at: <https://nwifc.org/publications/state-of-our-watersheds/> and at the link on the last page of this letter with the filename: "state-of-our-watersheds-sow-2020-final-web.pdf."

<sup>47</sup> Christopher W. May, Richard R. Horner, James R. Karr, Brian W. Mar, Eugene B. Welch, *The Cumulative Effects of Urbanization on Small Streams in the Puget Sound Lowland Ecoregion* pp. 20 – 21 of 26 (University of Washington, Seattle Washington).

<sup>48</sup> Kitsap County, Bremerton, and Port Orchard, *Kitsap County Climate Change Resiliency Assessment* p. 8 (June 2020 | Final Report) last accessed on Feb. 28, 2024, at: [https://www.kitsap.gov/dcd/Pages/Climate\\_Change\\_Resiliency\\_KC.aspx](https://www.kitsap.gov/dcd/Pages/Climate_Change_Resiliency_KC.aspx).

<sup>49</sup> *Id.* p. 10.

**Please adopt policies and regulations to direct growth away from the Wildland-Urban Interface (WUI) and to encourage and require Firewise Principles.**

Large areas of Kitsap County are located in the Wildland-Urban Interface (WUI).<sup>50</sup> Wildfire is a significant threat in Kitsap County and climate change is making the threat worse.<sup>51</sup> The Growth Management Act in RCW 36.70A.070(1) provides in part that:

The land use element must reduce and mitigate the risk to lives and property posed by wildfires by using land use planning tools, which may include, but are not limited to, adoption of portions or all of the wildland urban interface code developed by the international code council or developing building and maintenance standards consistent with the firewise USA program or similar program designed to reduce wildfire risk, reducing wildfire risks to residential development in high risk areas and the wildland urban interface area, separating human development from wildfire prone landscapes, and protecting existing residential development and infrastructure through community wildfire preparedness and fire adaptation measures.

While we appreciate and support the several wildfire policies, RCW 36.70A.070(1) requires more. We recommend that development be directed away from the WUI.

<sup>50</sup> Ashley Blazina and Kirk Davis, *The Wildland-Urban Interface: Mapping Washington State's fastest-growing environment* (Sept. 2, 2020) last accessed on Feb. 17, 2024, at: <https://storymaps.arcgis.com/stories/7016c437623a445997c072a05e26afbb>. See also the map University of Washington Climate Impacts Group's (UW CIG) Climate Mapping for a Resilient Washington (CMRW) webtool Change in High Fire Danger Days last accessed on Feb. 20, 2024, at: <https://cig-wa-climate.nkn.uidaho.edu/> and at the link on the last page of this letter with the filename: "Kitsap Cnty Change in High Fire Danger Days.png." The State of Washington Department of "Commerce considers the CMRW webtool a source of best available science and scientifically credible projections, so this guidance makes using the webtool a required starting point for all jurisdictions that are creating or updating a climate resilience sub-element. Commerce encourages jurisdictions to use additional resources ..., as needed, to explore climate hazards and impacts on local assets and sectors. State of Washington Department of Commerce Climate Element Planning Guidance p. 17 (Dec. 2023 – Intermediate Version) last accessed on Feb. 20, 2024, at: <https://deptofcommerce.app.box.com/s/fpg3holbwn2ctqig7jg80zh54ie19jx> and at the link on the last page of this letter with the filename: "IntermediatePlanningGuidance\_FINAL.pdf."

<sup>51</sup> H.A. Morgan, A. Bagley, L. McGill, and C.L., Raymond, *Managing Western Washington Wildfire Risk in a Changing Climate Workshop Summary* pp. 4 – 7 (Workshop summary report prepared by the Northwest Climate Adaptation Science Center and the Climate Impacts Group, University of Washington, Seattle: Dec. 3, 2018) last accessed on Feb. 20, 2024, at: <https://cig.uw.edu/publications/managing-western-washington-wildfire-risk-in-a-changing-climate/> and at the link on the last page of this letter with the filename: "Managing-Western-Washington-Wildfire-Risk-in-a-Changing-Climate.pdf."

We also recommend the adoption and enforcement of the Firewise Principles which recommend “‘two ways out’ of the neighborhood for safe evacuation during a wildfire along with other important measures to protect people and property[.]”<sup>52</sup> We recommend that the following new policy be adopted as part of the Land Use Element or the Climate Change Element:

Land Use Policy XX. Direct non-resource land uses and development away from the Wildland-Urban Interface (WUI), encourage the implementation of Firewise Principles for existing developments and uses, and require implementation of Firewise Principles for new developments and uses.

Most areas within the Wildland-Urban Interface (WUI) should have natural resource or low-density rural land use designations in the comprehensive plan. These areas should also be zoned for natural resource uses or low-density rural uses.

### **Designate agricultural lands of long-term commercial significance in the Comprehensive Plan.**

In 2023, the State of Washington Department of Commerce updated its minimum guidelines for designating agricultural lands of long-term commercial significance. These changes included expanding the soil types that indicate an area has long-term commercial significance to include farmlands of statewide importance soils in addition to prime and unique farmland soils.<sup>53</sup> Commerce made additional changes in 2023 as well.<sup>54</sup>

The 2022 Census of Agriculture documents that the acres of land in farms in Kitsap County increased from 9,391 acres in 2017 to 9,539 acres in 2022.<sup>55</sup> Total income from farm-related sources in Kitsap County increased from \$3,161,000 in

<sup>52</sup> *A Guide To Firewise Principles* p. \*4 accessed on Feb. 21, 2024, at: <https://www.nfpa.org/education-and-research/wildfire/firewise-usa/firewise-toolkit> and enclosed at the link on the last page of this letter with the filename: “FirewiseToolkitFirewisePrinciples.pdf.”

<sup>53</sup> WAC 365-190-050(3)(c)(i) (2023).

<sup>54</sup> WAC 365-190-050 (2023).

<sup>55</sup> United States Department of Agriculture National Agricultural Statistics Service, *2022 Census of Agriculture Washington State and County Data Volume 1 • Geographic Area Series • Part 47 AC-22-A-47 Chapter 2. County Data Table 8. Farms, Land in Farms, Value of Land and Buildings, and Land Use: 2022 and 2017* p. 286 (Issued Feb. 2024) last accessed on Feb 20, 2024, at: [https://www.nass.usda.gov/Publications/AgCensus/2022/Full\\_Report/Volume\\_1\\_Chapter\\_2\\_County\\_Level/Washington/](https://www.nass.usda.gov/Publications/AgCensus/2022/Full_Report/Volume_1_Chapter_2_County_Level/Washington/) and at the link on the last page of this letter with the filename: “wav1.pdf.”

2017 to \$4,791,000 in 2022.<sup>56</sup> Average per farm income increased from \$23,944 in 2017 to \$53,831 in 2022.<sup>57</sup>

One of the purposes of periodic updates is to comply with the requirements of the Growth Management Act including the designation of natural resource lands and the application of the minimum guidelines in WAC 365-190-050.<sup>58</sup> Given the changes in the minimum guidelines and the economic benefit of local agriculture, Kitsap County should designate agricultural lands of long-term commercial significance in the comprehensive plan consistent with the updated minimum guidelines.

**The Growth Management Act requires water quantity policies and regulations as part of the 2024 comprehensive plan and development regulations update.**

RCW 36.70A.070(1) provides that “[t]he land use element shall provide for protection of the quality and quantity of groundwater used for public water supplies.” RCW 36.70A.070(5)(c)(iv) provides that “[t]he rural element shall include measures that apply to rural development and protect the rural character of the area, as established by the county, by: ... Protecting surface water and groundwater resources.” The GMA in RCW 36.70A.590 also provides that:

For the purposes of complying with the requirements of this chapter [the GMA] relating to surface and groundwater resources, a county or city may rely on or refer to applicable minimum instream flow rules adopted by the department of ecology under chapters 90.22 and 90.54 RCW. Development regulations must ensure that proposed water uses are consistent with RCW 90.44.050 and with applicable rules adopted pursuant to chapters 90.22 and 90.54 RCW when making decisions under RCW 19.27.097 and 58.17.110.

These policies development regulations are required because overuse of surface or ground water often harms senior water rights holders and fish and wildlife habitat. “Eighty percent (80%) of the Kitsap County population uses groundwater

<sup>56</sup> United States Department of Agriculture National Agricultural Statistics Service, *2022 Census of Agriculture Washington State and County Data Volume 1 • Geographic Area Series • Part 47 AC-22-A-47 Chapter 2. County Data Table 6. Income From Farm-Related Sources: 2022 and 2017* p. 274 (Issued Feb. 2024).

<sup>57</sup> *Id.*

<sup>58</sup> RCW 36.70A.130(1)(a); *Concerned Friends of Ferry Cnty. v. Ferry Cnty.*, 191 Wn. App. 803, 834, 365 P.3d 207, 222 (2015).



that is pumped from wells.”<sup>59</sup> “As the population grows, so does the demand for groundwater. The quantity of usable groundwater is limited.”<sup>60</sup> As water use increases, water levels decline, groundwater discharges to streams decrease, and seawater intrudes into groundwater.<sup>61</sup> “Coho salmon, steelhead and cutthroat trout are the most vulnerable to low stream flows (and warm waters) because they rear in freshwater in the summer when low flow/high temperature conditions can constrain habitat and stress fish in some streams.”<sup>62</sup>

The reduced availability of surface water can have a negative impact on all stages of the salmonid life cycle. Water quality (e.g. temperature, flows) is affected by decreased inputs from groundwater. Lessened groundwater input concentrates pollutants, increases temperature, and diminish[es] dissolved oxygen. This is detrimental to salmonid migration, spawning and rearing.<sup>63</sup>

The *East Kitsap Demographically Independent Population (DIP) Steelhead Recovery Plan* “identifies various strategies to address water withdrawals and low streamflows for steelhead and their habitat” including “[e]nforce and improve land-use regulations that protect hydrology, including aquifer recharge areas ....”<sup>64</sup>

To help carryout the *East Kitsap Demographically Independent Population (DIP) Steelhead Recovery Plan* and to comply RCW 36.70A.590, the comprehensive plan and development regulations should adopt policies and regulations to ensure development complies with the water codes, the applicable instream flow rules, and the watershed plan updated under RCW 90.94.020.

RCW 36.70A.590 requires the development regulations to ensure that proposed water uses are consistent with RCW 90.44.050. When the County determines if a development, land division, or use qualifies for a residential permit exempt well under RCW 90.44.050, the development regulations must require that the County limit the water used by the proposal and the parent parcel that existed in 2002, any lots created from the parent parcel, and any development built on or after 2002 on those lots to the no more than the 5,000 gallons a day allowed by RCW

<sup>59</sup> *2020 State of Our Watersheds State of Our Watersheds: A Report by the Treaty Tribes in Western Washington* p. 321 last accessed on Feb. 20, 2024, at: <https://nwifc.org/publications/state-of-our-watersheds/> and at the link on the last page of this letter with the filename: “state-of-our-watersheds-sow-2020-final-web.pdf.”

<sup>60</sup> *Id.*

<sup>61</sup> *Id.*

<sup>62</sup> *Id.*

<sup>63</sup> *Id.* p. 40.

<sup>64</sup> *Id.* pp. 321 – 22.

90.44.050. Under the State Supreme Court’s *Campbell and Gwinn* decision, each lot is entitled to one 5,000 gallon per day permit exempt withdrawal for single or group domestic uses under RCW 90.44.050.<sup>65</sup> A “developer may not claim multiple exemptions for the homeowners.”<sup>66</sup> So each lot that existed in 2002, the year the *Campbell and Gwinn* decision was decided, is entitled to one permit-exempt withdrawal under RCW 90.44.050.

As lots are subdivided or developed over time, part or all of the permit exempt withdrawals are used by the lots created or the development authorized. To qualify for a permit-exempt groundwater withdrawal authorized under RCW 90.44.050, the lot must have some remaining water from the parent parcel’s single 5,000 gallon per day permit exempt withdrawal for single or group domestic uses.

Therefore, the required regulations can only authorize the use of a permit exempt-well for single or group domestic uses if the water use allowed under the permit-exemption does not exceed the 5,000 gallons a day allowed by RCW 90.44.050 including the parent parcel that existed in 2002, any lots created from the parent parcel, and any development built on or after 2002. To comply with RCW 36.70A.590, the proposed development regulations must include this important limitation.

### **Do not require parking for residential and mixed-use developments near transit stops with good existing or planned transit service.**

We appreciate that the comprehensive plan recognizes that properly managing parking can encourage the use of transit and non-motorized transportation options and encourage affordable housing.<sup>67</sup> Futurewise recommends eliminating parking minimums for multifamily, mixed-use housing, and affordable housing with good transit service. Multi-family and mixed-use developments in these areas can help reduce single-occupancy vehicle traffic and increase transit use by being planned and developed as transit-oriented developments.<sup>68</sup>

Households living in transit-oriented developments are twice as likely to not own a car, and own roughly half as many cars as comparable households not living in

<sup>65</sup> *State Dep’t of Ecology v. Campbell & Gwinn, L.L.C.*, 146 Wn.2d 1, 14, 43 P.3d 4, 110 (2002).

<sup>66</sup> *Id.*

<sup>67</sup> Draft Kitsap County Comprehensive Plan 2024 p. 173, p. 176, p. 199, p. 207, p. 215, p. 216, p. 218.

<sup>68</sup> Futurewise | GGLO | Transportation Choices Coalition, *Transit-oriented communities: A Blueprint for Washington State* pp. 27 – 29 (Oct. 2009) last accessed on Feb. 27, 2024, at: <http://www.reconnectingamerica.org/assets/Uploads/tccblueprintfortoc2009.pdf> and at the link on the last page of this letter with the filename: “tccblueprintfortoc2009.pdf.”

transit-oriented developments.<sup>69</sup> Eliminating parking minimums does not eliminate parking, instead allows developers to provide the parking the market demands.<sup>70</sup>

Reducing or eliminating parking also makes housing more affordable.<sup>71</sup> A study using American Housing Survey data found that “[m]inimum parking requirements in municipal zoning codes drive up the price of housing ....”<sup>72</sup> The study authors wrote:

We find that the cost of garage parking to renter households is approximately \$1,700 per year, or an additional 17% of a housing unit’s rent. In addition to the magnitude of this transport cost burden being effectively hidden in housing prices, the lack of rental housing without bundled parking imposes a steep cost on carless renters—commonly the lowest income households—who may be paying for parking that they do not need or want. We estimate the direct deadweight loss for carless renters to be \$440 million annually. We conclude by suggesting cities reduce or eliminate minimum parking requirements, and allow and encourage landlords to unbundle parking costs from housing costs.<sup>73</sup>

Parking reforms work. A peer reviewed study of Seattle’s parking reforms showed “that (1) minimum parking requirements constrain developers, though not uniformly; and (2) reducing requirements leads to less parking provision, and presumably cost savings for developers and lower housing prices for consumers. These findings highlight the impact that policymakers can have by reducing or

<sup>69</sup> National Academies of Sciences, Engineering, and Medicine, *Effects of TOD on Housing, Parking, and Travel* p. 6 (Washington, DC: The National Academies Press: 2008) last accessed on Feb. 27, 2024, at <https://doi.org/10.17226/14179> and on the last page of this letter with the filename: “14179.pdf.”

<sup>70</sup> *Id.*

<sup>71</sup> *Id.*

<sup>72</sup> C. J. Gabbe & Gregory Pierce, *Hidden Costs and Deadweight Losses: Bundled Parking and Residential Rents in the Metropolitan United States* 27 HOUSING POLICY DEBATE 217, 217 (2017) (page 2 in the enclosed version) last accessed on Feb. 27, 2024, at: <https://scholarcommons.scu.edu/cgi/viewcontent.cgi?article=1040&context=ess> and on the last page of this letter with the filename: “Hidden costs and deadweight losses\_ Bundled parking andresidentia.pdf.” Housing Policy Debate is peer reviewed. Housing Policy Debate Aims and scope webpage last accessed on Feb. 27, 2024, at: <https://www.tandfonline.com/action/journalInformation?show=aimsScope&journalCode=rhpd20>.

<sup>73</sup> *Id.*

eliminating off-street parking requirements.”<sup>74</sup> “Seattle developers built 40% less parking than would have been required prior to the reforms, resulting in 18,000 fewer parking spaces and saving an estimated \$537 million.”<sup>75</sup>

The Regional Plan Association looked at trends in the construction of affordable housing in New York City after the city waived parking requirements in certain areas. Since the requirements were waived, the annual number of affordable units built has “shot up.”<sup>76</sup> “[W]aiving parking requirements for new buildings has yielded more new affordable homes, especially on smaller parcels of land.”<sup>77</sup>

In addition to saving money, “parking reform can lower tax rates, revive business districts, decrease property vacancies, and allow development of fewer off-street parking spaces as property becomes available for other uses (Hess, 2017).”<sup>78</sup> For all of these reasons, we recommend that residential development, mixed-use, and affordable housing with good existing or planned transit service not be required to provide parking for motor vehicles.

**Please include information in the housing element or a background report identifying sufficient capacity of land for permanent supportive housing and affordable housing.**

RCW 36.70A.070(2)(c) requires the Kitsap County housing element, and the housing elements of the cities, to identify “sufficient capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, [and] permanent supportive housing ....” Using the State of

<sup>74</sup> C.J. Gabbe, Gregory Pierce, Gordon Clowers, *Parking policy: The effects of residential minimum parking requirements in Seattle* 91 LAND USE POLICY 104053, 104053 (Feb. 2020) last accessed on Feb. 27, 2024, at: <https://www.sciencedirect.com/science/article/abs/pii/S0264837718312870>. Land Use Policy is peer reviewed. *Id.*

<sup>75</sup> *Id.*

<sup>76</sup> Regional Plan Association, *Parking Policy Is Housing Policy: How Reducing Parking Requirements Stimulates Affordable Housing Production* p. \*1 (Dec. 2022) last accessed on Feb. 27, 2024, at: <https://rpa.org/work/reports/parking-policy-is-housing-policy#zqa-unlocked-potential-for-more-as-of-right-smaller-affordable-developments>.

<sup>77</sup> *Id.* at p. 2.

<sup>78</sup> Daniel Baldwin Hess Jeffrey Rehler, *Minus Minimums: Development Response to the Removal of Minimum Parking Requirements in Buffalo (NY)* 87 JOURNAL OF THE AMERICAN PLANNING ASSOCIATION 396, 397 (2021) last accessed on Feb. 27, 2024, at: <https://www.tandfonline.com/doi/pdf/10.1080/01944363.2020.1864225?needAccess=true&> and at the link on the last page of this letter with the filename: “Minus Minimums.pdf.” The Journal of the American Planning Association is peer reviewed.

Washington Department of Commerce Housing for All Planning Tool (HAPT) methodology, the population targets are converted to needed housing units by income category and beds for permanent supportive housing. The County must then identify the land with the zoning capacities needed to accommodate these housing units by income band or category.

The State of Washington Department of Commerce has documented that low- and mid-rise wood frame housing types are needed to provide housing affordable to families and individuals with incomes between 0 to 80 percent of the adjusted median income when subsidies are available.<sup>79</sup> These housing types also provide housing affordable to families and individuals earning between 80 to 120 percent of the adjusted median income without subsidies.<sup>80</sup> With subsidies, high-rise buildings are also affordable to families and individuals earning between 80 to 120 percent of the of the adjusted median income.<sup>81</sup> Accessory dwelling units on existing lots can also provide housing for families and individuals earning 80 to 120 percent of the adjusted medium income in higher cost communities.<sup>82</sup>

In identifying “sufficient capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, [and] permanent supportive housing ...,” the County must take into account its comprehensive plan and development regulations. The analysis must also take into account that low- and mid-rise wood frame housing types are needed to provide both subsidized affordable housing and to meet the market demand for these housing types and their rents.<sup>83</sup> Note that RCW 36.70A.070(2)(c) requires “sufficient capacity of land” for both affordable and market rate housing including market rate multifamily housing. If the inventory and analysis shows that sufficient capacity is not available, the comprehensive plan and development regulations will have to be amended as RCW 36.70A.040(3)(d) requires “development regulations that are consistent with and implement the comprehensive plan....” Development regulations must also comply with the GMA

<sup>79</sup> Washington States Department of Commerce, Local Government Division Growth Management Services, *Guidance for Updating Your Housing Element: Updating your housing element to address new requirements* p. 33 (Aug. 2023) last accessed on Jan. 17, 2024, at: <https://deptofcommerce.app.box.com/s/1d9d517g509r389fomjpowh8isjpirlh> and at the link on the last page of this letter with the filename: “HB 1220\_Book2\_Housing Element Update\_230823 Final\_updated 231031.pdf.”

<sup>80</sup> *Id.*

<sup>81</sup> *Id.*

<sup>82</sup> *Id.*

<sup>83</sup> *Id.*



including RCW 36.70A.070(2)(c).<sup>84</sup> It may be that the county has already completed this work, if so please let us know.

Thank you for considering our comments. If you require additional information, please contact me at telephone (206) 343-0681 or email: [tim@futurewise.org](mailto:tim@futurewise.org).

Very Truly Yours,

A handwritten signature in blue ink, consisting of a stylized 'T' and 'S' intertwined.

Tim Trohimovich  
Director of Planning and Law

Enclosures at this link:

[https://futurewiseorg.sharepoint.com/:f:/g/Esm6h\\_SA4lRNmI9V73SKKsEB5-1sFxocA2MbUg2fhAqLUw?e=OQYXPO](https://futurewiseorg.sharepoint.com/:f:/g/Esm6h_SA4lRNmI9V73SKKsEB5-1sFxocA2MbUg2fhAqLUw?e=OQYXPO)

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<sup>84</sup> *Kittitas Cty. v. Eastern Washington Growth Management Hearings Bd.*, 172 Wn.2d 144, 164, 256 P.3d 1193, 1203 (2011) citing RCW 36.70A.130(1) accord RCW 36.70A.290(2).

Katie,

In light of the upcoming discussion of the Comprehensive Plan and recent attention to the North Sound to Olympics Trail, I would like to highlight one very important idea about safe, non-motorized transportation.

The Comprehensive Plan calls attention to non-motorized transportation, such as in Goal 1 on page 105: *Provide a well-maintained, safe, integrated, and sustainable multi-modal transportation system that supports the County's population, land use plan, and provides connections within and between communities.*

And this is described in more detail in goals for various communities, such as Suquamish Policy 10.1. *Examine, and if feasible implement, speed controls and widening/paved shoulders on NE Columbia Street to increase safety as the alternate northern route out of Suquamish.*

**I would like to suggest a slightly different approach: that non-motorized traffic should be given every bit as much right to safe routes as motorized traffic has.**

There are numerous laws regulating the design of roads to make them safe for motorized traffic. **The laws should be revised to require that all roads are either designed (or retrofitted) to be just as safe for non-motorized traffic as for motorized traffic, or that alternate routes are provided for safe walking, biking, and rolling.** Furthermore, key routes connecting communities with essential services such as grocery stores, banks, pharmacies, jobs, etc. need to be brought up to those standards immediately.

How can this be done?

It is clear from the Comprehensive Plan that the cost of improvements for non-motorized safety in the many communities where they are necessary far outweighs the transportation budget for the foreseeable future. To provide safe walking, biking, and rolling on the routes necessary for community members to access essential services, additional money must be provided.

It is also clear that funding and planning are divided up among different departments and government entities, such as transportation, parks, city, county, and state. However, those are complications to be worked around, not excuses to avoid solving the problem.

**I suggest that in light of this immediate need, essential non-motorized travel be prioritized over recreational expenditures.** I would like you to transfer funds from recreational transportation (such as the NSTO) to a budget for retrofitting essential routes currently unsafe for walking, biking, and rolling — such as a route from Suquamish to nearby shopping in Kingston.

As far as the North Kitsap situation goes, this needn't put a large burden on recreational desires. Non-motorized traffic already has a much safer route on the paved shoulders of Hiway 104 from Kingston to Port Gamble than non-motorized traffic has from Suquamish or Seabeck to grocery stores, banks, jobs, or pharmacies. Therefore, delaying the NSTO won't create a hardship for recreation travelers that is anywhere near the hardship that a large number of potential non-motorized shoppers or workers have been facing for a long time.

While the paved shoulders on Hiway 104 may not be optimal,



they are far, far better than the lack of paved shoulders on most of Miller Bay Road below.



Thank-you for your attention to this,

John Williams

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Planning Board and BOCC,

Thank you for your efforts throughout this entire process. I was fortunate to sit on a 2024 Comp Plan Sub Committee of the Central Kitsap Community Council and learn from Eric, Jim, and Colin about some of what goes into planning a comprehensive plan. I hope that you three (and the many others who have contributed) are able to have a vacation when this is all wrapped up!

I am aware that the preferred alternative will lean heavily on Alternative 2, increasing density in our urban areas, and encouraging redevelopment of these areas. It is my hope, however, that county planners and the BOCC will also allow some of the low impact rural to rural zonings to be included as part of their preferred alternative.

My parents have a reclassification request regarding property they own on NE Anna Rd in Poulsbo (Dave and Carolyn Wixson) that I would like to voice my support on. This is a rural-to-rural zoning requesting reclassification from Rural Protection (1Du/10Ac) to Rural Residential (1Du/5Ac). We have one next-door neighbor as well as another neighbor north of us on Central Valley Rd who have also made similar requests. These requests if approved, will have minimal impact on our environment given they are only one house per 5 acres, and their “central” locations, would make them excellent candidates to fit into the 15% growth targets for rural growth over the next 20 years.

Central Valley Rd is very convenient to different parts of Kitsap County. While these parcels are not inside the Poulsbo, CK, or Silverdale urban growth area, they are just 10 minutes from Silverdale, Poulsbo, and East Bremerton. They are very convenient to many of the largest employers and shopping centers of our entire County. Since “Appropriately sited and designed housing located near jobs, schools, and services can help reduce the negative impacts of traffic and commuting.” is a goal of the 2024 Comprehensive plan, it is my hope that this location factor can be acknowledged and accounted for, regarding some of these rural-to-rural reclassifications.

I do want to remind county planners and officials that our rural areas are a huge appeal to many people who move here. Many current owners of SFRs in these rural areas can attest to the fact that if they had to buy their houses today, they simply wouldn’t be able to afford them. That to me is a very concerning issue, but I am not sure how this issue is solved by not increasing our supply of **both** urban and rural housing.

We all recognize that historical trends in Kitsap County have created a housing stock that is mostly SFRs with many of them existing in rural parts of the county. We also recognize that they

are the most expensive part of our housing inventory. However, by refusing to allocate additional new rural land for this type of housing, it is my opinion that we will continue to price out many more income levels from living in the rural areas of Kitsap. These rural areas will eventually only exist for the wealthy and the elite.

I am genuinely afraid that I will be one of the last generations raised in Kitsap County where at median income levels, parents were able to afford a single-family residence on acreage and provide the lifestyle that goes along with that, to their children. Many of my friends my age can also relate to having a yard to play in as children, a garden, or even farm animals.

Many of the families on the Alt 3 list are like us, in that they are just local people who have owned parcels for several years or even decades. It is my hope that all zoning types, and all applicants can be recognized as important, and be accounted for when making impactful planning decisions in the coming months.

I sincerely appreciate your time and consideration in this process.

- Ryan Wixson

Central Kitsap Community Council Member & Third generation Kitsap County Resident

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“Save Enetai”  
2811 Rozewood Drive  
Bremerton WA 98310  
*Saveenetai.org*

February 20, 2024

Commissioners of the Kitsap County Comprehensive Plan update (2024)  
614 Division Street, MS-36  
Port Orchard, WA 98366

Dear Sirs and Madams:

We are asking that the county change the zoning of the Cheney-Fisher plat, located to the south of the Illahee Community Plan and 30th street. Our suggestion to the Kitsap County Comprehensive plan update is to lower the zoning of this plat (associated with permit number 23-05658) to something more consistent with major ecological concerns existing there. We think returning that plat to the zoning prior to 2016 is appropriate; it certainly should be much lower than the proposed nine units per acre the developer is now planning. We believe that the county was in error when they changed the zoning in 2016. Possibly the seller of the property misrepresented the area; it is fairly well established that this is an eagle habitat as well as containing probably two salmon streams. From LIDAR it is an unstable slope, as such falls under the critical areas classification, and is protected both federally and at the state level by many ordinances.

We understand this is a small concern in comparison to Kitsap's other concerns, but Enetai is dropping through the cracks between Bremerton and Kitsap County planning. It is not enough to expect the developer and owner of this property to generate an environmental impact study (EIS); *that is like putting the fox in charge of the henhouse*. Let's not be naive. There are other solutions the owner can find for his land which would be less impactful. The area *should* be an extension of the Illahee Plan, already adopted by the county.

Ms. Schultz is professionally qualified/certified to teach Biology and Science in the State of Washington, and she holds a Master of Science degree. She is also a tribal member of the Muskogee-Creeks, and takes the heritage of her people and their relationship to the land very seriously. Our concerns are that of citizen-scientists, of educators, and as a matter of cultural heritage. She lives on Viewcrest, to the north of the Fisher Plat.

**The first of multiple concerns is biological.** The wildlife in the Enetai-Illahee greenbelt biome is often observed by resident citizens; some are listed under the Priority Habitat and Species Act (PHS) and include eagles (species of concern under PHS), raccoons, opossums, deer, bobcats (possible Canadian Lynx which are endangered), river otters, bats, doves, pileated woodpeckers, two species of squirrel (Douglas and grey) at least four species of owls (Great Grey, Barred, Barn-Tyto and Screech) all have been observed, sited, tracked, photographed and heard for over 25 years in this region. Innumerable migratory songbirds are also here along

with small hawks, and the purple martin (listed "of concern" under PHS) and marble murrelet. Off-shore waters sometimes host orca and seals, and the shoreline is mapped as surf smelt spawning habitat, and sand lance spawning area as per Fish and Wildlife. ALL raptors (hunting birds) have protection under the Migratory Bird Act (MBA.) Enetai is a dynamic, well-populated, active biome, home to MANY species of animal.

Our primary concern is the Fisher Plat as an eagle habitat. The eagles were personally heard by Ms. Schultz in Oct 2023, right where the nest is mapped on the Fisher Plat, then again (same area) Feb 3, 2024, and a nest was sighted. Eagle nests are huge, built to be sturdy (they don't just disappear with a click of the mouse as "old information") and the two documented by Fish and Wildlife (see attached email from Alexia Henderson) in the proposed Fisher development are likely still occupied, home to eaglets in breeding season. Both nests probably belong to the same pair of eagles (they like a choice) and residents in the area see AND HEAR eagles on a regular basis. It seems a foregone conclusion that the eagles are still there. The site is perfect for eagles, and there is no reason they would have decamped. Eagles not only are long-lived, but their nests can pass down to future generations, for when one mate dies, the survivor goes out and finds another mate; that might go on for years. Eagle nests have been documented to last for decades, occupied up to 34 years.

Eagles are covered under PHS (Priority Habitat and Species) and that reference may be found at <https://wdfw.wa.gov/species-habitats/at-risk/phs>. The GMA and Shoreline Management act requires that this process, developing an "Eagle Plan" is part of the planning process for any development in Washington State where eagles are present. Eagles AND THEIR NESTS are also covered by a wide range of State AND Federal protections, all of which may be read at the following link:

[https://en.wikipedia.org/wiki/Bald\\_and\\_Golden\\_Eagle\\_Protection\\_Act](https://en.wikipedia.org/wiki/Bald_and_Golden_Eagle_Protection_Act)

<https://www.fws.gov/species/bald-eagle-haliaeetus-leucocephalus/map>

<https://wdfw.wa.gov/species-habitats/at-risk/species-recovery/bald-eagle>

Not far to the west of the Fisher Plat, there is a new installation next to Mountain View Middle School, a sports field with huge white flood-lights (not the amber lights of Viewcrest and neighborhoods in our greenbelt), and neighbors are already complaining about disturbed sleep patterns. If anyone bothered to do an EIS on this construction, they utterly failed. As per writings by noted biologist, UW professor John Marzluff in *Subirdia*, light pollution is one of the most destructive effects Mankind has in our modern world, it throws off migratory patterns of MANY birds, and is often in violation of the MBA (which also covers migratory mammals such as bats.) Add to this the new Fisher development, and you may as well kiss goodbye the migratory nocturnal creatures of this area, bats and owls. As well, houses bring with them pet cats which roam loose and eat songbirds (protected under MBA), and power lines which are deadly to large eagles. SOME animals can live with development (such as crows) but many can NOT and that impacts diversity of species, which is a cornerstone concept in all ecological studies.

**Hydrogeology:** Climate change is often promoted as a governing factor in development. The Cheney/Fisher plat is only a short distance from Bainbridge Island, and a very thorough study of that island and aquifer system has already been done, and is on file.

<https://pubs.usgs.gov/sir/2011/5021/pdf/sir20115021.pdf>

<https://www.bainbridgewa.gov/DocumentCenter/View/14968/GW-Fact-Sheet-Final-052121>

We don't know what the future will bring; *ours is not an infinite aquifer*, and it services not only Bainbridge, but the entire region of Illahee and the Manette peninsula. The study plainly states that septic returns form part of the aquifer recharge system of our area. A sewer system to the Fisher development will take that water away from the aquifer, and run-off will increase urban toxic dumps into Dyes Inlet.

This Comp Plan update is now trying to forecast to the year 2044. In the Aquifer Plan, pg. 77 plainly states that the greater the population growth, the lower the aquifer. That's common sense. There is a clear correlation of ground flow from springs and precipitation. Taking out this massive stand of Enetai trees will alter aquifers for the entire region.

There are also stormwater concerns. From casual observation, right now, around a third if not more of the storm-water run-off from the Viewcrest neighborhood is "dumped" into the Fisher plat. Adding 189 units will accelerate erosion, and will take along all the toxic lawn and road run-off from the Fisher housing tract to the Sound, which is already seriously polluted.

ALL Puget Sound builders know our type of soil (glacial till) is not conducive to absorption, water runs off, and the lodgepole pines in the region are needed to slow the rain as it falls, as well as aid in absorption to the aquifer through transpiration from leaves. This is a common situation here; we have massive rainfall events and trees slow the erosion on sheer slopes. A simple look at the LIDAR of the Fisher-Cheney plat will fully illustrate this situation; the Enetai slope shows visual evidence of old landslides in this region. The entire Puget Sound region is known for landslides, often due to poor planning in developments. No one should need to be reminded of the terrible tragedy in Oso, Washington on March 22, 2014, where forty homes were covered in a massive landslide, and 43 people died. Puget Sound is ALL susceptible to land-slides; I have attached three articles from geologically recent slide events right here in Kitsap County. No one knows what tips a slope to slide, but some of us live on Viewcrest, and don't want to be on the slope next to the Fisher plat when we find out. There is already one collapsed road on the Fisher property.

The landslide which covered Hwy 166 in Port Orchard continues today, during heavy rains, as anyone who travels that road is well aware. Considering the layered nature of the land (ref Bainbridge Island Aquifer study) it can happen here too. This is nothing to treat lightly, there should be a comprehensive study of the Fisher plat by a competent impartial hydrogeologist prior to any ground breaking.

The County has a *Buildable Lands Report* and other documents concerning environment all over their website:

*Are we merely giving this lip service?* It is not just the “birds and Bambis” we are concerned about. The preliminary report on this potential development discusses removing trees to “improve the view” therefore these homes will NOT fall into the “affordable housing” concerns of the county. They will be high end “with a view” after the trees are removed, and affordable by few in this current economy. As a resident to the north of this plat on Viewcrest (the same geological terrain, perhaps more stable from LIDAR evidence) the county should be aware of the longitudinal issues of homes on this slope. Ms. Schultz’s home, built in the 60s, is showing signs of settling, apparently the house was built on top of a filled gully. It’s livable for now, but what about the future? To the east downslope, her neighbors have water intrusion in their daylight basement during heavy rains. Other people further down the slope have had foundation problems, and the only home built here recently needed a massive cantilever to stabilize the structure; they sold their home within two years of completion. The Viewcrest neighborhood is zoned at four to an acre. Filling gullies and slapping in nine homes to an acre on the same terrain is NOT appropriate for this area. The proposed development is on the top ridge, and the run-off will be eroding all the way downhill, unless mitigation of septic, settling ponds, bioswales and rain gardens are put in place.

**Community Concerns:** Almost 200 new units will bring more families to the area. Can emergency services cover this? We have ongoing mail theft on Viewcrest now, and no police coverage. We are missing an elementary school in Manette and this will mean that children K-5 grades will have to be bussed a considerable distance. We wonder if Bremerton has planned for this influx of students, and how they feel about little ones having to get up early to catch the bus? Viewridge and Arman Jahr need to be rebuilt as it is. Everyone, get ready for more bond issues.

Above all, with the constant drumbeat of the UGA, we citizens KNOW that “we need housing” is a weak argument in the Bremerton area; a statistic I pulled from the firehose of information on line is that Bremerton has reached around 136% of the 2036 target date for growth; pushing that date to 2044 won’t change the fact that the growth mandate in the Bremerton area has been FULFILLED. The push by the County for development is unsupported by clear or convincing facts and figures, the only people development will benefit is developers, and the Cheney-Fisher development will NOT be affordable housing. Any city planner worth their salt knows when you run out of land, you put in affordable housing far from the city core, then provide rapid transit for workers. Rather than pushing inappropriate development and destroying the urban greenbelts with zoning tricks, the County should perhaps start planning an electric monorail to the shipyard.

The Cheney-Fisher Plat has been sitting undisturbed for over 100 years, and presently shows a wide diversity of species, as indicated by more than seven species of mushrooms spotted during casual walks through the Enetai forest, and the six-story lodgepole pines which cover much of the area. It’s a lovely little wild area with potential for passive recreation. We citizens moved here, and live here for a reason. *We don’t like concrete, we like trees. Our County is enabling the creeping destruction of greenbelts.* Kitsap county is being preyed upon by out-of-state

developers who have bought cheap land and want to make a massive profit by destroying our communities, not understanding the unbuildable nature of much of that "cheap" land which is cheap for a reason.

One civil engineer when informed of this, commented **"You'll find creatures like eagles often live in places unbuildable for people, because sheer cliffs near the ocean are perfect for THEIR lifestyles."** In a nutshell, that is our concern. The land is not suitable for nine units per acre, nor is it suitable for massive tree removal.

We would beg the County to reconsider their erroneous zoning of this parcel; lowering the density will not impact the "population pressure" on county housing needs in the slightest. We would urge adoption of the most environmentally protective version of the update to the plan.

Regards,



Christie Schultz  
Secretary and Science/Biological Consultant  
"Save Enetai"

Find attached: three articles regarding landslides in Kitsap, complaint TO Fish and Wildlife, and email FROM Fish and Wildlife.





josie cuervo &lt;josiec5150@gmail.com&gt;

---

**save enetai links**

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**Henderson, Alexia (DFW)** <Alexia.Henderson@dfw.wa.gov>  
To: josie cuervo <josiec5150@gmail.com>

Wed, Jan 17, 2024 at 12:00 PM

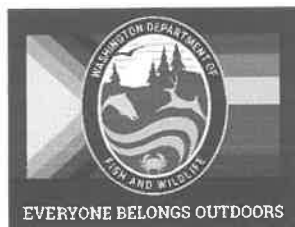
Thanks for that clarification, Christie. I was able to locate the area you mentioned (just South of 30<sup>th</sup> street). I ran a priority habitat and species (PHS) search and the only observed PHS species would be the purple martin and bald eagle the on that location and the surrounding parcels. I've found two surveyed bald eagle nests that were mapped in 2005, prior to the removal of bald eagles from the Endangered Species List. It does appear from lidar mapping, that there may be a few streams that are typed on DNR's website as unknown or non-fish. However, these designations have not been field-verified to my knowledge. There are also non-PHS listed species at this location, specifically: birds such as the American crow, the American robin, black capped chickadee, house finch, pileated woodpecker, rock pigeon, and stellar jay and the Western pond turtle.

Additionally, the nearshore is mapped surf smelt spawning habitat and adjacent to documented sand lance spawning habitat and a historic embayment is mapped.

I do not have any recommendations about the qualifications of the biologist that does any survey work as the Department is not requiring you to complete any survey work. I would recommend that you reach out to whomever will be the recipient of the survey work that you are completing to inquire about the qualifications of the Biologist. Additionally, if you are not the landowner of the properties that you wish to survey, I would recommend that you reach out to them for landowner authorization prior to conducting any survey work.

I hope this is helpful!

Thank you,



**Alexia Henderson** (she/her)

Area Habitat Biologist, Habitat Program

Washington Department of Fish and Wildlife

Alexia.henderson@dfw.wa.gov

360-620-3601

02  
Save Enetai  
2811 Rozewood Drive  
Bremerton WA 98310, USA  
saveenetai.org

Feb 20, 2024

Washington State Fish and Wildlife  
Attention: Alexia Henderson  
510 Desmond Drive SE, Suite 102  
Lacey, WA 98503-1263

Dear Sir/Madam:

Our intent and purpose of writing is to bring attention to the flagrant disregard of basic environmental statutes by unprofessional behavior on the part of Kitsap County, and more specifically in regards to building permit application 23-05658, and failure on the part of the Kitsap County Department of Community Development together with the Kitsap County Comprehensive Plan Update to recognize certain serious environmental concerns on the Cheney-Fisher plat of east Manette Peninsula.

We live near the plat involved with 23-05658, Ms. Schultz resides on Viewcrest Drive, to the north of the area of concern, Ms. Lustig lives south of the Fisher Platt. Ms. Schultz is certified to teach Biology as well as General Science in the state of Washington, she also holds a Master of Science degree, and has lived on Viewcrest since May of 2001. We both have had many years to observe the flora and fauna of the area, from Illahee Preserve down to Manette, and we see eagles all the time in this area. The Cheney-Fisher property is a patch of true wildness, only for hardy hikers, because it is so remote and untouched. Lynxes, owls, deer and large predators have been sited in the area over the years; and it's perfect for eagles, being not only close to the sea, but very private.

"Save Enetai" would like to lodge a formal complaint against the County of Kitsap for what we feel was a grievous error in their environmental data collection and storage on their website, which is a guiding force for all land developers in Kitsap County. In Fall of 2023, our non-profit was made aware of plans to develop the former Cheney Estates, now owned by Mr. Fisher, who has plans to develop a fairly high density housing tract (nine to an acre) on this plat. In his preliminary presentation of this future development, he mentioned as well, that the development will necessitate the "removal of trees" to enhance the view for his apparently high-end homes.

At the time, the Kitsap County website showed two eagle nests on this property, which of course falls under Washington State Bald Eagle Protection Act, RCW 77.12.655 and Bald Eagle Protection Rules, WAC 232-12-282, the Federal Eagle Act (16 U.S.C. 668-668c) and Migratory Bird Act (MBTA 16.u.s.c 703-712.) There are many involved studies, reports, regulations and PLANS which MUST be followed regarding ANY construction, development and major human activity around eagle nests and habitat. Eagles are no longer endangered, but they are considered vulnerable under PHS (Priority Habitat and Species.) These eagle nests are also referenced in Team 4's preliminary reports.

A month or so after being made aware of the impending Fisher development, we did a scouting walk around the general vicinity of where the eagle nests were indicated on maps, October of 2023. The lodgepole pines there are in excess of six stories tall, and have heavy foliage, which makes it impossible to identify anything in the super-canopy of the forest. We did however, hear two eagle calls, which seemed to be of a quiet "alert" nature, a chirping-flute call. On February 3, 2024, we repeated our

exploration walk, and heard MORE, repeated eagle calls, over the period of an hour. We also sited with binoculars a nest, right where it is located on the Team 4 preliminary maps. We have innumerable reports from residents of Rozewood Estates and the shoreline neighborhood below the Fisher Platt, that they see eagles ALL the time, on the beach eating. The eagles ARE using this Enetai forest area for their every-day activities.

Regulations state that ANY activity (development, logging etc) MUST be from one to two football field lengths away from identified eagle habitat, such as nests. At present, the Team 4 maps do not bear this out, and we have yet to see any "eagle plan" in Team 4's preliminary reports, as mandated by the State of Washington.

For those who do their homework, as per WDFW, it must be actively documented that the whole territory (not just the nest) has been abandoned for a full five breeding seasons prior to determining the area is not an "active eagle nesting site." Kitsap County has not repeat NOT done any of this, therefore they cannot (though they apparently DID) dismissively wipe a document off their website as "old information" when it comes to eagle habitat. Fish and Wildlife still has these nests documented, and eagles still live in the area, the facts have not changed. "Facts are stubborn things."

We feel that destruction of data like this on the part of the county, shows a bias favoring developers, and a blatant disregard for parameters put forth in documents such as the *Buildable Lands Report* for Kitsap County, as well as other ecological laws and regulations supposedly espoused by Kitsap County. In the end, the environmental regulations, which have been hard fought for by concerned citizens all over our country, our state and our county, are useless, for as soon as someone wants to develop the land, it is all quickly proven to be mere lip-service.

This defeats the entire purpose of civic planning, which is: Mankind likes to live in an aesthetic world, not in a concrete jungle. We all came to Washington State because we enjoy nature, not because we love cracker-box housing. We have to fight tooth and nail for every inch of green belt, and it NEVER ends.

We would appreciate Fish and Wildlife looking into this matter, for there may be other areas of concern which have also been casually altered by Kitsap County. It's certainly a nice thing for the minority of citizenry called developers, but messed up for the rest of us. Considering EVERY American has known for decades that eagles are "hands off" when it comes to development, I sometimes wonder where the moral compass of our government and leadership really is these days. The government works for the CITIZENS, not the other way around.

Please see attached email evidence.

Regards,

Save Enetai

President: Kathie Lustig

Secretary/Biological consultant: Christie Schultz

CC: Kitsap County Comprehensive Plan

## LOCAL NEWS

# Update: Highway 166 Near Port Orchard Open Again



State Department of Transportation employee Wayne Noll cleans up debris from a mudslide that closed Highway 166 near the Port Orchard Yacht Club. (LARRY STEAGALL | KITSAP SUN)

*By Josh Farley of the Kitsap Sun*

*Jan. 08, 2009*



Torrential downpours overnight caused mudslides and flooding in several areas in Kitsap and Mason counties, forcing road closures.

Highway 166 between Port Orchard and Highway 16 reopened shortly before 4 p.m. after having been closed all morning because of a mudslide, according to Washington State Patrol dispatchers. The slide occurred directly across from the Port Orchard Yacht Club ? the same place where the hill gave way during the Dec. 3, 2007, flood.

## LOCAL NEWS

# Illahee Road Reopens to Through Traffic, 10 Months After Washout

*Oct. 16, 2008*

## CENTRAL KITSAP

Traffic is flowing again over the portion of Illahee Road lost in last December's storm. Although some finish work remains to be done, the stretch between Brownsville Elementary and University Point opened Thursday afternoon.

The record-breaking Dec. 3 deluge washed out a swath of street 120 feet long and 45 feet deep, taking with it an 18-inch, 70-year-old culvert.

Contractor RV & Associates of Port Orchard replaced the culvert with a new corrugated metal one that's 10-foot-wide and allows fish to pass, said Kitsap County Public Works spokesman Doug Bear. Gravel and boulders were placed in it to replicate a stream bed. About 18,000 cubic yards of material was needed to fill the hole around it.

The project cost \$591,000, Bear said. Most of it will be paid for with federal funds. The money comes with a time-consuming permitting procedure, however, that stretched the project to more than 10 months. The county began designing the replacement culvert immediately after the storm, but the contractor didn't begin work until August. Once RV & Associates got on site, it needed just 40 working days to complete the job, Bear said.

"It's been a challenging project," said Kitsap County Commissioner Josh Brown, who took heat from residents frustrated by the delay. "I know it's



## NEWS

# North Kitsap homes evacuated after landslide



**Nathan Pilling**

Kitsap Sun

Published 10:13 a.m. PT Jan. 5, 2021 | Updated 8:54 p.m. PT Jan. 5, 2021

**Editor's Note:** Were you one of the residents of Seclusion Cove Way who had to be evacuated? Contact reporter Nathan Pilling at [nathan.pilling@kitsapsun.com](mailto:nathan.pilling@kitsapsun.com).

**NORTH KITSAP** – Residents of eight homes north of Poulsbo had to be evacuated Monday night as a landslide threatened their neighborhood along Hood Canal. The landslide came following several days of heavy rains throughout the Puget Sound region.

No injuries were reported following the incident.

Puget Sound Energy cut power to homes in the area threatened by the landslide, which destroyed a boathouse and did some damage to one home along the water, according to David Kinley, Kitsap County chief building official.

Damage to the hillside along Seclusion Cove Way, a private road that runs down to Hood Canal near near Breidablick could be seen Tuesday, and aerial images showed that a swath of the hillside had fallen. Damage could also be seen under the narrow roadway used to access the homes along the water.

Kinley said the area would be assessed on Wednesday: "We'll get out there and see what kind of movement we've seen with this rain event and ascertain what kind of slope stability we have there," he said. "If we can get 3/4 of an inch of rain and don't see too much more movement, we can be hopeful that it's done moving at this point in time."

"Our ultimate concern is the safety of the occupants of these houses for the life of the building. We want to make sure that we're doing our due diligence to make sure that they'll be safe in their home."

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My name is Charlie Michel, I live in Bremerton. I am a retired Petroleum Engineer who has worked in oilfields around the world. I know how hard it can be to access increasingly difficult deposits. In many places it's a messy endeavor, and the joke was that there is more oil on the ground than in the ground. Extraction and transportation come with an unavoidable but finite amount of risk, such as the Exxon-Valdez tanker spill and the Macondo Gulf of Mexico blowout.

We squander this amazing resource by burning it as fuel in motor vehicles. This is a promiscuous use of hydrocarbons considering that alternative fuel sources such as clean electricity are available. I would like to see our county commit to purchasing only electric vehicles for the future. No more internal combustion engines! The Washington State Department of Commerce has grants available for charging equipment. We need to stop "burning stuff", especially when such easy alternatives exists, especially ones that save us money in the long run. Our back is up against the wall concerning climate change. We must stop burning stuff not just in transportation, but every aspect of the comprehensive plan from parks to zoning. We need to start acting like our house is on fire- because it is.

Further, we can take vehicles off the road if we build bicycle infrastructure, what are termed bicycle facilities. This means bonafide bike routes with a minimum of four foot, marked bike lanes. And that is just the minimum standard; our surrounding counties do much better than that. It reduces the number of all cars on the road when people feel safe enough to venture forth on a bicycle. With the advent of electric bicycles, hills no longer matter, so that excuse for the lack of bike facilities isn't good enough anymore. What we have now in this county are short, unconnected, "bike lanes to nowhere" created opportunistically as part of a road project. Instead, we need separately funded bicycle facilities such as a north-south route from Pierce County to the Hood Canal bridge.

Charlie Michel

6088 Kingfisher Ct

Bremerton, WA 98312

(360) 710-0616

[Return to Comment Matrix](#)

Save Enetai is a registered non-profit in the State of Washington however we do not yet have our Federal 501(c)(3) tax exemption letter from the IRS. This process may take time and \$\$\$. We are in the process of taking Save Enetai under another 501(c)(3) fiscal umbrella to assure donations are tax deductible. Contact us for more detailed information.

☒ YES! I want to add my name to letter of support to AMEND the "Illahee Community Plan" to include the Enetai Community!

☒ YES! As a resident of Rozewood Estates, I want to include my name on a petition to reduce my property zoning on my PARCEL to Urban Restricted Residential from Urban Low Residential.

☐ YES! I would like to donate \$25, \$50, \$100, \_\_\_\_ Mail a check or DONATE NOW via GO FUND ME

NAME JUANITA M. PAULSON EMAIL -

ADDRESS 3028 KEEL AVE. NE CITY/STATE/ZIP BREM. WA 98310

COMMENTS NO NEW DEVELOPMENT - WANT TO  
STAY RURAL - LOW RESIDENTIAL

**GO TO our website at [SaveEnetai.org](http://SaveEnetai.org)**  
Kathie Lustig, 2811 Rozewood Drive, Bremerton, WA 98310

[Return to Comment Matrix](#)

## **Dave Wixson Anna Rd Reclassification**

[Davew@tmsmetalizing.com](mailto:Davew@tmsmetalizing.com)

**(360) 509-8660**

My reclassification request relates to 5 parcels on NE Anna Rd (off Central Valley Rd).

### **Property Information**

Property Owner: David and Carolyn Wixson

Address: 126 NE Anna Rd Poulsbo, WA

2.46 Acre House Parcel Number: 022501-2-034-2000

10.69 Acre Parcel Number: 022501-2-007-2003

7.43 Acre Parcel Number: 022501-2-006-2004

12.08 Acre Parcel Number: 352601-3-024-2000

6.3 Acre Parcel Number: 352601-3-023-2001

**Total Acreage of 5 Parcels= 38.96 Acres**

- **Current Zoning is Rural Protection = 1 Dwelling Per 10 Acres**
- **Requested Zoning is Rural Residential = 1 Dwelling Per 5 Acres**

### **Comprehensive Plan**

- As stated in the purpose of the comprehensive plan for 2024 and similar to the results of what preferred alternative was selected in 2016, I am anticipating Kitsap County will focus on growth and redevelopment of our urban areas (alternative 2) and allocate less growth towards our rural areas.
- Eric Baker has referred to the specific choices made as more of a “menu” approach, and while there is a focus on growth in our urban areas, some parcels/projects from the alternative 3 list end up as part as the overall “selected alternative” as part of the process.
- The 2024 Draft Comp Plan sets a goal: 85% of population growth (between 2024-2044) to occur in the county’s UGAs, and 15% in rural zoned land. I am hopeful that my reclassification request can become part of the 15% allocation towards future growth in our county’s rural areas.

### **Overview/Justification:**

- The parcels legally abut parcels with the RR zoning we are requesting.
- Our neighbor next door also put in a request and is included on the alternative 3 map as well. He has similar land characteristics to us and is in support of our reclassification request.

- Rural Residential zoning will allow for just 3 additional lots and make it feasible for us to bring utilities down the 660' access road to our parcels.
- We are only requesting one zoning classification change 1/10 to 1/5 (not 1/20 to 1/5).

#### **Utilities on Anna**

- Anna Rd is served by Silverdale Water with a water main capable of serving these parcels.
- Anna Rd is served with fiberoptics.
- Some of our parcels already have underground primary power from PSE

#### **Critical areas**

- Our parcels can easily be described as “relatively unconstrained” by critical areas, a key phrase in the Rural Residential zoning purpose.
- We have equal or less critical areas than several other parcels on the Alternative 3 list as well as equal or less critical areas than parcels near us, that are already zoned Rural Residential - according to the Kitsap County Parcel Search “critical areas” overlay.
- Our 10.69-acre parcel has a small seasonal drainage ditch with moderate slope throughout the parcel. Multiple building sites on property that factor in county-imposed 100ft buffers from the critical area.

#### **Diversity of Housing stock and Employment**

- The new parcels would allow three new single-family homes as well as the potential for ADUs which could be rented and considered affordable housing, or the ADUs could help encourage multi-generational living.
- Since the parcels aren't part of a large-scale corporate development, small local builders will be able to secure the contract to build the individual houses. Small local contractors are often left out of the equation on large development projects.
- Rural residential zoning would create smaller, more attainable lots that families can thrive on & create small farms, live in an agricultural setting, and raise children that will have a yard to play in.

#### **Low Impact on Anna Rd Residents**

- Historical zoning and development trends on and around Anna Rd have resulted in many of the parcels near us to already be much smaller than our parcels.
- All parcels on the South side of Anna Rd. already have Rural Residential Zoning. This makes our request consistent with the current zoning already in our neighborhood. Our



parcels (if 5 acres each) would remain larger than over 75% of parcels that exist on Anna Rd NE. with the majority of the existing parcel size on Anna Rd Ne around 2.5 acres or smaller.

- All 5 parcels are owned by us and contiguous. The parcels all share the same 60ft wide 660ft long private access road, which accesses NE Anna Rd directly (a county-maintained road).

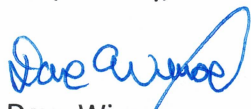
### **Low Impact on the Environment**

- Regarding vehicle emissions and climate change, which is part of the comprehensive plan update, our parcels are located just off of Central Valley Rd, and are in close proximity to many shopping/workplaces (10 minutes to E Brem, 10 minutes to Poulsbo, 10 minutes to Silverdale).
- Kitsap Transit has a worker-driver bus for Shipyard employees that has a stop on Central Valley Rd
- With the addition of just 3, 5-acre parcels across nearly 40 acres, our reclassification is not an example of excessive sprawl of our rural areas. As evidenced by the hundreds of outspoken citizens who have made public comments regarding the Island Lake reclassification request, Central Valley residents do not want to see Central Valley become urbanized. With our “Rural to Rural” zoning change, we will not be increasing the densities that currently exist within our rural zoning area. We simply want the same rural zoning that most Central Valley residents already have.

Thank you for your time and consideration. It is my hope that I, and other local property owners will be able to find success with their low impact rural to rural zoning requests. Many of us have been paying taxes on parcels like these for several decades.

Through the comp planning process you have asked for land use opinions from members of the community and Kitsap County property owners. I hope that through this planning process you can support our modest, minimal impact reclassification request.

Respectfully,



Dave Wixson

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# Kitsap County Non-Motorized Facilities Community Advisory Committee

Laura Westervelt  
Chair

Nathan Menefee  
Vice Chair

Jess Chandler

Richard Feeney

Janet Kidd

Scott Satter

Brian Watson

Jana Waldroup

Deborah Weinmann

February 28, 2024

Kitsap County  
Department of Community Development

RE: Non-Motorized Facilities Community Advisory Committee Comprehensive Plan  
Comments

To whom it may concern,

Please find below our comments on the Draft Comprehensive Plan. These comments have been carefully compiled and are in order of priority.

- (1) Add to **Transportation Policy 1.f**: Separate non-motorized projects from transportation projects in the Transportation Improvement Program (TIP) with the goal of increasing the priority for funding of non-motorized projects.
  - a. Alternatively, the current scoring system used to prioritize projects that gives vehicle movement 3 times the weight of non-motorized movement could be revised to give more weight to non-motorized movement.
- (2) Change **Transportation Strategy 4.b** to: Allocate funding and personnel to consolidate the existing Non-Motorized Facilities Plan with the proposed "Walk, Bike, Roll Facilities Plan". Reconcile any differences in goals and create one overarching document.
- (3) Add **Transportation Strategy 3.d**: Replace the existing 85th percentile rule for determining speed limits with whole picture alternatives that consider overall location context.
  - a. Give non-motorized users a seat at the decision-making table and placing greater importance on non-motorized development and projects.
  - b. Use creative ways to calm traffic, e.g. narrowing roadways, speed humps, etc.
- (4) Add **Transportation Strategy 1.1.a under Policy 1.1**: Designate a proportion of transportation funding for non-motorized projects. Measure progress against Non-Motorized Plan and produce an annual report (This is in the current Comprehensive Plan as Policy 41).

- (5) Include in **Capital Facilities & Utilities Strategy 1.c:** Inventory existing non-motorized/pedestrian facilities in Kitsap in a GIS map accessible to the public with the goal of using the data to equitably inject funding into the neighborhoods with the greatest need of investment.
- (6) Add **Transportation Policy 1.9:** Fund, design, and implement both a north-south and east-west non-motorized central pathway to provide access across Kitsap County.

We appreciate your consideration and are happy to address any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Laura Westervelt', with a long horizontal flourish extending to the right.

Laura Westervelt.  
Chair, Non-Motorized Facilities Community Advisory Committee

[Return to Comment Matrix](#)

# Is a “four-foot paved shoulder” a useful definition of a bicycle facility?

by Paul Dutky  
February 2024

The policy vision of every Kitsap County non-motorized planning document is to create a safe connected bike facilities network. Safety, and connections to other safe bikeways, is what makes any on-road facility useful to bicyclists.

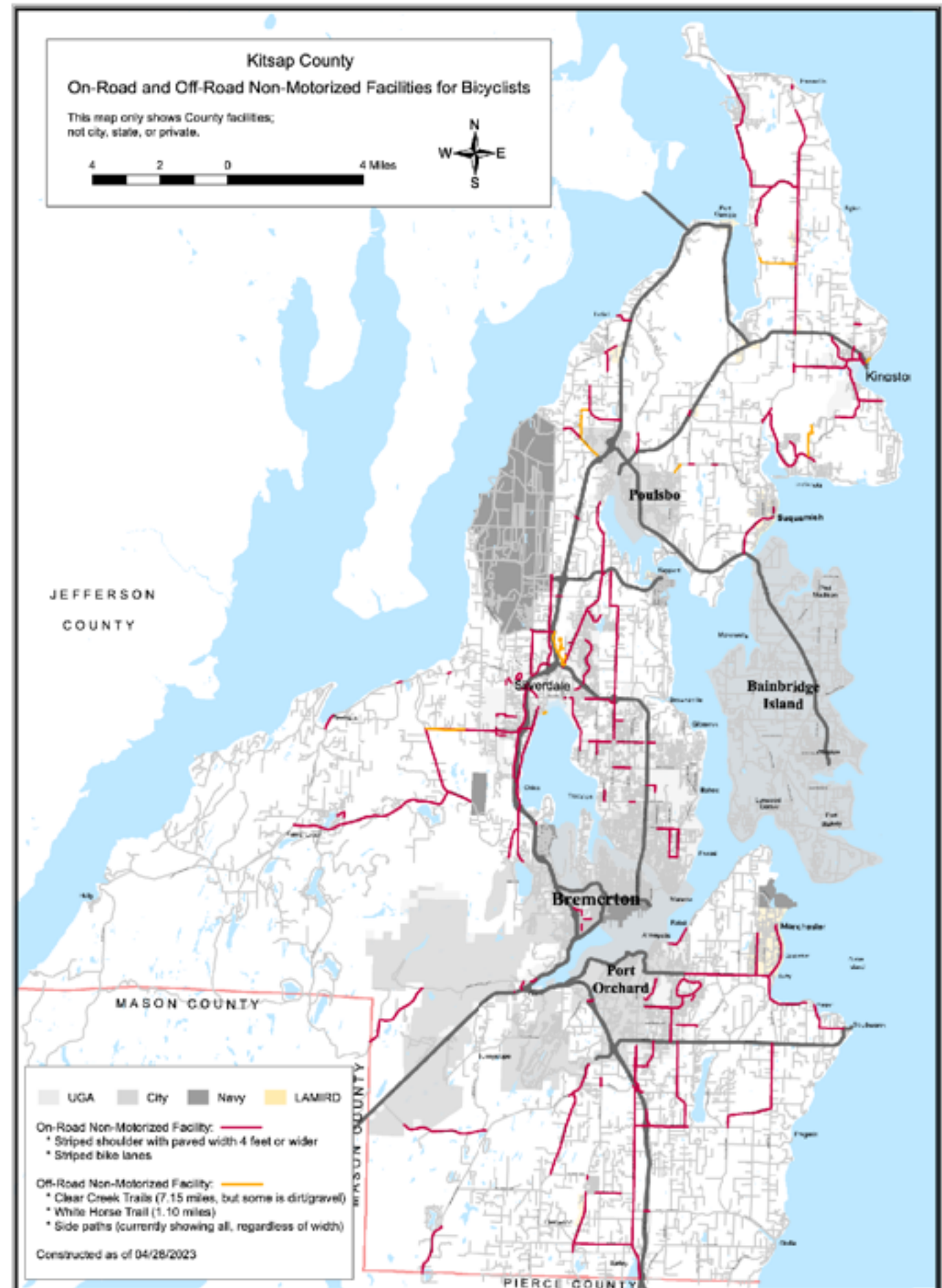
Recently the County produced a map of over 145 miles of County-maintained on-road facilities for bikes, defined as either 4-foot (or wider) paved shoulders or bike lanes. Bike lanes are easy to recognize, but a paved shoulder is a road characteristic that varies from place to place and is used by cars. This document examines all on-road facilities on the County map to determine how safe and useful “paved shoulder” is as a facility type.

Kitsap County states that the map at right shows at least 145 miles of on-road “facilities for bicyclists” (thin red lines). My analysis shows approximately 50 miles of this total does not meet the definition of a bike facility *as defined by the County*.

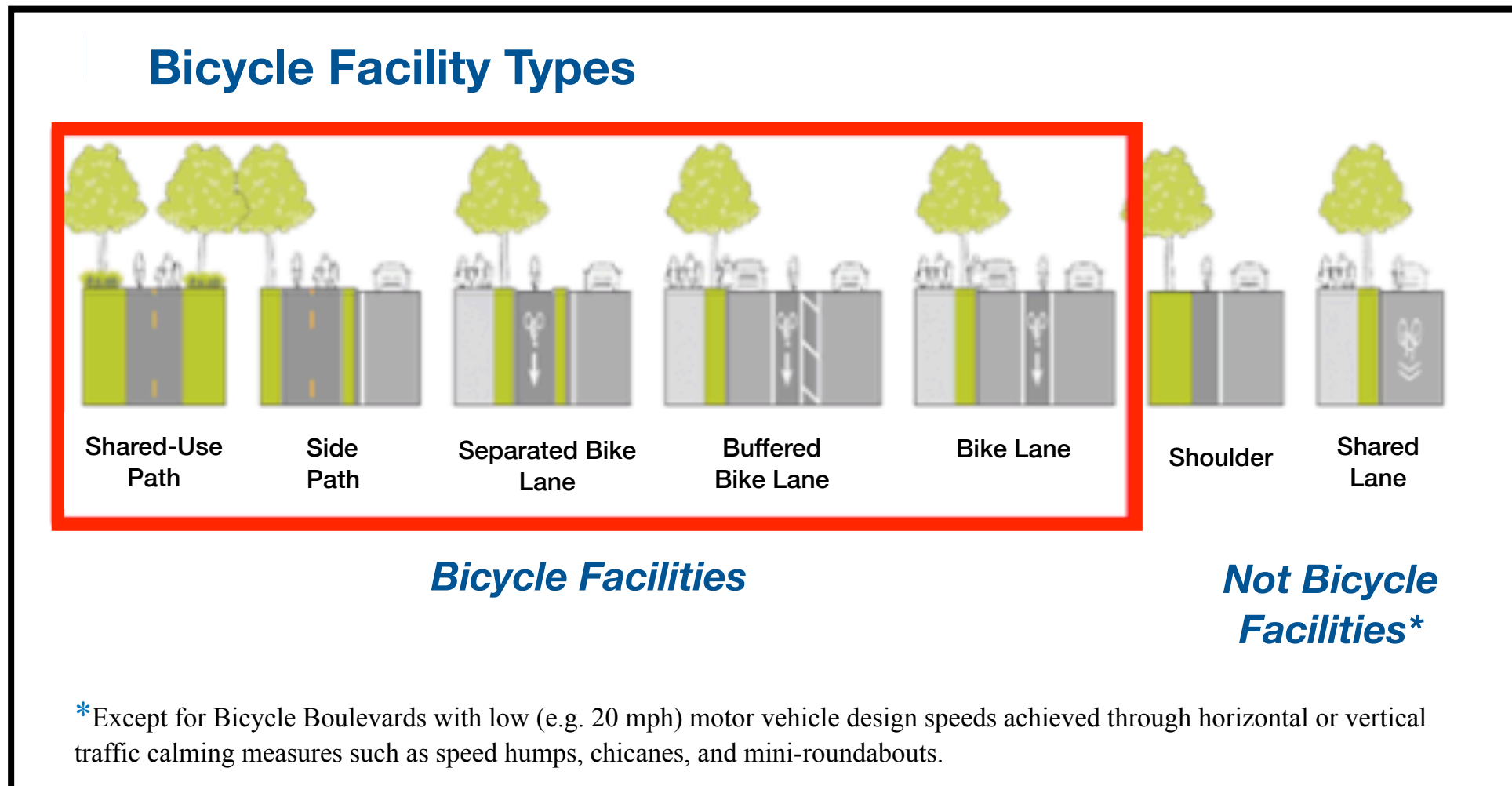
Vague definitions contribute to this confusion.

The disconnectedness is worse than shown at right.

Every line on the map at right deemed not to be a “facility for bicyclists” is evaluated later in this document with a picture and explanation.



We recommend the County adopt the definitions of “Bike Facility” used by WSDOT and USDOT, which are stratified by level of risk. The graphic below, taken from the National Highway Institute Course on Bicycle Facility Design, clarifies what is and isn’t a bike facility, shown left to right from most protected (safest) to least protected:



**The term “bike facility” should be meaningful to the users of bicycles, conveying a facility is safe to use. A connected network of such facilities is the stated goal of every Kitsap County Non-motorized Plan.**

Kitsap County states a 4-foot shoulder is a bike facility. This definition is not up to current standards for safety and is extremely vague, making it difficult to measure progress. Consider these problems with labeling a paved shoulder a bike facility:

- A paved shoulder on only one side of the road does not accommodate movement in both directions. Calling such a road a “bike facility” places users at risk by conveying such a road is safe in both directions when it isn’t.
- The width of paved shoulders can vary from place to place or disappear - forcing a sudden merge into the vehicle lane. Bike facilities, as defined by WSDOT have a designated space for the exclusive use of bicycles. Facilities are signed, and indicate a beginning and end. Riders and drivers understand where the other belongs, providing predictable, and therefore safer, cyclist movements.
- Cars can park in a paved shoulder . . . or drive there.
- “Four-foot paved shoulders” includes highways, highway intersections, and other hazardous locations. It can include short segments of road where shoulders are added during a culvert replacement, a bridge repair, or next to a new housing development. Such “facilities” do not contribute to cyclist safety or the connectivity of a bike network.
- Wide paved shoulders are considered useful on high speed rural roads, but the Kitsap Peninsula is no longer considered rural, it is suburban and urban. WSDOT-defined bike facilities are far safer and more appropriate in Kitsap County.



## **What can be done to improve on-road bike safety in our county?**

Adopting WSDOT bike facility definitions will provide County Commissioners meaningful measures of progress toward creating the bike facilities described in comprehensive plan documents. An annual report on miles of each objectively measurable type of bike facility (bike lanes, buffered bike lanes, separated bike lanes, cycle tracks and shared use paths) and their location will help administrators keep their various agencies on track and accountable.

A Level of Traffic Stress (LTS) analysis is increasingly being used nationwide to evaluate bike facility networks, and should be adopted by the County to objectively analyze the developing bike network. LTS defines bike facilities the way WSDOT does, and maps bike networks by how stressful a facility feels to cyclists.

From a bicyclist's perspective, contrast the value of a map derived from an LTS analysis with the Non-Motorized Routes Map in the current Non-Motorized Plan. The LTS routes map will show connectivity and level of safety, whereas the County's "routes map" makes no distinctions regarding level of safety, connectivity, or the status of a route (whether it is aspirational, planned, or currently exists).

# Kitsap County's definition of bike-related terms.

from the 2013 and 2018 Non-Motorized Plan

County definitions shown in red. My commentary is shown in blue.

***Bicycle Facilities*** – A general term denoting improvements and provisions to accommodate or encourage bicycling, including parking and storage facilities, and **shared roadways not specifically defined for bicycle use.**

Any road that a bicycle can ride on is considered a “bike facility” by this definition, even if unsafe for users.

***Bikeway*** – A generic term for any road, street, path or way which in some manner is specifically designated for bicycle travel, **regardless of whether such facilities are designated for the exclusive use of bicycles or are to be shared with other transportation modes.**

Any road can be considered a “Bikeway” by this definition, and be “designated for bicycle travel”, even if unsafe for bike users.

***Bicycle Route or Bike Route*** – A roadway or bikeway designated by the jurisdiction having authority, either with a unique route designation or with Bike Route signs, along which bicycle guide signs may provide directional and distance information.

The jurisdiction having authority (Kitsap County) can designate any road a bike route by this definition, even if unsafe for users.

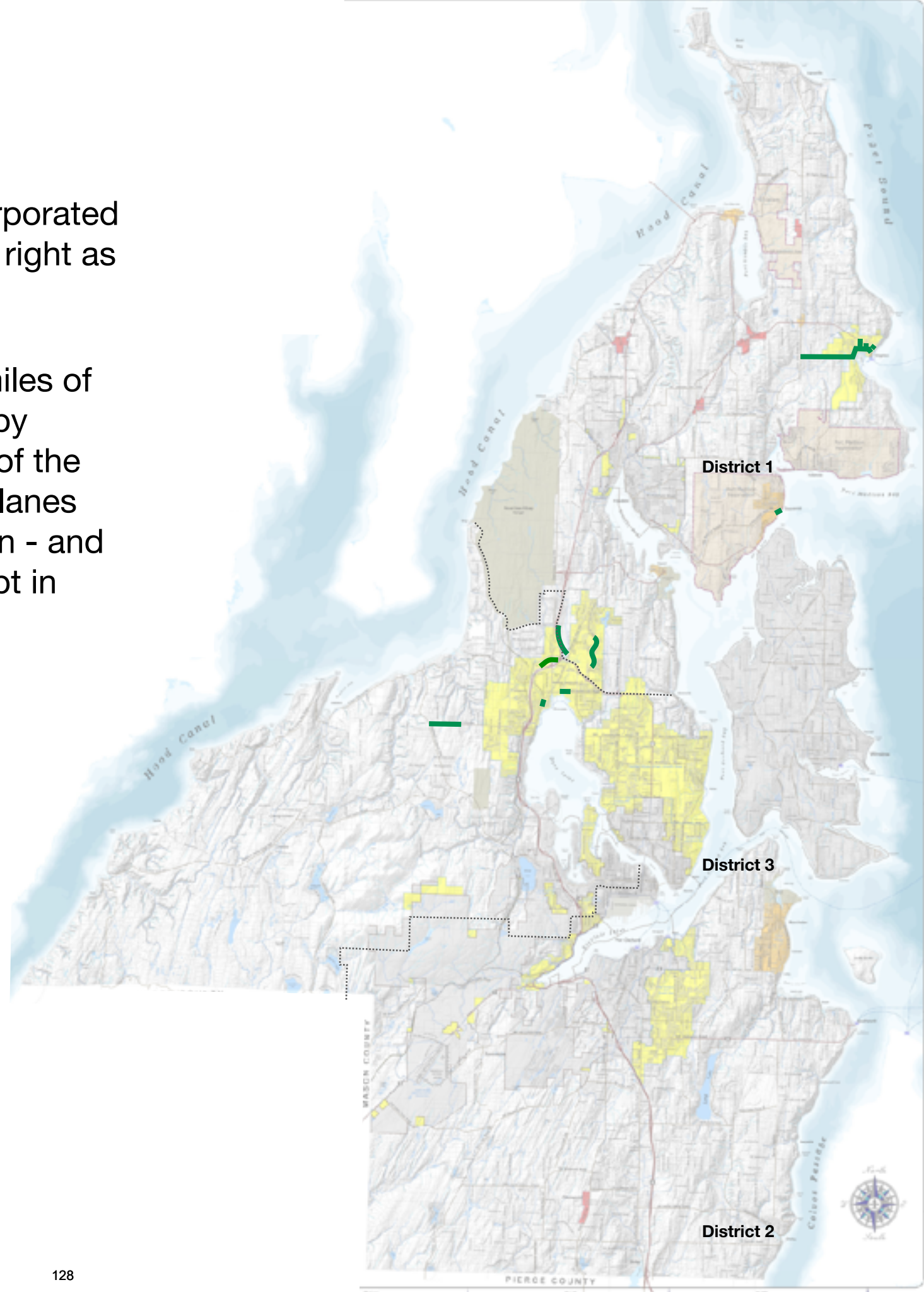
***Deficient Roadway or Segment*** – A roadway or portion thereof that is currently constructed with insufficient road shoulders or other facilities for non-motorized transportation that may create safety issues.

Any roadway that doesn't have 4-foot paved shoulders can be designated a deficient roadway or segment, even when it is not part of a bike network or bike route in County plans.

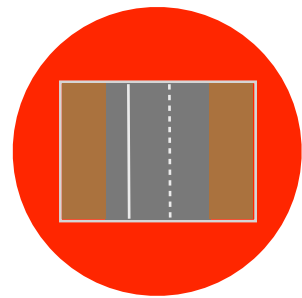
Non-standard definitions can be confusing and mislead readers. Vagueness and ambiguity contribute to Kitsap County's unsafe road conditions for bikes. If your NMP definitions don't change, Kitsap roads will remain, for the most part, hazardous for bike users.

WSDOT-defined bike facilities in unincorporated Kitsap County are shown on the map at right as thick green lines.

These 3.4 miles of bike lanes, and 2.6 miles of shared use paths (built and maintained by Kitsap County) constitute less than 2% of the 340 miles of shared use paths and bike lanes prioritized in the 2001 Bike Facilities Plan - and they don't connect to one another except in Kingston.

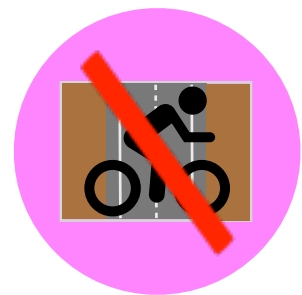
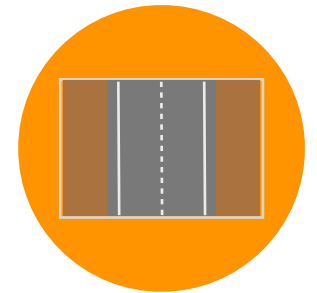


The following photographs of Kitsap County road shoulders shows a need for clarity in the county's definition of bike facilities. They are divided into the six categories, as below. Six selected examples (starred in the upper right hand corner) are shown first.



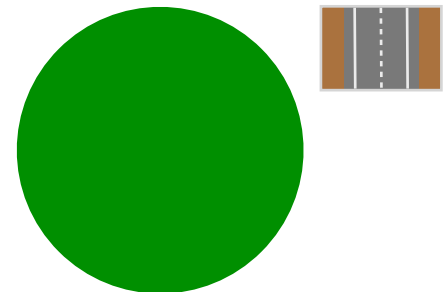
Roads with a 4-foot paved shoulder, but on only one side of the road - red

Roads with two paved shoulders, but not 4 feet in width - orange

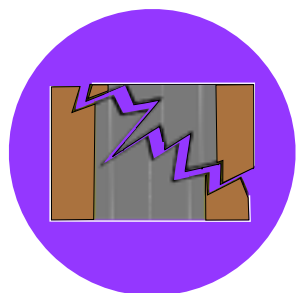
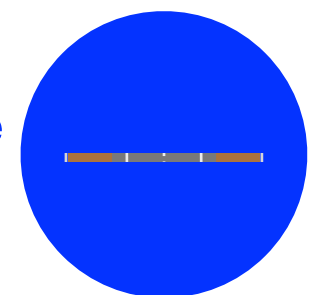


Not a bike facility for other reasons - pink

Facility not built and/or maintained by County - green

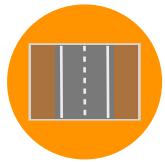


Opportunity Project: A short road project that adds paved shoulders. Most contribute nothing to a bike network since they are road repairs/additions chosen without regard to bike connectivity - blue



County "bike routes" that have been compromised by road projects - purple





## Banner Road

District 2



Banner does not have consistent 4-foot shoulders



Much of the road does have shoulders slightly wider than three feet on both sides of the road, but this is not consistent.







District 3



Seabeck Hwy at Big Beef Creek.

There is a very wide shoulder on one side of Seabeck Hwy where several small businesses are, just west of Big Beef Creek. However, there is no shoulder on the other side of the road, where there is a ditch. Vehicular speeds here are high. The majority of Seabeck Hwy has no shoulder at all.







District 3

## Trigger Avenue



Trigger Avenue has wide shoulders, though speeds and lane width give a freeway feel, especially adjacent to the SR 3 freeway interchange. This is not a safe place for bikes.

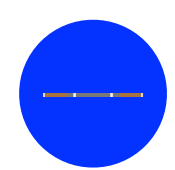


The Kitsap County 2013 Non-motorized Plan includes all 90 miles of state highways in its list of County bike facilities, because they *usually* have wide paved shoulders.



“Paved shoulder” as a definition makes no distinction regarding the hazardous nature of the location: highway intersections, high speed roads, steep grades, or freight corridors.





District 2

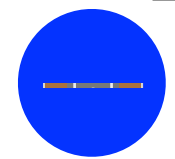
Opportunity Project: A short road project that adds paved shoulders. Most contribute nothing to a bike network since they are road repairs/additions chosen without regard to bike connectivity - blue



### Ollala Valley Rd

This bridge over Ollala Valley Rd was constructed to improve safety for motorists at this intersection with SR 16.

The “facility” drawn on the County’s map is the wide paved shoulders underneath SR 16 (white arrow). No bike facility connects to this state highway project.



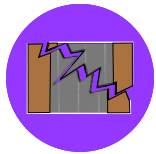
District 3

### McWilliams Road

There are two new developments on McWilliams that built sidewalks and paved shoulders for the length of the new development only. The other side of the road has a one-foot shoulder that drops into a ditch. No bike facility exists on either end of this development.







District 3

## County “bike routes” that have been compromised by “road” projects

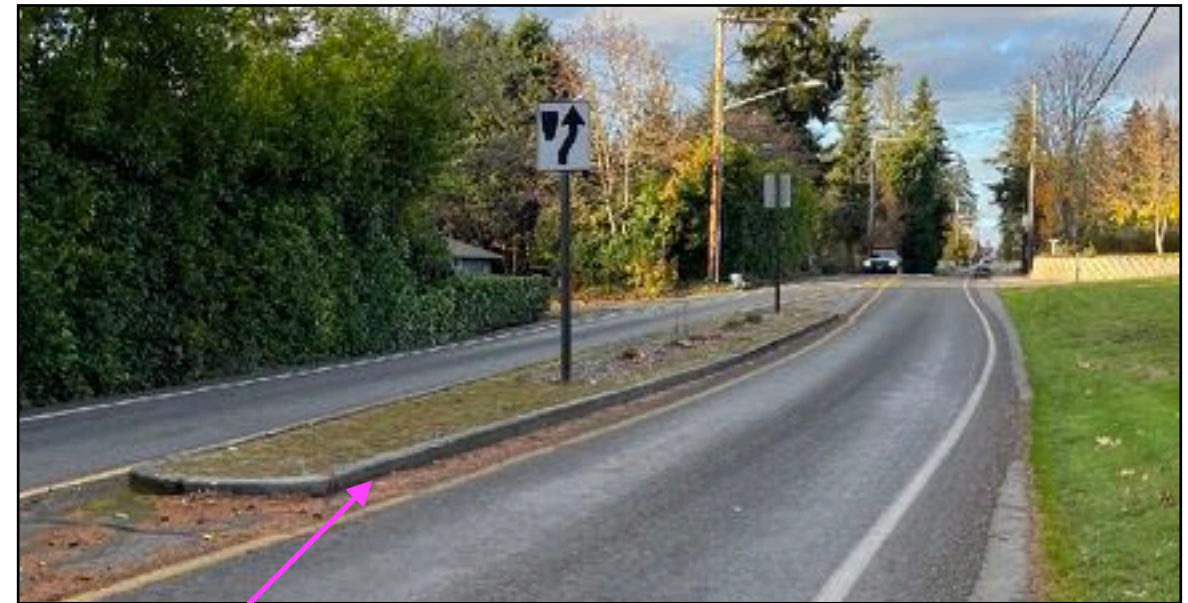


Tracyton Blvd - 1.6 miles between Fairgrounds Rd and Bucklin Hill Rd

Tracyton Blvd in this location has four-foot shoulders, except in the location of seven splitter islands. These make the road safer for motorists but more hazardous for cyclists, because the paved shoulders significantly narrow in these locations.



paved shoulder less than 3 feet

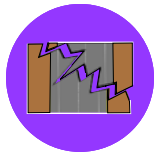


Splitter Island



paved shoulder less than 2 feet





District 1

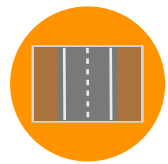
## Viking Way, Scandia intersection (signed County bike route #31)



Viking Way has 5- to 7-foot paved shoulders north and south of this T-intersection with Scandia Rd. A center left turn lane was added to make left turns into Scandia for motorists safer. However, the width of the road was not widened sufficiently to maintain a safe shoulder width for cyclists. The paved shoulder narrows to two feet on both sides of the road in this location.



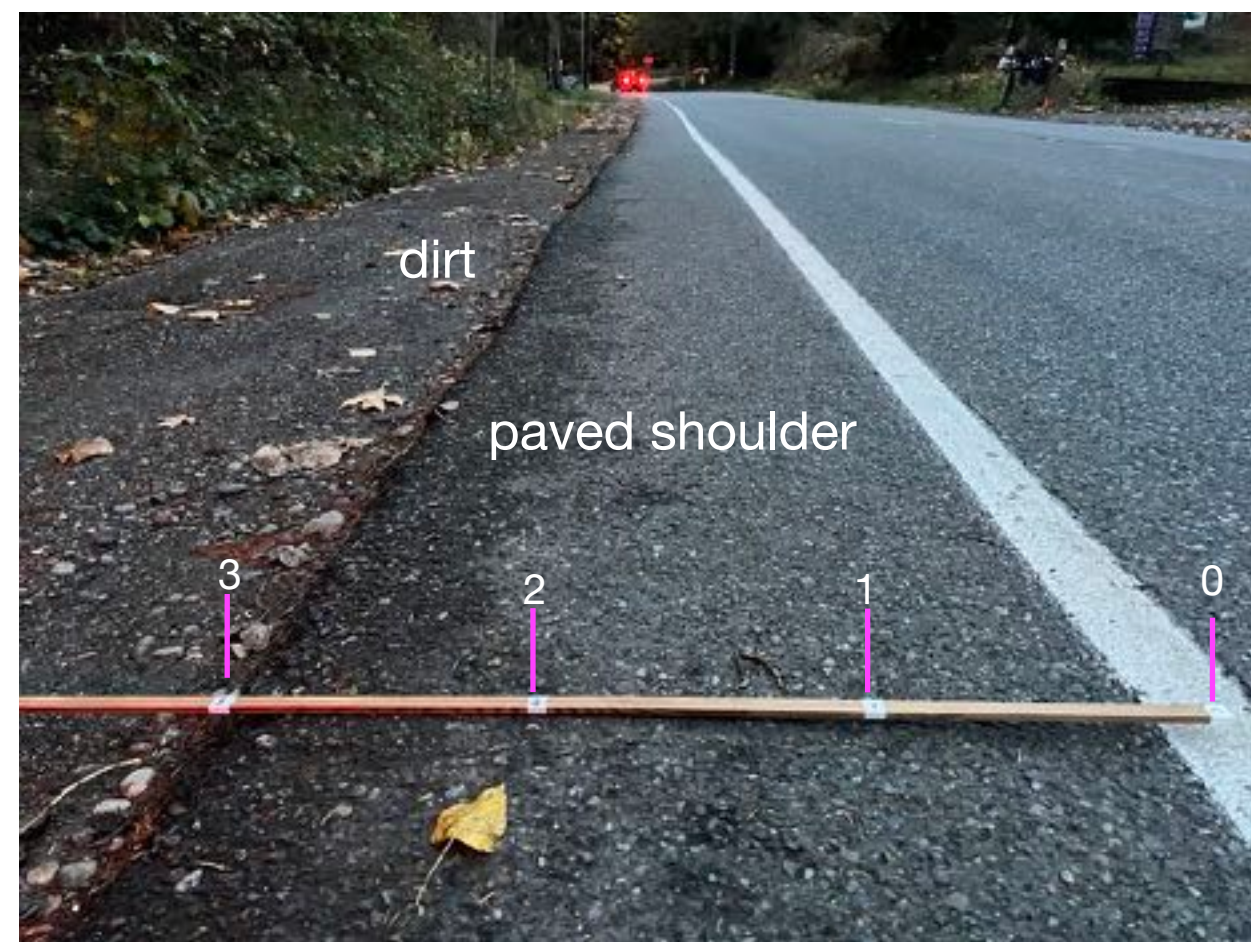




District 1

Roads with two paved shoulders, but  
not 4 feet in width - orange

Big Valley Rd has 3 foot shoulders in  
the location indicated on the County's  
map, not 4 feet.



east side of road



west side of road





District 3

## Riddell Rd between Pine Rd and Ridgemont Drive



Riddell Road in this location has less than 4-foot shoulders on the south side of the road . . .



... and two dangerous depressed storm grates with narrow irregular shoulders on the north side of the of road.







District 1

## Thompson Road

Thompson Rd has two paved shoulders which are consistently less than 4 feet in width. Paved shoulders adjacent to curbs or guard rails are supposed to be 5 feet wide.







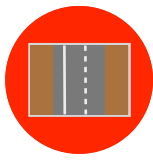
District 1

## Jefferson Point Rd

There are 3-foot shoulders on Jefferson Point Rd, sometimes less, almost nowhere 4 feet. Not a bike facility by Kitsap County's definition.







Roads with a 4-foot paved shoulder, but on only one side of the road - red

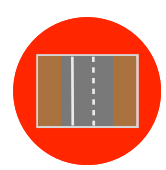
District 1

## Barber Cut-off Road, Kingston

There is a paved shoulder on one side of Barber Cut-off Road, but none on the other side for the entire length of the road. “Paved shoulder” does not specify if the shoulder is continuous or interrupted, or if the paved shoulder is on both sides of the road. If the road accommodates cyclists traveling one way, but not the other when returning, it is not a bike facility.







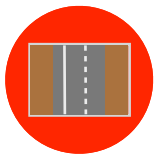
District 3

# Caitlin Street adjacent to Eldorado Blvd

There is a shoulder on one side, but not the other. This arrangement is common in County residential communities where there are no sidewalks.







District 1

Orca Drive

No shoulder on one side of the road.



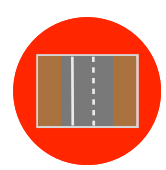
District 1

Waghorn Rd, from Pioneer Hill to Pioneer Way

No shoulder on one side of the road.







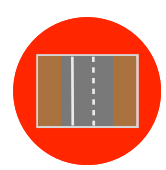
## Northlake Way

District 3

Northlake Way has wide paved shoulders on one side of the road, but the other side has shoulder widths that vary between one and three feet.







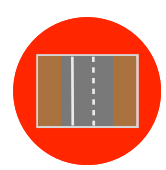
District 3

# Seabeck-Holly Rd

There is a two-foot shoulder on the east side of Seabeck-Holly Rd along the water. There is a wide paved shoulder on the opposite side.







District 3

# Knute-Anderson Road and Dickey Place

One side of the road  
has a paved shoulder,  
the other doesn't.



This area was recently  
redeveloped - and there is no  
bike facility here either.







District 1 Central Valley Road

There is a 4-foot shoulder on one side, but not the other.

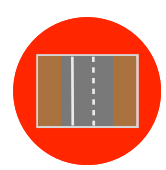


District 2 Stampede Blvd

There is a 4-foot shoulder on one side, but not the other.

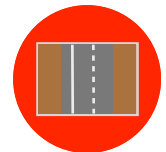






## Sylvan Way

From Olympus Drive to Perry, Sylvan has a wide 8-foot paved shoulder on the south side that accommodates parked cars. From Perry to Trenton, shoulders are less than four feet.



District 3

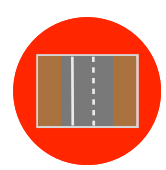
## Trenton Avenue



Trenton lacks consistent 4-foot shoulders. Cars sometimes park on the west side of the street.







District 2

## California Avenue

California has a four-foot shoulder on one side, but only a 1 to 2-foot shoulder on the other.



District 2

## Fircrest Drive

Fircrest Drive, south of Madrona loop, has a paved shoulder on only one side of the road, as is common in County residential neighborhoods without sidewalks.







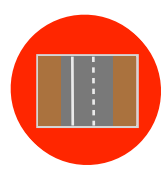
## Lincoln Avenue

District 2

Lincoln goes by East Port Orchard Elementary School, but has no marked paved shoulder on the non-school side of the road. The shoulder next to the school is either too narrow or accommodates parked cars.





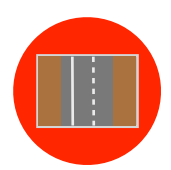


Fuson Road

Although there is a wide paved shoulder on one side of Fuson, there is no marked shoulder on the side with the sidewalk.







District 3

Prebble Street  
in Navy Yard City, a County  
island inside Bremerton.

Prebble st has a paved shoulder  
on one side of the street in this  
location only, but no marked  
shoulder on the other side. Cars  
sometimes park inside the  
marked shoulder, especially at  
the STEM Academy at the  
bottom of this hill.



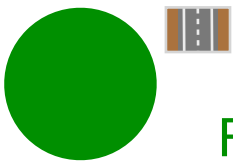
District 3

National Avenue  
in Navy Yard City, Bremerton

There is a sidewalk without a  
paved shoulder on one side of  
the street, and an ill-defined  
paved shoulder on the other  
side. Cars often park on the  
paved shoulder.







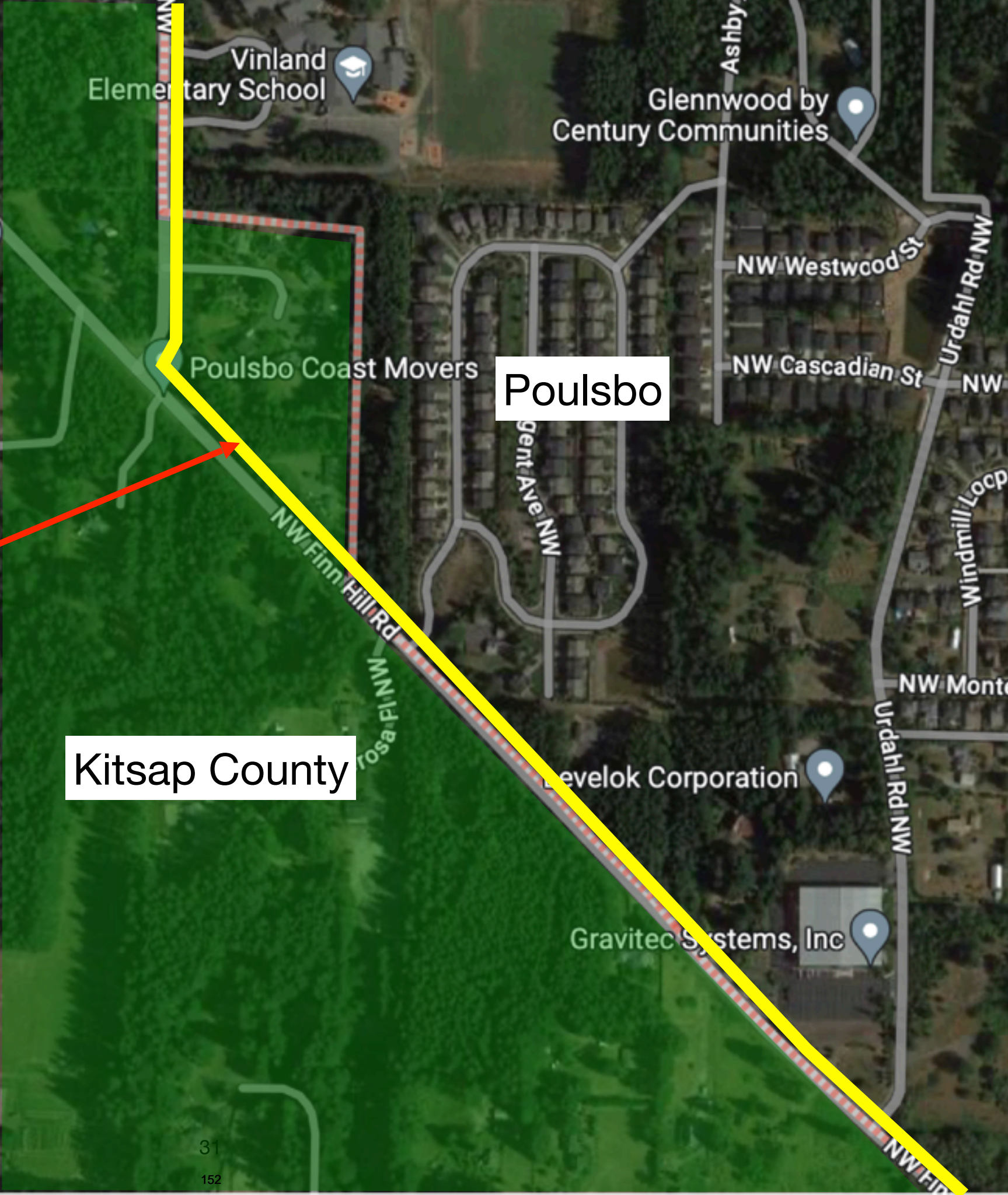
District 1

Facility not built or maintained  
by County - green

Finn Hill Rd Shared Use Path

The Finn Hill shared use path is a 0.7 mile long **City of Poulsbo facility** (yellow line). A short section of the path passes through Kitsap County's jurisdiction.

During the planning process, the County assisted by providing ROW acquisition services and some funds. The City of Poulsbo maintains the entire path.



Kitsap County

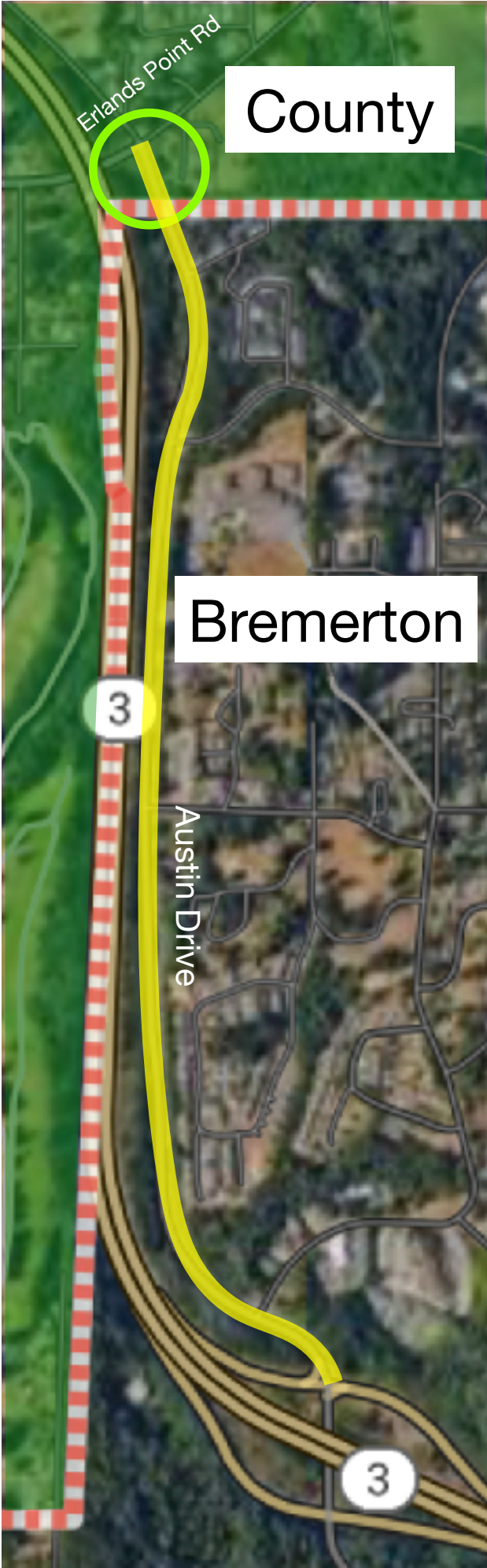
Poulsbo



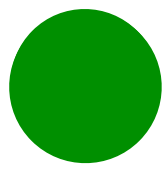
Austin Drive

The city of Bremerton built 1.1 miles of bike lanes on both sides of Austin Drive from SR 3 to Erlands Point Road (thick yellow line).

The last 0.1 mile, as the facility approaches Erlands Point Rd, is in the County. However, this is a **Bremerton** bike facility.







## Little Boston Road side path

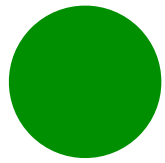
District 1

This 1.1 mile side path connects numerous Sklallam tribal residences and extends from Little Boston to The Point Casino.

The Sklallam Tribe paid for, built, and maintains this path.



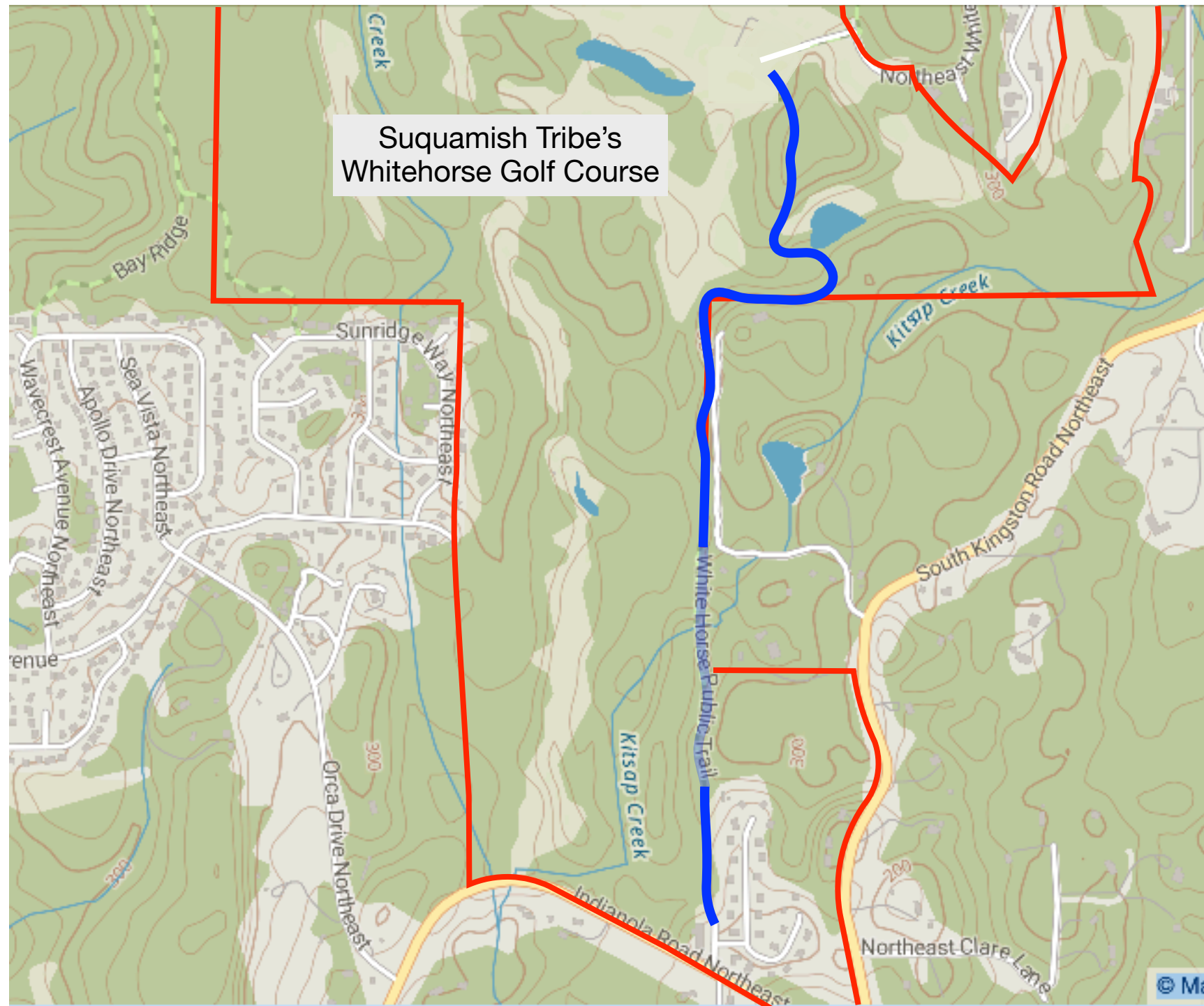


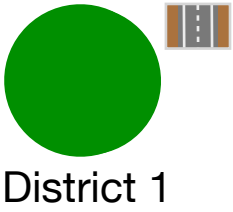


## Whitehorse Trail (blue line)

District 1

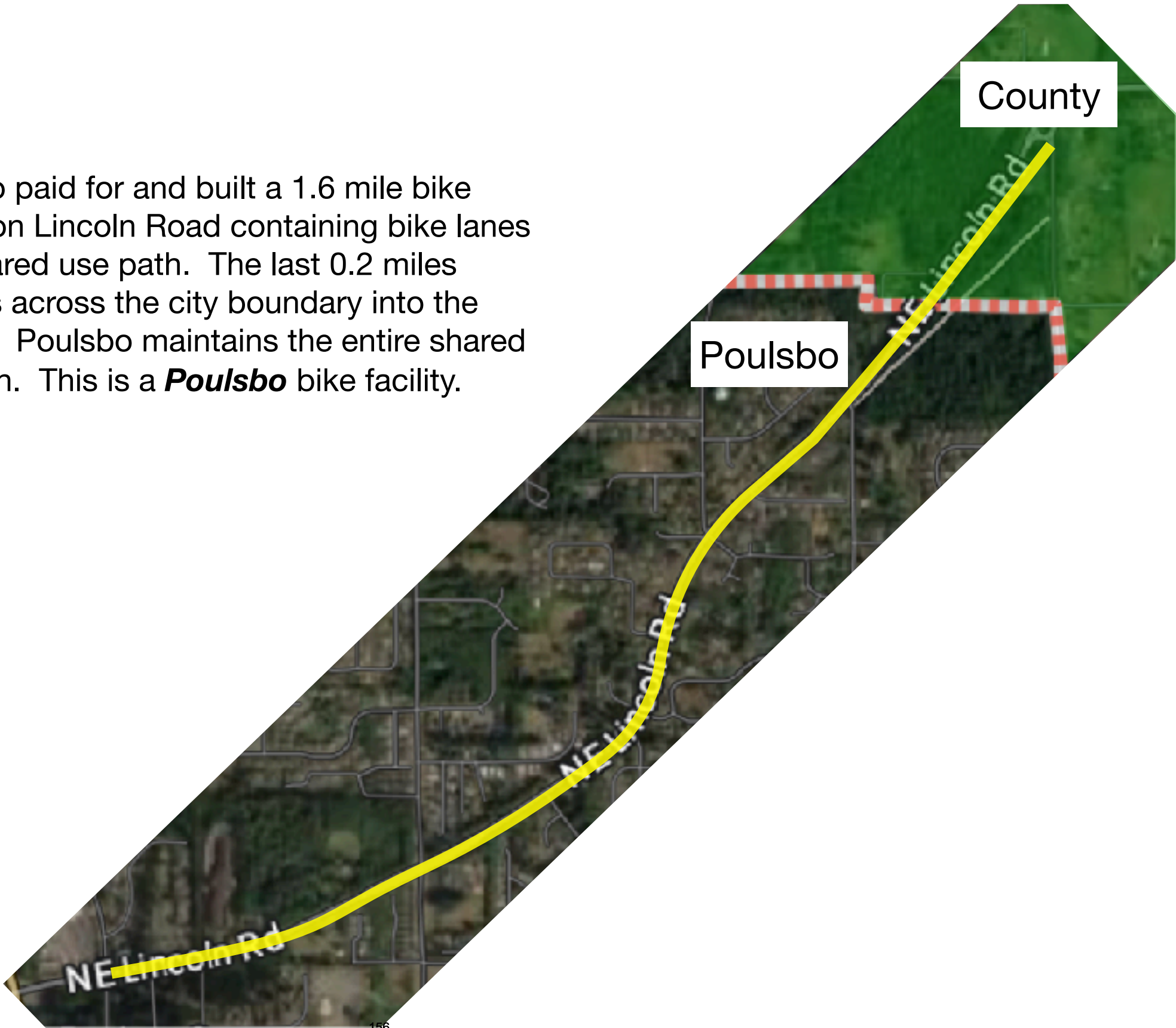
The White Horse Trail was built by the owners of the White Horse Golf Course on private property, now owned by the Suquamish Tribe. It is maintained by North Kitsap Heritage Park trails volunteers, and should not be considered a *County* “off-road non-motorized facility”.



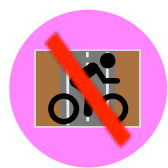


# Lincoln Rd. bike facilities

Poulsbo paid for and built a 1.6 mile bike facility on Lincoln Road containing bike lanes or a shared use path. The last 0.2 miles extends across the city boundary into the County. Poulsbo maintains the entire shared use path. This is a **Poulsbo** bike facility.





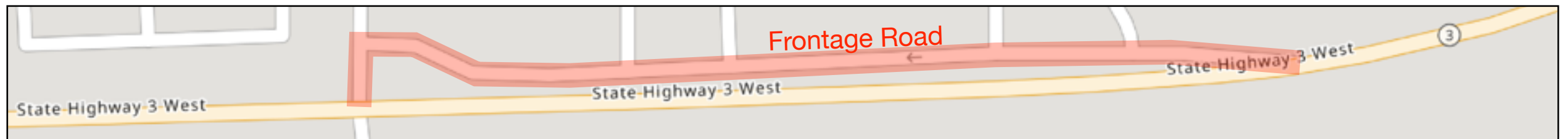


Not a bike facility, for other reasons - pink

District 2

Frontage road next to SR 3 in Gorst.

As near as I can tell, the “bike facility” shown on the County map is this short 0.2 mile frontage road on one side and parallel to SR 3. This is not a bike facility using the County’s definition, and at best provides only a brief respite from the hazards of SR 3.







## Newberry Hill Road between Prevost and Chico, crossing under SR 3

District 3

This section of Newberry is NOT bike friendly due to freeway on and off ramps and heavy traffic. There are wide shoulders, but no defined space for cyclists in busy traffic, a steep incline with curves, a bike unfriendly roundabout, and no intersection guidance. This is not a safe bike facility.



District 3

## May Street (Tracyton)

The paved shoulders here in the commercial center of Tracyton are ill-defined. There are no curbs or sidewalks. The road shoulders are used for business access or parking. There is no safe defined space for cyclists.







District 1

## Appletree Point Lane housing development in Kingston.

This is a 6-foot residential sidewalk. There is no on- or off-road multimodal facility.







District 3

## Green Mountain Elementary School near Lake Symington

There is about 80 feet of marked paved shoulder directly in front of the school. Road resurfacing in this neighborhood has erased all other pavement markings. Vehicles park on the sides of the road.



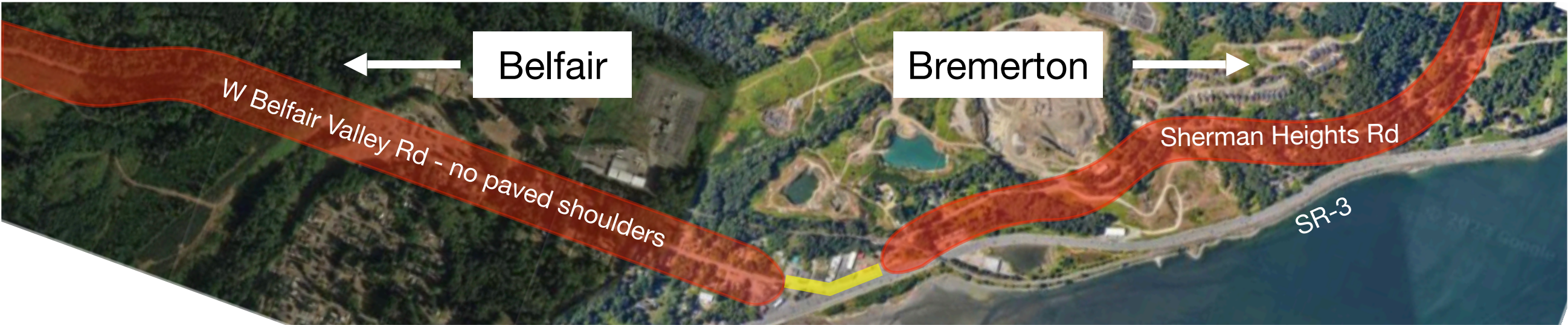




District 2

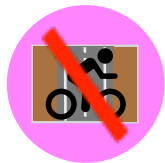
West Belfair Valley Road  
(where Sherman Heights Rd and the off ramp from SR 3 in Gorst join)

There are many reasons not to call this location a bike facility, and reasons not to use “four-foot paved shoulder” as a definition of a bike facility. The short 0.1 mile segment shown on the County map (in yellow below) is along the route from Bremerton to Belfair. There are no paved shoulders for several miles on either side of this road segment (red shading).



Continued on next page . . .





District 2

## West Belfair Valley Road continued . . .

This is a commercial-industrial area frequented by large trucks. The north shoulder of the road is used to access a variety of businesses - there is no defined space for bicyclists.

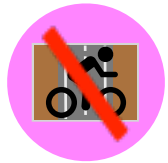
This is a freight route, and there is a highway off-ramp where Sherman Heights and W Belfair Valley road intersect, (see above and below) -----> Highway off-ramp



The term “bike facility”, suggests safety and continuity to a cyclist. It is disingenuous to use the term for a location that does not provide a safe way to get from one place to another.







District 1

## Rhododendron Lane north of Finn Hill Rd in Poulsbo

This road is listed as an “off-road” bike facility on the County map - apparently referring to the 5-foot asphalt sidewalk shown in the photo below. The road has a 4-foot paved shoulder on only one side.

This sidewalk connects to Vinland Elementary School, but is not the width of a shared-use path or side path, which is usually 10 to 14 feet to accommodate both pedestrians and cyclists.



Rhododendron Lane







District 2

Tremont Street in Port Orchard has bike lanes (light green line, at right). The “bike facility” identified by Kitsap County on Old Clifton Rd (the white line) contains heavily traveled freeway on and off ramps. There are paved shoulders adjacent to this highway intersection to accommodate heavy traffic, but no “facilities” are present, except in Port Orchard on the *east side* of SR 16.



In the photo above, a bike on the shoulder riding to Port Orchard will be cut off by high speed traffic exiting SR 16.







District 3

# Dickey Road adjacent to Newberry Hill road

Dickey Rd, just north of Newberry Hill Rd, has no paved shoulders.

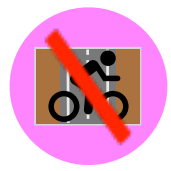


gravel



gravel





## Sirocco Circle in the “Eastwind” residential community.

District 3

Sirocco Circle has a defined wide paved shoulder in a continuous loop on one side of the road. Residents often park in the paved shoulder, and this loop does not connect to another bike facility.







District 3

# Silverdale Waterfront Park Clear Creek Trail

This is a park with a playground,  
designed for walking, not biking.

This is not a bike facility.



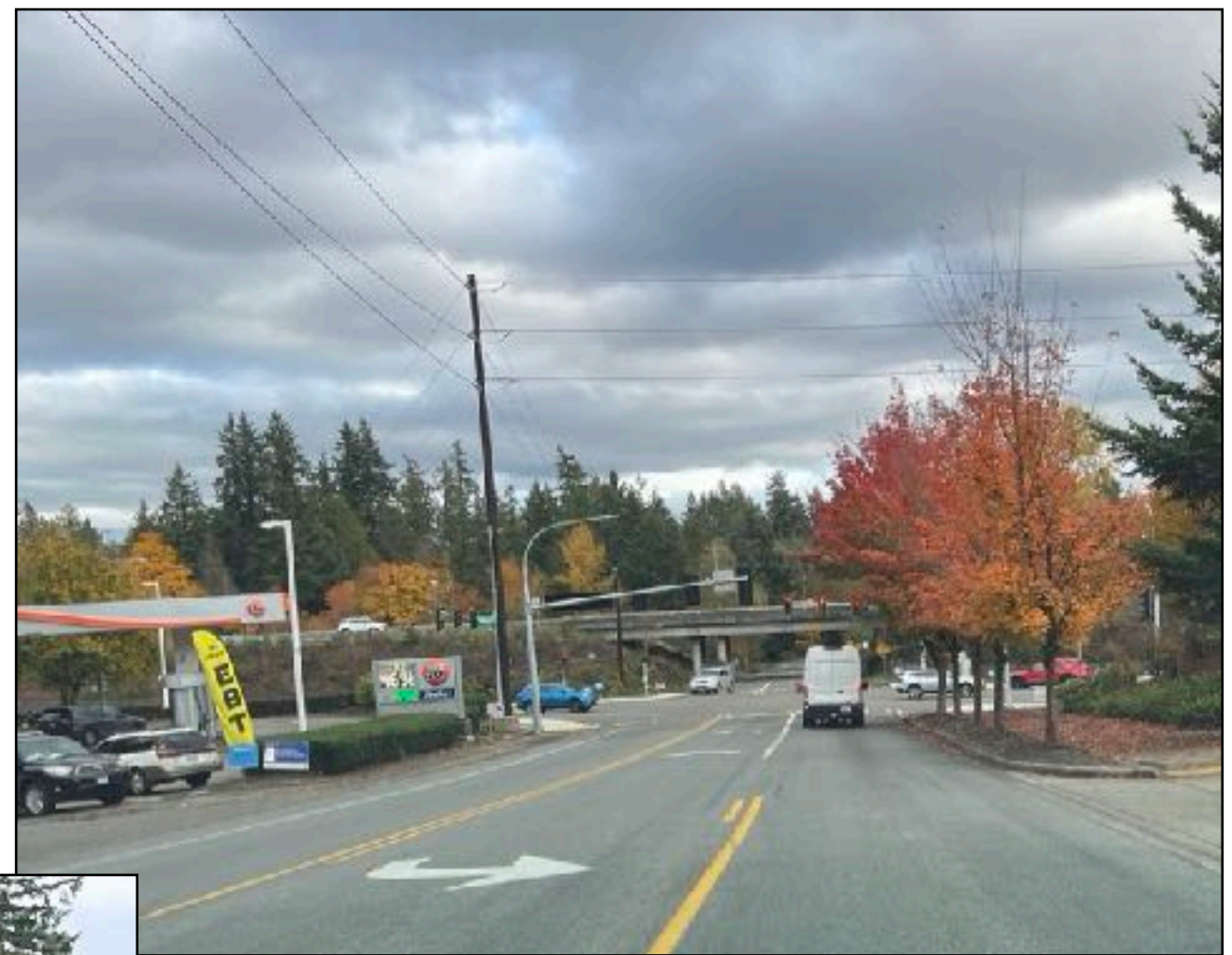




District 3

## Anderson Hill Rd Provost Road to roundabout

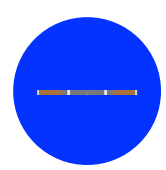
There is no intersection  
guidance across Provost for  
bikes (right image) . . .



. . . and no alternative for bike  
users other than going through the  
roundabout shown on the left.

Not a bike facility.





# Fairgrounds Road

District 3

East of SR 303 there is new construction on Fairgrounds Rd associated with a new sidewalk and painted 4-foot shoulder on one side of the road. The paved shoulders end abruptly on either side of the construction area. The other side of the road lacks paved shoulders.



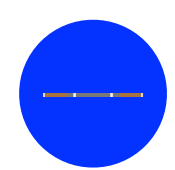
South side of road



New construction north side of road







# Little Anderson Creek Bridge

District 3

There are no paved shoulders on Anderson Hill Road west of the bridge

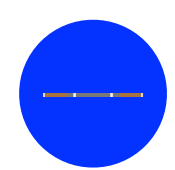


There are wide paved shoulders across Little Anderson Creek bridge and for a short distance on either side. The rest of the road, to Silverdale and to Seabeck, has no paved shoulders. Focal improvements like this do not make this bridge a bike facility.



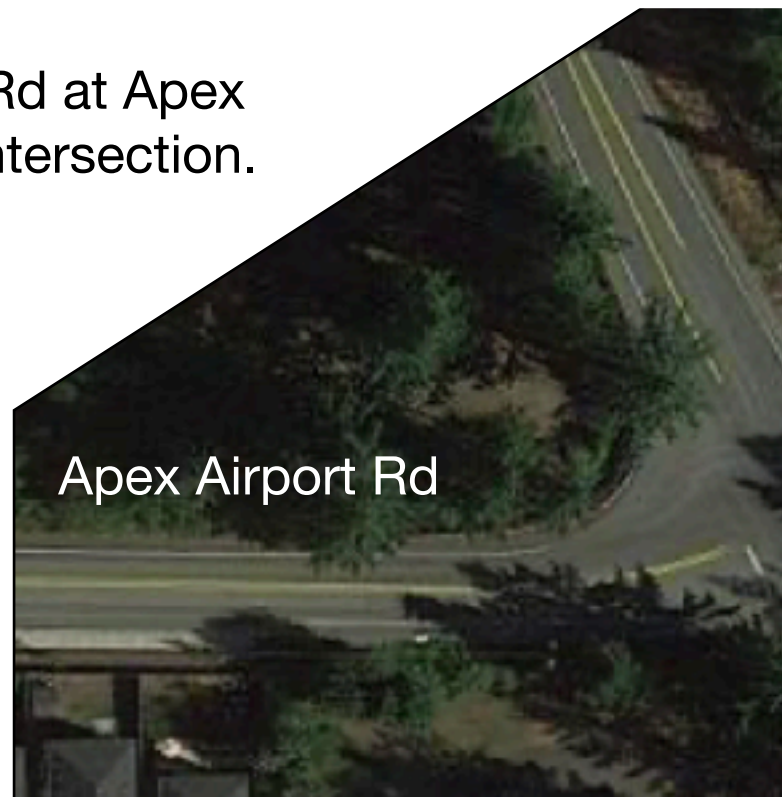
There are no paved shoulders east of the bridge





District 3

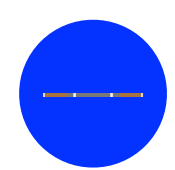
## Anderson Hill Rd at Apex Airport Road intersection.



Anderson Hill Rd has wide paved shoulders in the focal location (at right) where the county widened the road to create left turn pocket. On either side of this intersection, Anderson Hill Rd has no shoulders at all, see below. A short segment of 4-foot shoulders on a road otherwise devoid of them does not make this a bike facility.

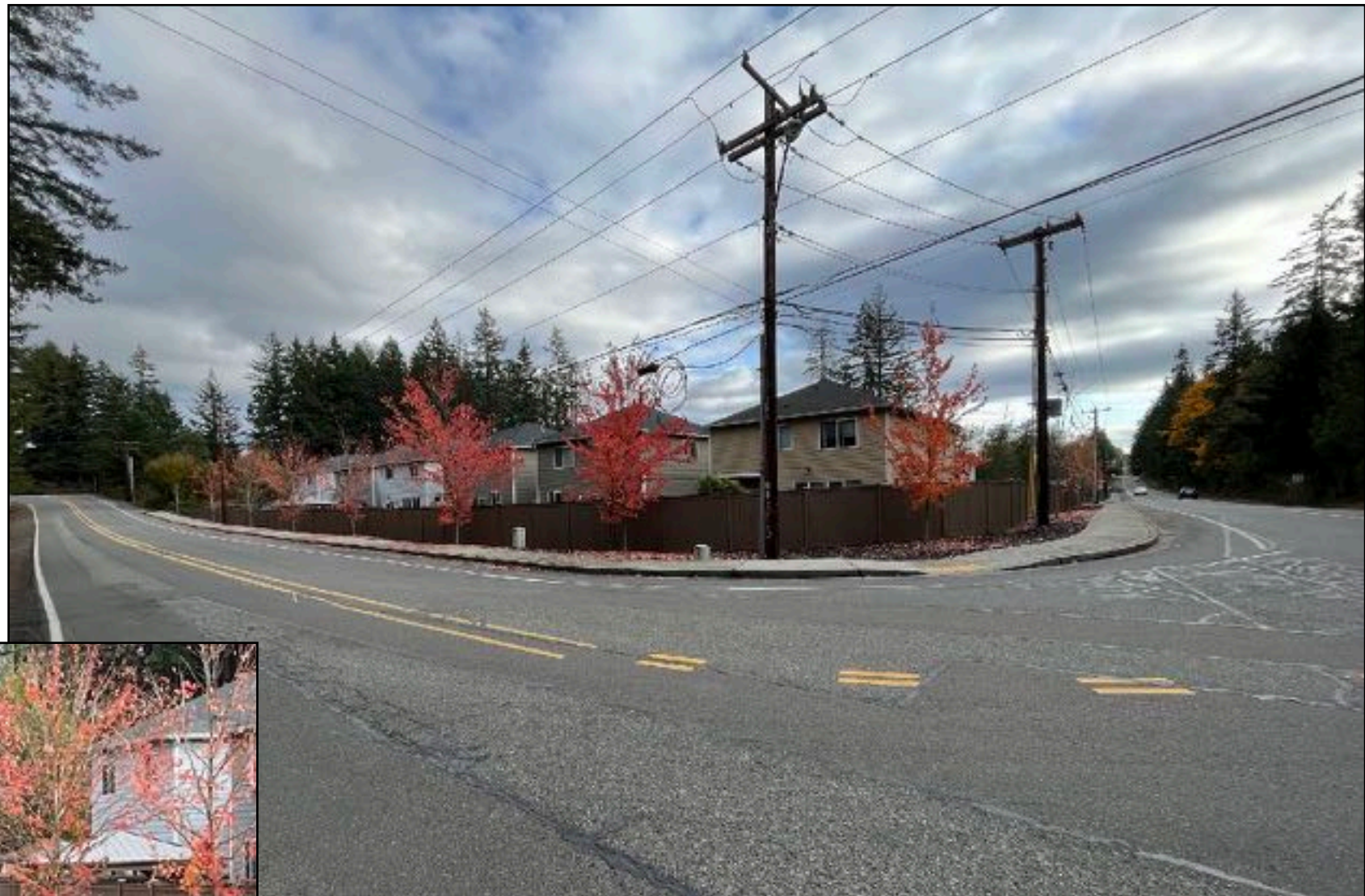






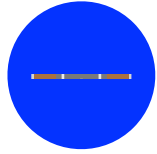
## District 3

This is a small one block development at Apex Airport Road and Dickey Rd.



In this location only, on one side of the road, there is a sidewalk and a paved shoulder. On the opposite side of the street there is no shoulder on either street. This is not a bike facility.





The following County road projects are small in scope and added paved shoulders during construction. However, there is no bike facility on either side of these small “opportunity” projects. The short length of paved shoulders created in this way do not make them bike facilities.

- Stottlemeyer, 0.1 shoulders revision at intersection with Bond Rd
- Lincoln, 0.1 shoulders revision of intersection at Stottlemeyer
- Lincoln, 0.1 shoulders revision of intersection at Widme Rd.
- Sherman Hill overpass above SR 3 0.1 mile shoulders over bridge
- Mountain View overpass 0.1 mile shoulders above SR 3
- Sidney Rd 0.1 mi road widening to create turn pocket - shoulders added.

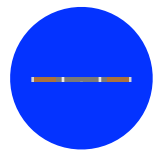


Stottlemeyer has paved shoulders in the 0.1 mile location shown, but nowhere else along the road.

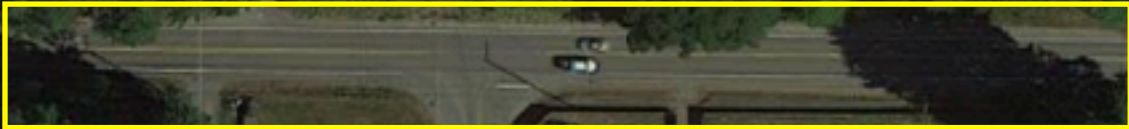








Lincoln Rd has 0.1 mile paved shoulders adjacent to the intersection with Widme Rd.



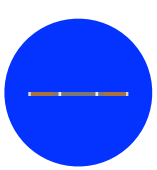
Lincoln Road

Widme Rd

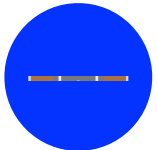
In this photo, you can see where paved shoulders were added.



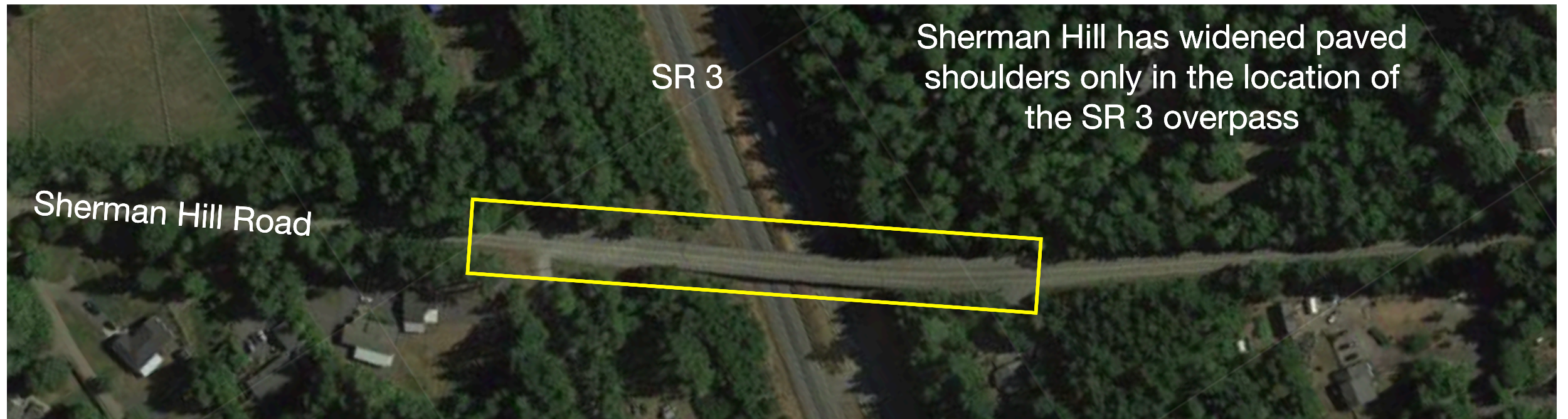




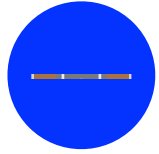
District 1



District 1





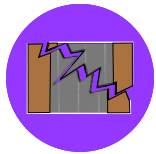


## District 2

Sidney Rd was apparently widened to provide a left turn pocket into Shannon Drive, the entrance to a residential neighborhood. Widening the road required building the brick retaining wall, shown below. Paved shoulders exist only for the length of the project. Wide paved shoulders for such a short distance do not make this a bike facility.



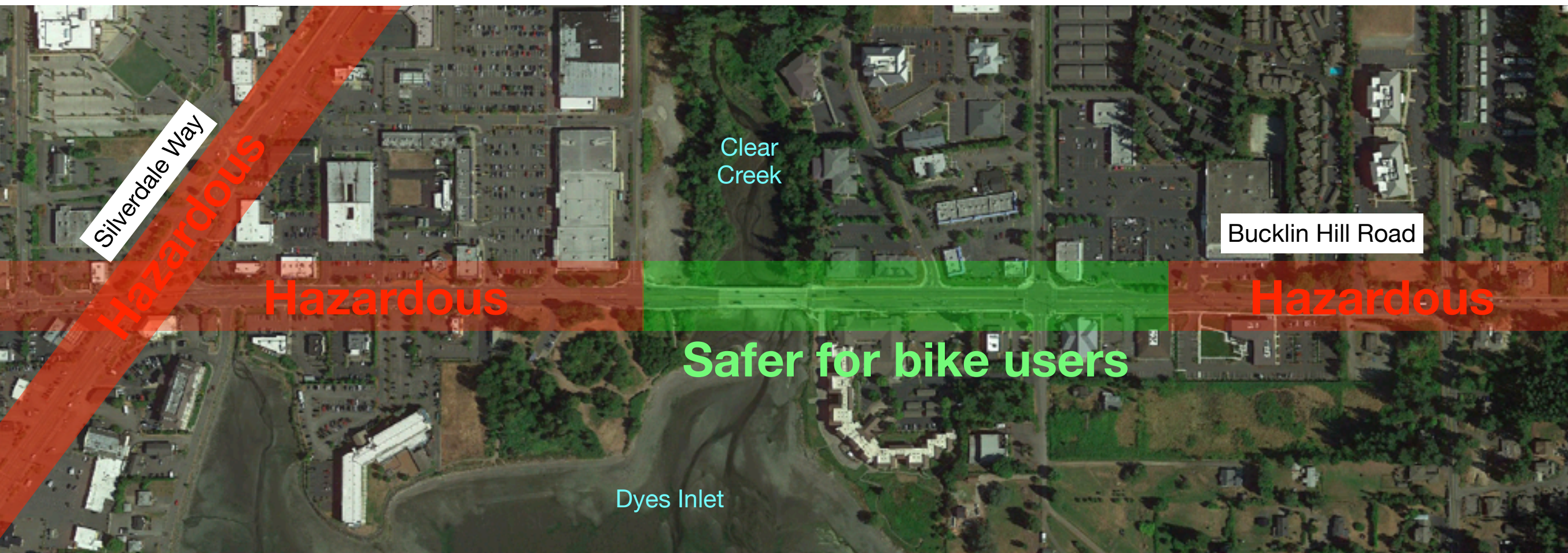




District 3

## Bucklin Hill Road (signed County bike route #44)

Bike lanes were built on Silverdale's Bucklin Hill Road in 2016 as part of a bridge project to preserve salmon. There is little benefit to this investment in bike facilities if they don't connect to other communities or other places in Silverdale.



Arterials adjacent to Silverdale like Chico Way, Viking Way and Tracyton Boulevard have marginally useful shoulders for bike users, however there is no designated or protected space for a bike user wanting to travel east-west, or north-south *through* Silverdale.



Bucklin Hill's eastbound bike lane ends abruptly at the end of the bridge project where two car lanes merge into one, forcing cars and cyclists to abruptly merge together, and giving cyclists only one foot of paved shoulder to separate them from cars.



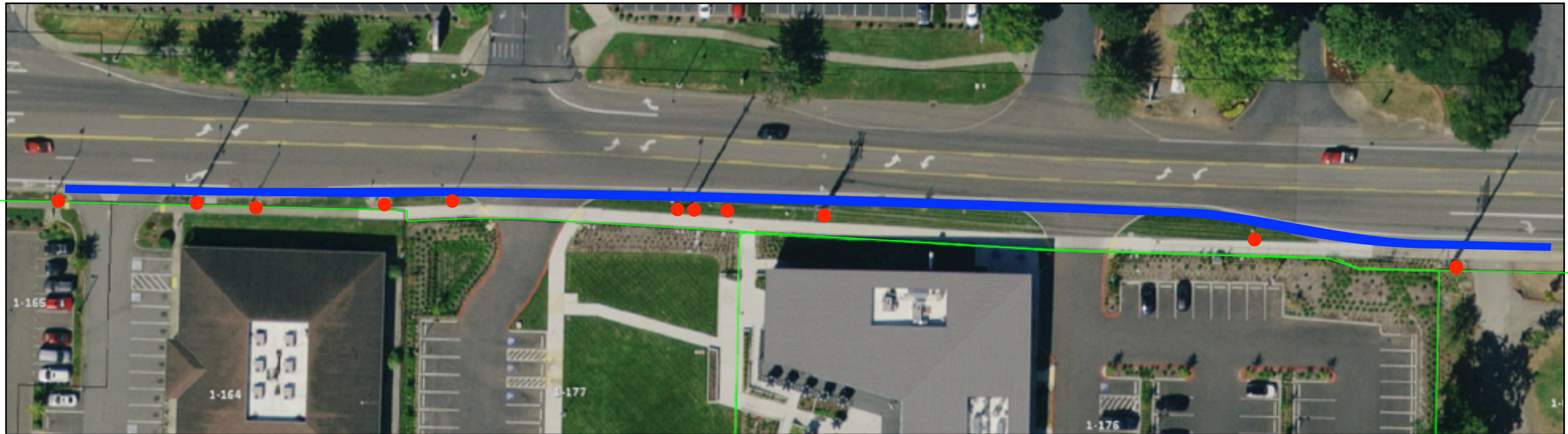


The County owned right of way that could easily have extended the bike lane to Tracyton Blvd. This right of way was revised when building construction occurred in this location in 2019, but light and utility poles were left where they were. A bike lane could have been placed on the road by widening it slightly, or routed to one side or the other of the utility poles - made easier if the poles had been moved during construction. However, it does not appear that continuing the new bike facility to Tracyton Blvd was even considered.





Widening the paved road slightly could have provided room for a bike lane, shown below as a dark blue line . . .



. . . or, moving utility poles (red circles) a few feet could have created space for a bike lane next to the new sidewalk.

It does not appear the County placed any value on bike facility connectivity - which is the main policy emphasis of County non-motorized plans since 2001.

The only bike lanes among all 20 County numbered bike routes are these 0.3 miles on Bucklin Hill Rd, and they don't connect anywhere.





# Unincorporated Kitsap County Bicycle Facilities

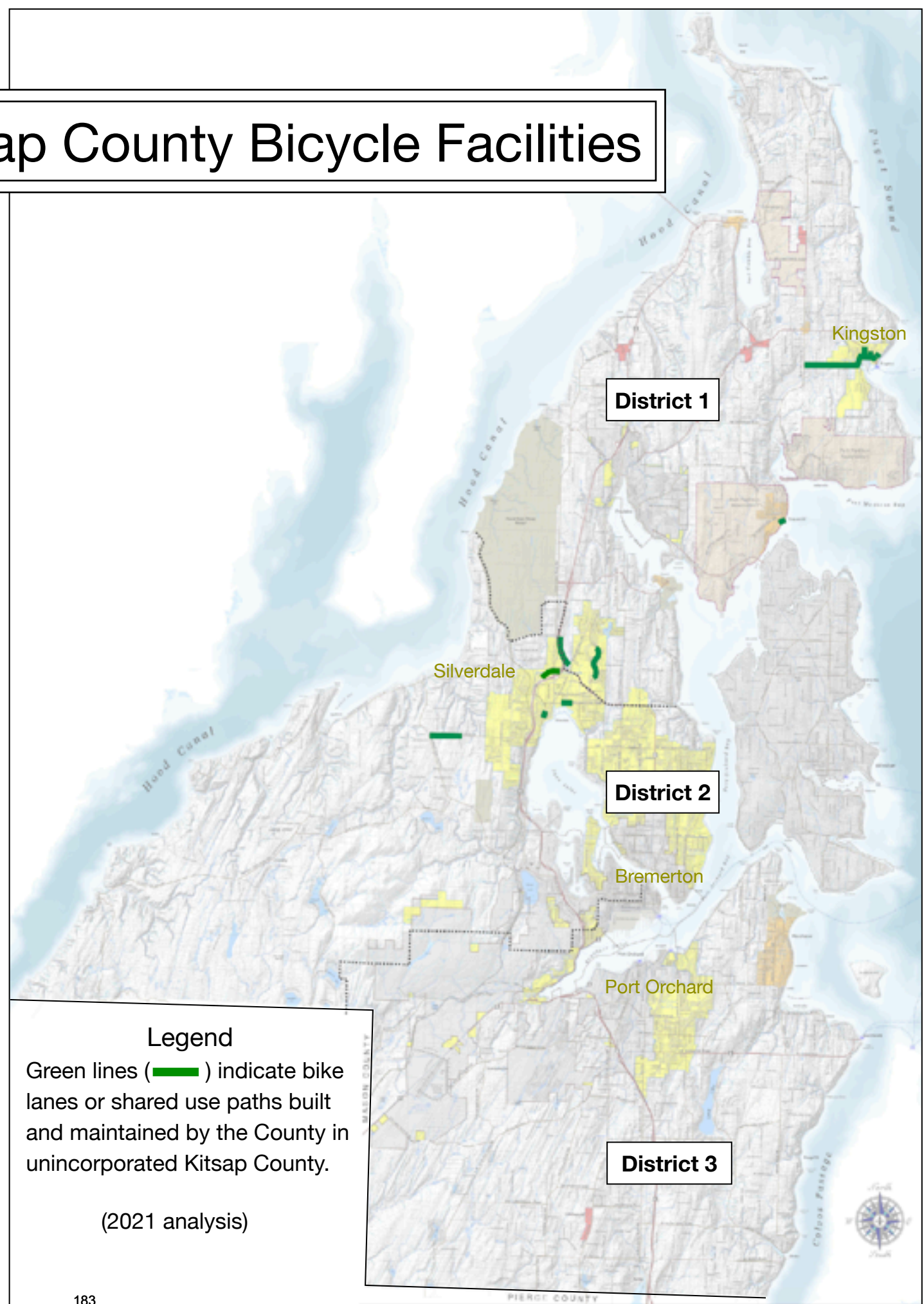
2001 Bike Facilities Plan prioritized >300 mi of shared use paths & bike lanes.

2013 & 2018 Non-Motorized Facilities Plans: 180 miles of “bike routes”.

# <2%

**are WSDOT-defined bike facilities,** which include shared use paths and bike lanes.

There are no facilities linking population centers through unincorporated Kitsap County: Gig Harbor-Port Orchard-Bremerton-Silverdale-Poulsbo-Kingston.



## **Kitsap County Non-motorized Facilities plan.**

*Now that we are no longer a rural county, how do we make our streets safer with an updated Non-motorized plan?*

### **1. Bike facility definitions**

- WSDOT
- Kitsap County's existing definitions

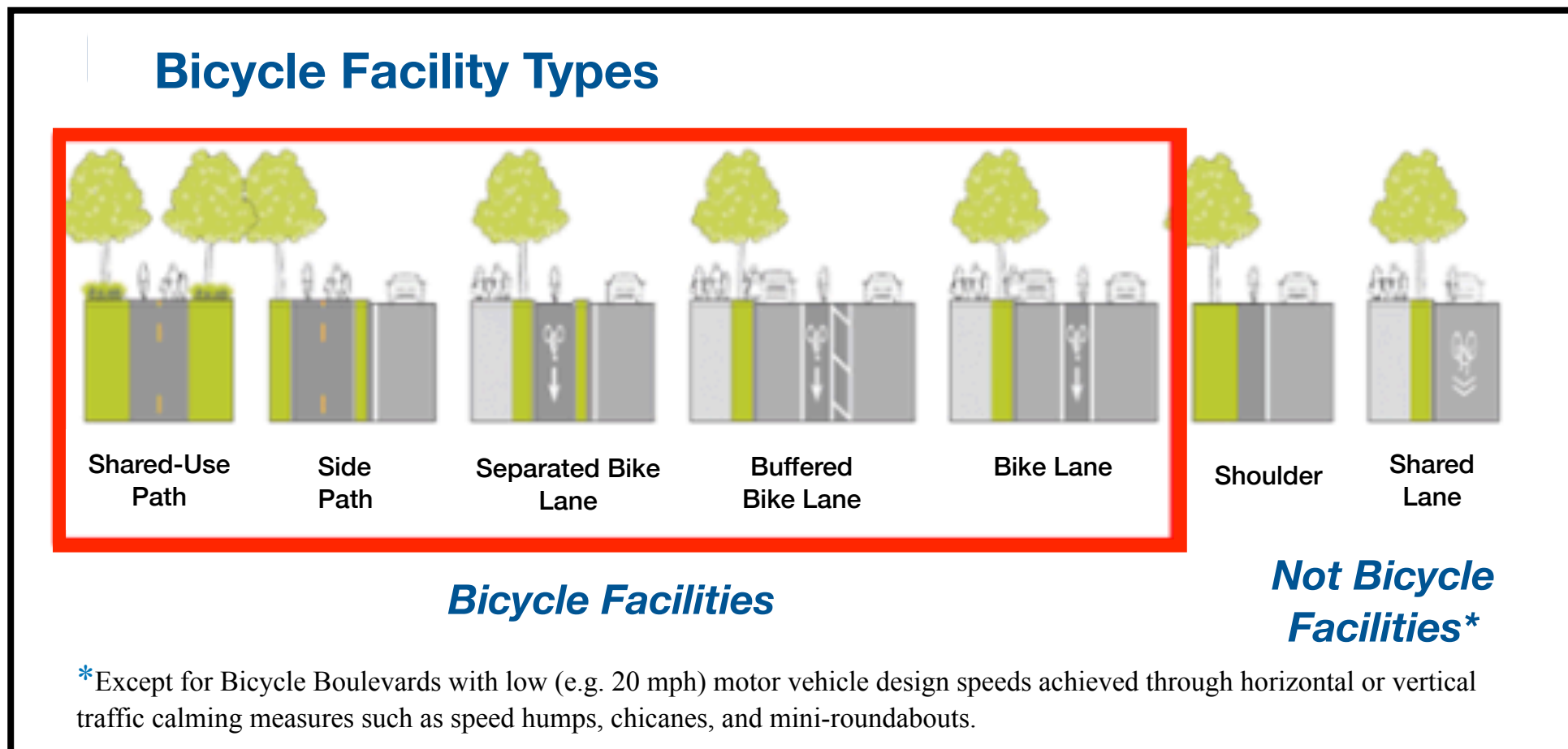
### **2. TIPS Process**

- Kitsap County TIPS process explained
- Specific Road Projects on TIPS list

### **3. Suggested modifications to Non-motorized plan and TIP's to better implement policy goals**

# Levels of Safety for Bikes

The graphic below is from the National Highway Institute Course on Bicycle Facility Design, and clarifies what is and isn't a bike facility according to USDOT and WSDOT. Bike Facility types are shown, left to right, from safest to least protected.



The term “Bicycle Facility”, as defined above, is immensely useful to cyclists in choosing safe routes. Any bicycle facility will have a consistent, signed, designated space for the preferential or exclusive use of bicyclists. No such guarantee exists riding on a paved road shoulder, which can begin, end or narrow suddenly without warning, or be on only one side of a road.

Bicycle planning and data collection should be relevant to **bicyclists**, who are concerned with consistency, connectivity, and safety. Bike maps should convey information desired by bicyclists, information that helps them navigate safely where they are to where they want to go.



All Kitsap County Non-Motorized Plans contain admirable goals and policy visions. However, implementation is adversely affected by altering the usual and conventional meaning of bike specific terms. NMP definitions are shown in red, below. My comments are shown in blue. These definitions are so vague that it hinders the ability of elected officials to set measurable goals or monitor progress toward achieving them.

**Bicycle Facilities** – A general term denoting improvements and provisions to accommodate or encourage bicycling, including parking and storage facilities, and shared roadways not specifically defined for bicycle use.

*Any road that a bicycle can ride on is considered a “bike facility” by this definition, even if unsafe for users.*

**Bikeway** – A generic term for any road, street, path or way which in some manner is specifically designated for bicycle travel, regardless of whether such facilities are designated for the exclusive use of bicycles or are to be shared with other transportation modes.

*Any road can be considered a “Bikeway” by this definition, and be “designated for bicycle travel”, even if unsafe for bike users.*

**Bicycle Route or Bike Route** – A roadway or bikeway designated by the jurisdiction having authority, either with a unique route designation or with Bike Route signs, along which bicycle guide signs may provide directional and distance information.

*The jurisdiction having authority (Kitsap County) can designate any road a bike route by this definition, even if unsafe for users.*

**Deficient Roadway or Segment** – A roadway or portion thereof that is currently constructed with insufficient road shoulders or other facilities for non-motorized transportation that may create safety issues.

*Any roadway that doesn’t have 4-foot paved shoulders can be designated a deficient roadway or segment, even when it is not part of a bike network or bike route in County plans.*

Non-standard definitions can be confusing and mislead readers.

## Where does Kitsap County's idea that a road shoulder is a bike facility come from?

I don't know, but definitions provided by the Puget Sound Regional Council (PSRC) probably contribute to this misunderstanding. PSRC\* carefully defines "bicycle facility" to "[help inform and encourage consistency in local pedestrian and bicycle planning and data collection efforts](#)". Bike lanes, buffered bike lanes, and protected bike lanes are "[designated by striping, signage, and pavement markings for the preferential or exclusive use of bicyclists](#)." Neighborhood Greenways are listed as a type of bike facility where cars and bikes travel at comparably slow speeds, "[designated to give bicycles travel priority](#)." All these definitions are in accord with WSDOT and USDOT definitions of bike facilities.

PSRC then describes a new category, "**shared use**" facility. Within this category are paved "Shared Use Paths", the safest type of bike facility, completely separated from motor vehicles and designated to accommodate all modes of active transportation.

A paved road shoulder is listed as another shared use facility, except instead of vulnerable users sharing the same space, paved shoulders accommodate vulnerable road users and **cars**, a much more hazardous situation. Shoulders are not a bike facility according to PSRC: "[Shoulders are not an exclusive active facility type, and may be used by parked vehicles](#)." "[They should be at least 4 ft wide - additional shoulder width is desirable on roadways with high motor vehicle speeds \(over 50 mph\); high numbers of large vehicles; or if static obstructions exist](#)." PSRC states paved shoulders are useful on busier or higher speed rural roads where cars are traveling much faster than bicycles.

It is interesting, and confusing, that Neighborhood Greenways are not also listed as a "shared use" facility, even though bicycles and cars share the same lanes.

That PSRC mentions "paved shoulders" in a description of "Pedestrian and Bicycle Facility Typology", opens the door for confusion, and the misrepresentation of paved shoulders as designated bike or non-motorized facilities - which they are not, even according to PSRC.

Kitsap County would do well to adopt WSDOT's definition of bike facilities, which are of a higher safety standard and much less confusing.

\*All quotes in blue, above, are from the PSRC document: "PSRC Pedestrian and Bicycle Facility Typology".

The County's 2013/2018 NMP makes this statement on page 4: "In Kitsap County, there are over 145 miles of on-road non-motorized facilities (paved shoulders)". On page 29 of the NMP is a section titled "Existing Non-motorized facilities". The text reads: "Included within this inventory are existing state, county, municipal and private facilities". Kitsap's eleven state highways are listed as "state facilities", because "bicycle travel is allowed in the shoulder of all state routes in Kitsap County."

However not all highways have consistent 4-foot or wider shoulders, so the NMP acknowledges that there are many deficient segments "that may create safety issues for pedestrians, bicyclists or other users." This is especially true considering vehicular speeds and volumes on state highways.

The total length of state highways within the county exceeds 90 miles, which means 90 of the County's "145 miles of on-road non-motorized facilities" is probably highway. And, much of the remainder are facilities planned, built and maintained by incorporated municipalities and other jurisdictions.

The inclusion of state highways as an on-road non-motorized facility accounts for Public Work's claim\* that the Mosquito Fleet Trail through Gorst around Sinclair Inlet on highways SR-16 and SR-3 is "complete" - *even though* the Mosquito Fleet Trail Plan and the 2001 Bike Facilities Plan call for a separated shared use path through this incredibly busy highway interchange. Flawed logic like this pervades County non-motorized planning because of non-standard definitions of key words.

It doesn't help cyclists when any widening of a road, anywhere, for any reason is considered to be an incremental addition to non-motorized facilities, especially when such improvements are not on a defined County bike route. In 2023, only one 0.3 mile designated bike facility exists among the 20 numbered bike routes in the 2013 NMP, totaling 172 miles. That federal project created a bridge over Clear Creek in Silverdale on Bike Route #44. The bike lanes terminate abruptly at the ends of the project and no other bike facility connects to them, providing no additional connectivity.

To better understand how this comes about, let's examine the process whereby County Public Works selects which capital projects to fund and build, the County's Transportation Improvement Program.

\*Kitsap Regional Coordinating Council's "Looking for Linkage" document, 2010)



## Kitsap County's Transportation Improvement Program (TIP)

Every December the Kitsap County Commissioners sign a resolution adopting the next **“Six-Year TIP for Kitsap County Roads”**. Doing so signifies agreement with the choices and direction taken by their Public Works staff.

County Policy for non-motorized projects derive from the 2001 Bicycle Facilities Plan and the 2013 Non-Motorized Plan. Both call for an extensive network of bicycle facilities that connect Kitsap communities. The 2001 plan defines these facilities as either bike lanes or shared use paths.

How well has the Transportation Improvement Program been in implementing County Policy? An examination of all 345 project miles in the 2001 Bike Facilities Plan reveals that less than 1% now have the bike facilities described in the plan, and the vast majority of those do not connect to one another. The 2010 Kitsap Regional Coordinating Council document, “Looking for Linkage”, acknowledges that failure and attributes it to Public Work’s Transportation Improvement Program:

“In 2001, Kitsap County Public Works Department (DPW) published its Bicycle Facilities Plan with a project prioritizing system ~ the Priority Array defined **High, Medium, Low and Opportunity Projects**, but it proved difficult in implementation. Quite simply, the High Priority Projects were not being implemented; more Low and Opportunity projects were being constructed as the Department of Public Works programmed various construction and re-construction projects through the Transportation Improvement Program.” (Looking for Linkage, pg 100)

The bike network connecting Kitsap County communities envisioned in its various Non-motorized plans does not exist. There can be no expectation that this will change unless the TIP process changes.

## **Project selection and prioritization for inclusion in the Kitsap County Six-Year TIP**

Most projects nominated for the TIP are selected by staff. All non-motorized improvements *suggested by the public* are evaluated and ranked by the Non-motorized Facilities Citizens Advisory Committee (CAC). Projects for road preservation, culvert replacement, environmental protection, bike facilities, and bridge proposals all are prioritized using the *same* scoring criteria. The 50 or 60 projects with the highest scores are included in the Six-Year TIP and prioritized based on the number of points projects are awarded.

The scoring criteria is shown on the following page only to make the point that these criteria are heavily oriented toward roadway / motor vehicle improvement projects. Any new bike facility would profoundly increase safety for cyclists, but it is unclear how criteria for roadway safety and crash reduction would apply to a non-motor vehicle project. The scoring criteria shown on the next page is from 2015.

## Kitsap County Public Works Transportation Project Evaluation System (2015)

### Primary categories:

1. 0-25 Points - Road Preservation. Extend the useful life of bridge and roadway infrastructure.
2. 0-25 Points - Bridge and Culvert Preservation - Includes culvert replacement to remove fish barriers.
3. 0- 8 Points - Environmental Retrofit. Remove fish barriers.
4. 0-18 Points - Safety. Roadway safety program. Crash reduction. Unclear how these points apply to bike safety.
5. 0-18 Points - Capacity. Projects designed to increase automobile throughput.
6. 0- 6 Points - Non-Motorized.

### Secondary categories:

7-9 0-12 Points - Vertical, Horizontal, and Width of roadway. These relate to deviations from road standards

10.0- 5 Points - Non-Motorized.

- (5) points Projects within 1 mile of a library, transit stop or gov't bldg - OR completes a segment of a non-motorized network.
- (3) points Project includes non-motorized facilities such as a shared use path, sidewalk, bike lane or separated path.
- (1) point awarded if a road shoulder is widened to accommodate bicycles.

11.0-4 Points - Transit.

12.0-5 Points - Consistency with Comp Plan. 5 points if *specifically* identified in the Comp Plan

13.0-3 Points - Sensitive Area Impact. *Improves* environmentally sensitive areas.

14.0-3 Points - Inter-jurisdictional. Multiple jurisdictions participate in planning, funding, or implementation.

15.0-5 Points - Significance. Relates to vehicular throughput: project is on an arterial, connector, or residential street.

16.0-20 Points - Secured Funding. More points if project has a greater % of secured *grant funding*. Grant applications are not submitted for every project in the TIP; staff make that decision.

17.0-10 Points - Potential Safety Issue. Can only add points here if none were given to "Safety" in primary category.

(5) points if an inherently hazardous condition. (10) points if problem is "documented"

18.0-5 Points - Maintenance Reduction. Reduces ongoing maintenance requirements.

19.0-5 Points - Economic Development. Generates higher skill/wage jobs or improves access to existing commercial land use.

20.0-5 Points - Freight Mobility. Improves roadway design for freight.



The Six-Year TIP Resolution, signed yearly by County Commissioners, states the awarding of points is **highly subjective**. Every Six-Year TIP Resolution through 2017 has this admonition:

“As may be expected, the assignment of priority numbers is a complex process involving a great deal of judgement and subjectivity on the part of the people preparing the program”. . . **“It is also very important that the Public has input into this process. As stated before, the prioritization process is a highly subjective one and we need Public input in order to balance the judgements that we make.”** 2016 Six-Year TIP Resolution document

All Six-Year TIP resolutions from 2010 through the present were reviewed in preparation for this document. Signed Six-Year TIP resolutions after 2017 do not include the second sentence printed in bold above. At present, the public is given no opportunity to share their input regarding staff’s prioritization of projects. The CAC’s role in this regard is minuscule.

You’ll need to understand the format for describing each TIP project to understand what happens to projects over time, The key to abbreviations is included in every Six-Year TIP resolution. The project below would add paved shoulders to Miller Bay Road from Gunderson Road to Geneva Street, a length of 2.76 miles. It has a low priority, #61 out of 63 projects listed for that year, meaning it is unlikely to move forward in the coming year.

Agency: Kitsap County  
County No. 18

SIX YEAR  
TRANSPORTATION IMPROVEMENT PROGRAM  
2016 TO 2021

FUNG. CLASS	PRIORITY NO.	PROJECT IDENTIFICATION A. Federal Aid No. B. Road Log Number - Bridge Number C. Project / Road Name D. Beginning and End E. Description of Work	IMPROVEMENT TYPE(S)	FUND. STATUS	TOTAL LENGTH (mi.)	UTILITY CODES	PROJECT COSTS IN THOUSANDS OF DOLLARS										EXPENDITURE SCHEDULE (LOCAL AGENCY)						
							PROJECT PHASE	MONTH / YEAR PHASE STARTS	FUNDING SOURCE INFORMATION							TOTAL							
									FEDERAL FUNDS		RAP / CAPP / TIA / UATA / PWTF / OTHER	STATE OR OTHER FUNDS	IMPACT FEES	LOCAL FUNDS									
									FEDERAL FUND CODE	FEDERAL COST BY PHASE													
16 07	61	Miller Bay Road / Augusta Avenue Gunderson Road to Geneva Street Pave shoulders	06	S	2.76	C,G,P, T,W	P.E. R/W Const. Total								1,000 200 3,145 4,345	1,000 200 3,145 4,345					100 100 3,145 3,395	750 100 3,145 850	150 100 3,145 3,395

FUNG. CLASS	PRIORITY NO.	PROJECT IDENTIFICATION  Project / Road Name Beginning and End Description of Work	IMPROVEMENT TYPE(S)	FUND. STATUS	TOTAL LENGTH (mi.)	UTILITY CODES	PROJECT COSTS IN THOUSANDS OF DOLLARS								EXPENDITURE SCHEDULE (LOCAL AGENCY)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																						
							PROJECT PHASE	MONTH / YEAR PHASE STARTS	FUNDING SOURCE INFORMATION						YEAR 1 2016	YEAR 2 2017	YEAR 3 2018	YEAR 4 2019	YEAR 5 2020	YEAR 6 2021																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																	
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16 07	61	70370 / 70320  Miller Bay Road / Augusta Avenue Gunderson Road to Geneva Street Pave shoulders	06	S	2.76	C,G,P, T,W	P.E. R/W Const Total																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																														</

Each project has three phases: Preliminary Engineering (P.E.), Right of Way acquisition (R/W), and Construction (Const). The source of funds for each phase must be identified. If the project has grant funding, it is much more likely to move forward. Here, the boxes for grant funds are empty, so no grant funding is available or none was applied for. Only “local” funds, paid by the County, are listed as being available: \$1 M for preliminary engineering, \$200,000 for R/W acquisition, and \$3.145 M for construction. The “KEY TO INFORMATION” section of the TIP states that projects with grant funding will usually be given higher priority over projects with only local funding.

Preliminary engineering for this 2016 project is scheduled to begin in year 4 (2019), R/W acquisition in year 5, and construction in year 6, IF the project is not deleted from subsequent Six-Year TIP Resolutions.

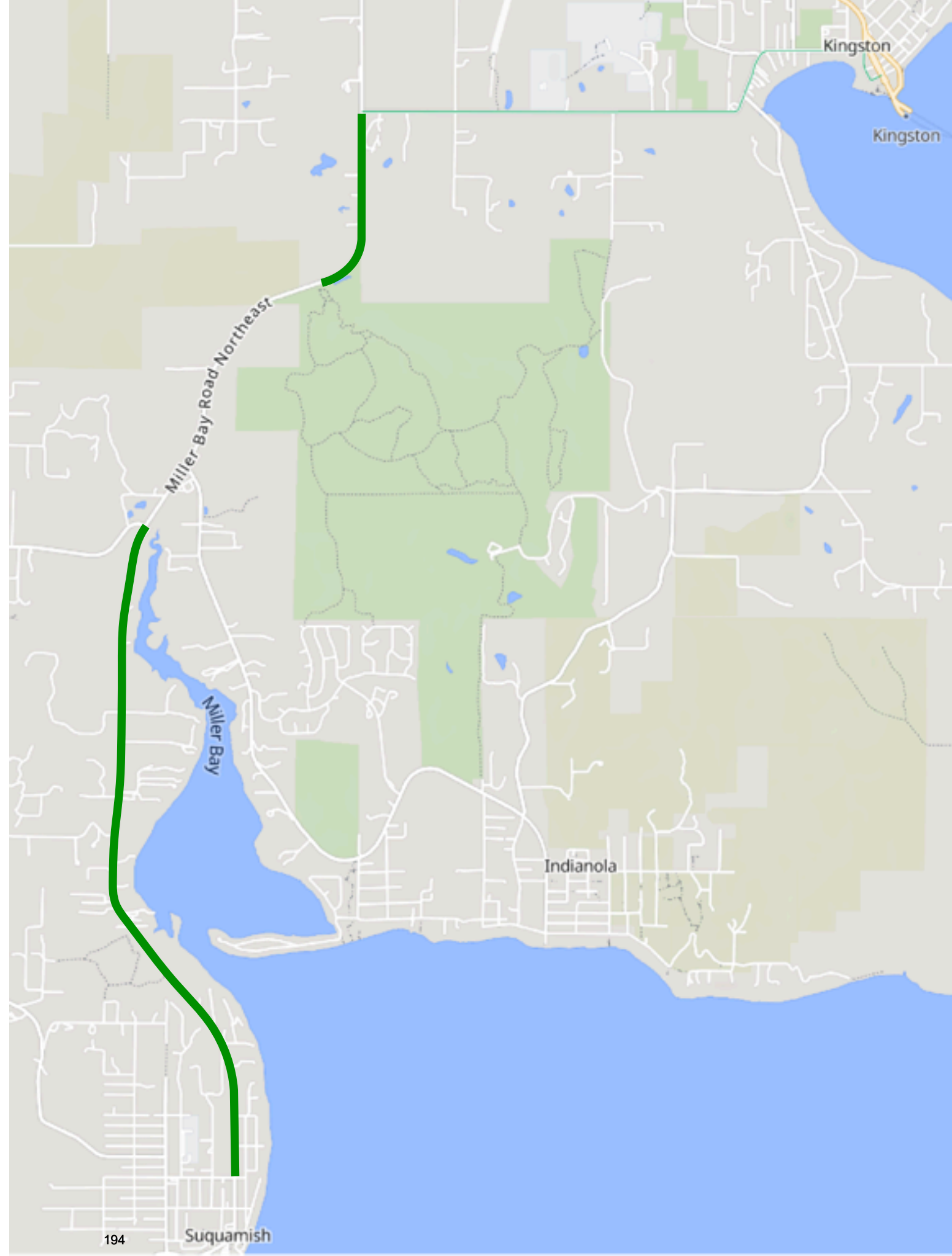
## What can happen to Non-motorized Six-Year TIP projects over time?

Six-Year TIP Resolutions were reviewed from 2010 to 2023 looking only at projects that enhance active transportation. County Commissioners review these projects only once a year, so it would be difficult to compile an ongoing record that reveals what happens to these projects that are felt to be valuable enough to the community to be prioritized in the TIP.

## 1. Miller Bay Road Paved Shoulders District 1

Miller Bay Rd is dangerous for cyclists. It is a segment of the Mosquito Fleet Trail, listed “high priority” for bike lanes or a shared use path in the 2001 Bicycle Facilities Plan.

It is also County Bike Route #51 in the 2013 NMP, which prioritizes it for bike facilities to connect Bainbridge Island and Suquamish to Kingston.





There was a concerted effort by the bike community in 2015 and 2016 to improve the safety of Miller Bay Road for bike users, and a collective sigh of relief when these projects showed up on the TIP, with construction planned for six years out. The community believed it would happen. Gravel shoulders were subsequently added in a few places. Then these projects were removed from the TIP. The advertised paved road shoulders were never built.

### Miller Bay Rd north

05 – Minor Widening

— Grant Funding Source —

LOCAL FUNDS	TOTAL	YEAR 1 2012	YEAR 2 2013	YEAR 3 2014	YEAR 4 2015	YEAR 5 2016	YEAR 6 2017	
395	395				15	365	15	2017
15	15					15		
2,370	2,370						2,370	
2,780	2,780				15	365	2,385	
								1
365	365						365	2018
15	15						15	
380	380						380	
365	365					65	300	2019
15	15						15	
0	0							
330	330					65	315	

### Miller Bay Rd south

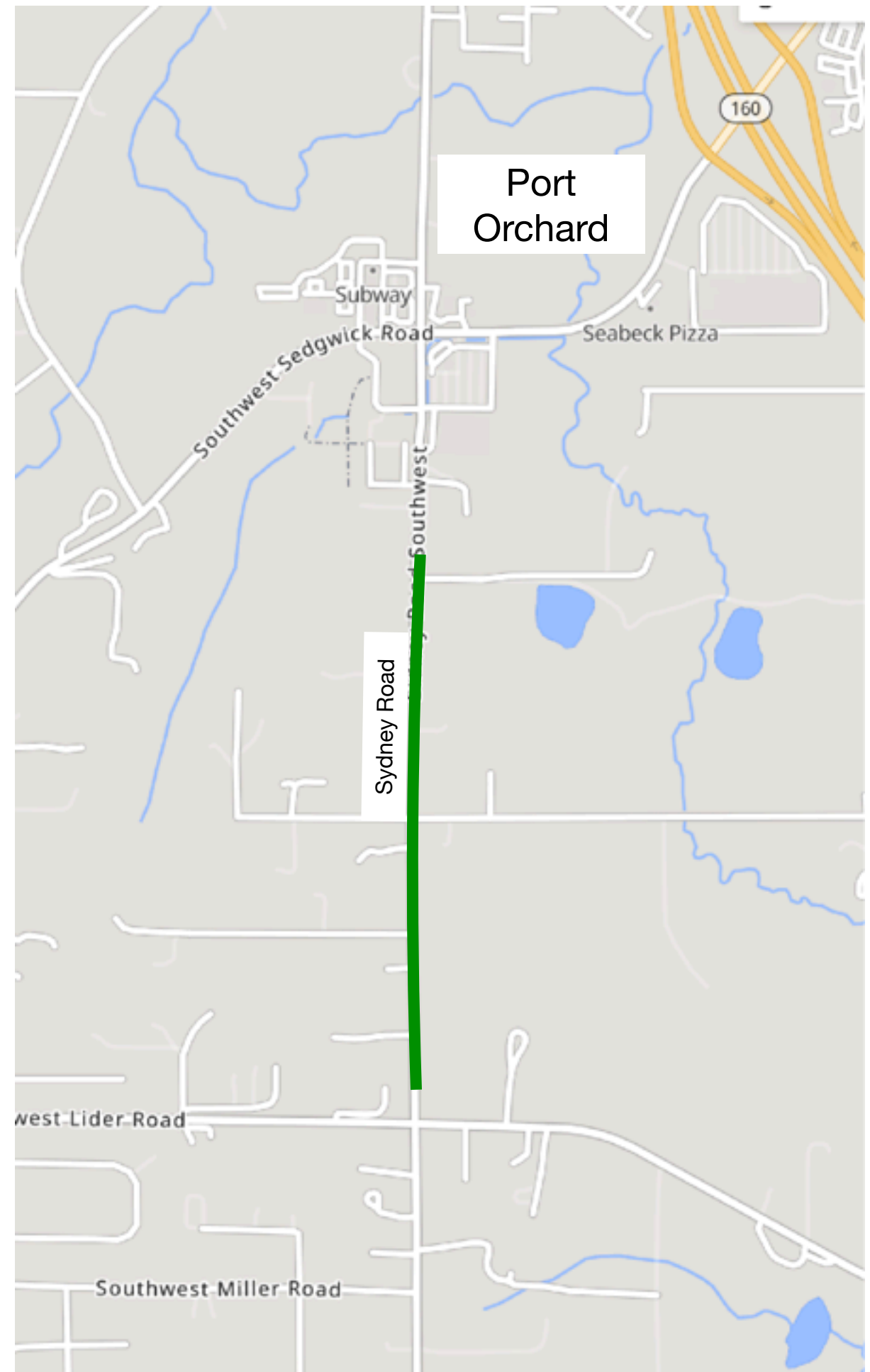
16 07	70370 / 70320 Miller Bay Road / Augusta Avenue Gunderson Road to Geneva Street (Pave shoulders)	06	S	2.76	C,G,P, T,W	P.E. R/W Const. Total	1/18 1/20 5/21	900 200 3,145 4,245	900 200 3,145 4,245				25 75 650 750	150 100 3,145 3,395			2017
16 07	70370 / 70320 Miller Bay Road / Augusta Avenue Gunderson Road to Geneva Street (Pave shoulders)	06	S	2.76	C,G,P, T,W	P.E. R/W Const. Total	1/20 1/22 5/23	900 200 3,145 4,245	900 200 3,145 4,245				25 75 750 750	150 100 3,145 3,395		2	2018
07 16	70370 / 70320 Miller Bay Road / Augusta Avenue Gunderson Road to Geneva Street (Pave shoulders)	06	S	2.76	C,G,P, T,W	P.E. R/W Const. Total	9/20 4/23 5/24	800 200 3,145 4,145	800 200 3,145 4,145				5 20 75 800	60 150 3,145 3,245			2019

Shown above are the projects on two different sections of Miller Bay Rd. No outside grant funding was ever obtained. The “Improvement Type” is shown as “minor widening” or “other enhancements”, and not “non-motorized project”, (#32). Each subsequent year the project was moved a year or more further out. From the data presented, it does not appear that any of these projects were given an engineering study to determine feasibility or cost for implementing a final design. The need for north-south multimodal safety improvements on Miller Bay Road is greater than ever, and will only increase.

## 2. Sydney Road 6-foot paved shoulders District 2

Sydney Road is an important community connection for bicycles between Port Orchard and Gig Harbor. It is designated County Bike Route #25 south of the Port Orchard City limits in the 2013 and 2018 Non-motorized Plans, and the City of Port Orchard plans to provide bike lanes on Pottery Road to the southern city limits where Sydney Road begins. However, Sydney Road, for 0.6 miles in this location, is hazardous for cyclists due to the absence of any kind of bike facility or paved shoulder.

This project is categorized as “minor road widening”, not “non-motorized”. Two years ago the city of Port Orchard was told this project would definitely be built, but it has been on the Six-Year TIP for over **12 years**, and has never received outside grant funding.





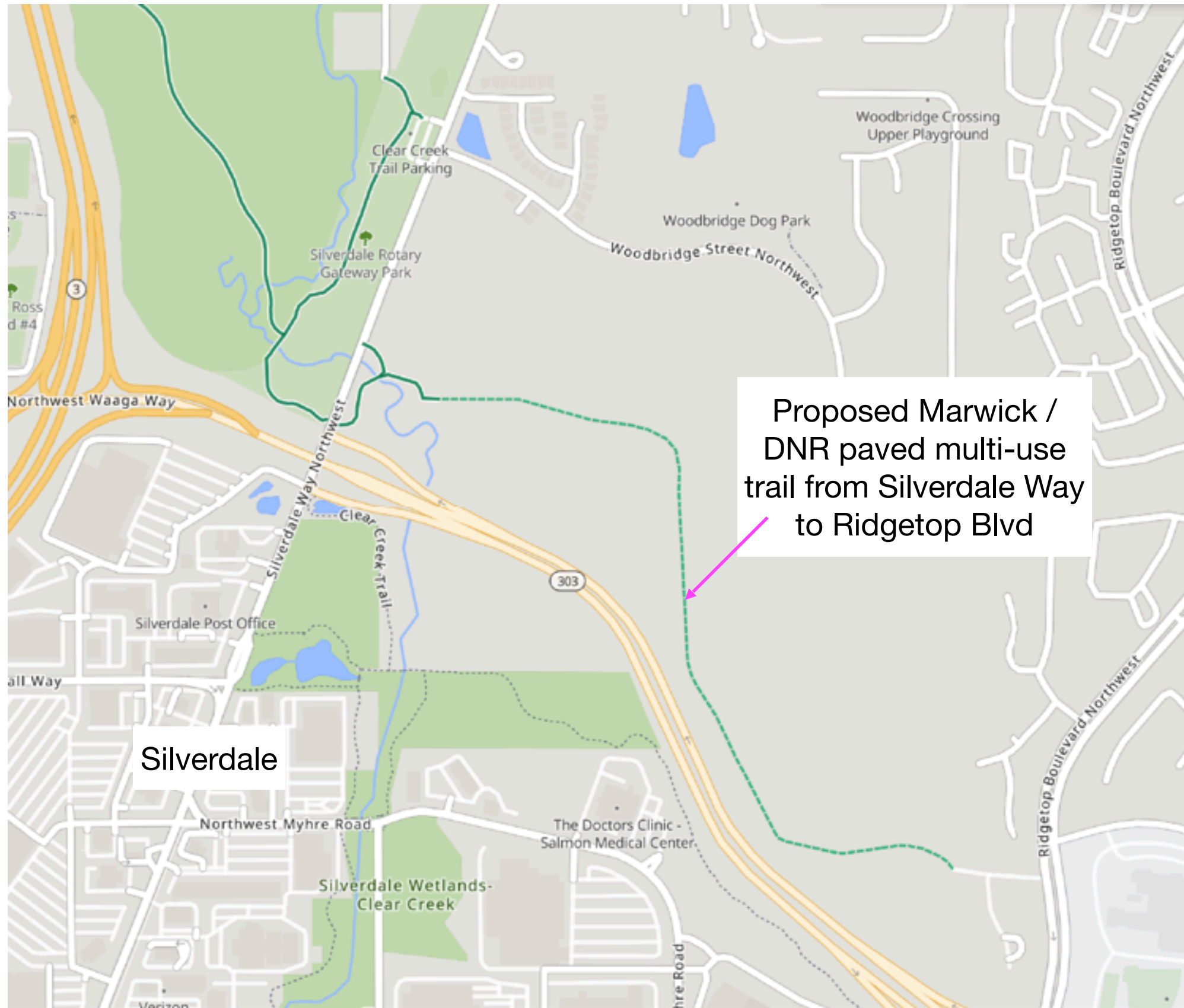
# Sydney Road TIP - Why were these 6-foot paved shoulders never built?

-- Grant Funding Source --

										LOCAL	TOTAL	YEAR 1	YEAR 2	YEAR 3	YEAR 4	YEAR 5	YEAR 6	INDEX	TYPE	EQ?	COMPI	H/YE
										CRIMDC		2014	2015	2016	2017	2018	2019					
16	58	21109	Sidney Road - Shoulders	06	S	0.68	C,P,T	P.E.	1/16	68	68						68					2011
			106 feet south of Lider Road to Port Orchard City Limits					R/W			0											
			Construct 6 feet paved shoulders					Const.			0											
								Total		60	60						68					
16	61	21109	Sidney Road - Shoulders	06	S	0.68	C,P,T	P.E.	1/16	70	70						40	30				2012
			106 feet south of Lider Road to Port Orchard City Limits					R/W	6/16	25	25					15	10					
			Construct 6 feet paved shoulders					Const.	6/17	650	650					650						
								Total		0	745	745				65	690					
16	56	21109	Sidney Road - Shoulders	06	S	0.68	C,P,T	P.E.	10/14	85	85		5	10	40	30						2013
			106 feet south of Lider Road to Port Orchard City Limits					R/W	6/16	25	25				15	10						
			Construct 6 feet paved shoulders, Contract					Const.	6/17	650	650				650							
								Total		0	760	760	5	10	55	690	0					
16	38	21109 CRP# 2585	Sidney Road - Shoulders	06	S	0.68	C,P,T	P.E.	10/14	85	85	5	10	40	30							2014
			106 feet south of Lider Road to Port Orchard City Limits					R/W	6/16	25	25			15	10							
			Construct 6 feet paved shoulders, Contract					Const.	4/17	650	650			650								
								Total		760	760	5	10	55	690							
16	38	21109 CRP# 2585	Sidney Road - Shoulders	06	S	0.68	C,P,T	P.E.	1/16	80	80	5	10	40	25							2015
			130 feet south of Lider Road to Port Orchard City Limits					R/W	6/17	25	25			15	10							
			Construct 6 feet paved shoulders, Contract					Const.	4/18	650	650			650								
								Total		755	755	5	10	55	685							
16	33	21108 CRP# 2585	Sidney Road - Shoulders	06	S	0.68	C,P,T	P.E.	1/16	75	75	10	40	25								2016
			106 feet south of Lider Road to Port Orchard City Limits					R/W	6/17	25	25			15	10							
			Construct 6 feet paved shoulders					Const.	4/18	650	650			650								
								Total		750	750	10	55	685								
16	32	21109 CRP# 2585	Sidney Road - Shoulders	06	S	0.68	C,P,T	P.E.	1/16	65	65	20	40	5								2017
			106 feet south of Lider Road to Port Orchard City Limits					R/W	6/18	25	25			15	10							
			Construct 6 feet paved shoulders					Const.	4/19	650	650			650								
								Total		740	740	20	55	885								
16	25	21109 CRP# 2585	Sidney Road - Shoulders	06	S	0.68	C,P,T	P.E.	1/16	45	45	40	5									2018
			106 feet south of Lider Road to Port Orchard City Limits					R/W	6/18	25	25	15	10									
			Construct 6 feet paved shoulders					Const.	4/19	650	650			650								
								Total		720	720	55	665									
16	30	21109 CRP# 2585	Sidney Road - Shoulders	06	S	0.68	C,P,T	P.E.	1/20	50	50		5	35	10							2019
			166 feet south of Lider Road to Port Orchard City Limits					R/W	1/21	15	15			10	5							
			Construct 6 feet paved shoulders					Const.	4/22	850	850			850								
								Total		0	915	915	0	5	45	865						
16	32	21109 CRP# 2585	Sidney Road - Shoulders	05		0.56		P.E.	S 5/23	50	50				25	25						
			Port Orchard city limits to Lider Road					R/W	S 1/24	15	15					15						
			Construct 6 feet paved shoulders					Const.	S 4/25	850	850					850						
								Total		0	915	915				25	40	850				
16	31	21109 CRP# 2585	Sidney Road - Shoulders	05		0.56		P.E.	S 5/23	50	50			25	25							
			Port Orchard city limits to Lider Road					R/W	S 1/24	15	15				15							
			Construct 6 feet paved shoulders					Const.	S 4/25	850	850					850						
								Total		0	915	915			25	40	850					
16	27	21109 MP 5.95-6.45 T3 CRP# 2585	Sidney Road - Shoulders	05		0.56		P.E.	S 5/23	50	50		25	25								
			Port Orchard city limits to Lider Road					R/W	S 1/24	15	15			15								
			Construct 6 feet paved shoulders					Const.	S 4/25	850	850				850							
								Total		0	915	915	25	40	850							



### 3. Marwick / DNR paved multi-use trail from Silverdale Way to Ridgetop Blvd. - District 3



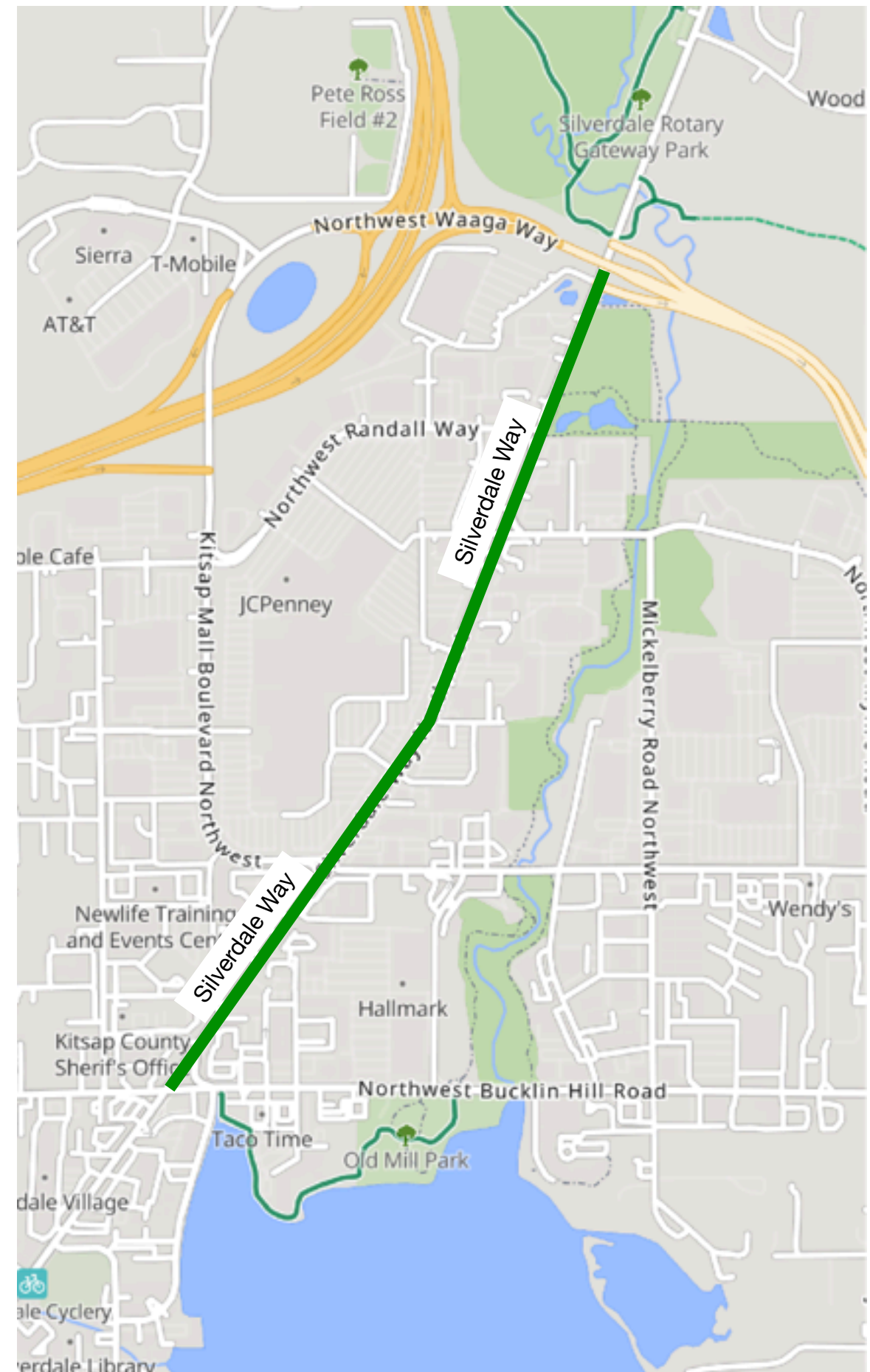
The Marwick / DNR paved multi-use trail was on the Six-Year TIP between 2015 and 2020. It would safety connect the bike facilities on Ridgetop Blvd to Silverdale Way on an off-road paved path. Current connections between Ridgetop and Silverdale are on extremely busy roadways without bike facilities. No outside grant funding was obtained for this project for the duration it was on the TIP. For many years our community had hope this project would be built, and then it was deleted from the TIP.

-- Grant Funding Source --										LOCAL	TOTAL	YEAR 1	YEAR 2	YEAR 3	YEAR 4	YEAR 5	YEAR 6			
N/A	48	N/A CRP # 3656	32	S	0.75	N/A	P.E.	1/16				145	145		5	65	70	5		2015
		Markwick / DNR Trail					R/W					0	0							
		Silverdale Way to Ridgetop Blvd.					Const.	7/19				775	775					775		
		Construct a hard surface trail through DNR property					Total					920	920	0	5	65	70	780	3	
N/A	47	N/A CRP # 3656	32	S	0.75	N/A	P.E.	1/16				145	145	5	65	70	5			2016
		Markwick / DNR Trail					R/W													
		Silverdale Way to Ridgetop Blvd.					Const.	7/19				775	775					775		
		Construct multi use trail					Total					920	920	5	65	70	780		3	
N/A	36	N/A CRP # 3657	32	S	0.75	N/A	P.E.	1/17				140	140	65	70	5				2017
		Markwick / DNR Trail					R/W	1/18				25	25		25					
		Silverdale Way to Ridgetop Blvd.					Const.	6/19				775	775					775		
		Construct multi use trail					Total					940	940	65	95	780			3	
N/A	37	N/A CRP # 3657	32	S	0.75	N/A	P.E.	1/17				175	175	50	100	25				2018
		Markwick / DNR Trail					R/W	1/19				15	15		15					
		Silverdale Way to Ridgetop Blvd.					Const.	6/20				1,025	1,025					1,025		
		Construct multi use trail					Total					1,215	1,215	50	115	1,050			3	
N/A	24	N/A CRP # 3657	32	S	0.75	N/A	P.E.	1/17				135	135	25	100	10				2019
		Markwick / DNR Trail					R/W	1/19				20	20	15	5					
		Silverdale Way to Ridgetop Blvd.					Const.	6/21				1,025	1,025					1,025		
		Construct multi use trail					Total				0	0	0	1,180	1,180	40	105	1,035		
N/A	38	CRP # 3657	32		0.75		P.E.	S 1/17				0	0							2020
		Markwick / DNR Trail					R/W	S 1/19				10	10					10		
		Silverdale Way to Ridgetop Blvd.					Const.					0	0							
		Construct multi use trail					Total				0	0	0	10	10			10		

#### 4. Silverdale Way Road Preservation Project - District 3

The listed improvement type for this project is “road resurfacing”, #7. Road preservation projects are the ideal time to re-channelize roads to include bike facilities, so inclusion of “Bicycle/Pedestrian facilities” in this project was warmly accepted by the bike community. A safe north-south bike route through Silverdale is sorely needed, and essential for north-south county network connectivity. Only, it is unclear how bike facilities could be added to busy 5-lane Silverdale Way in this location - there are no paved shoulders.

No bike facilities were built.



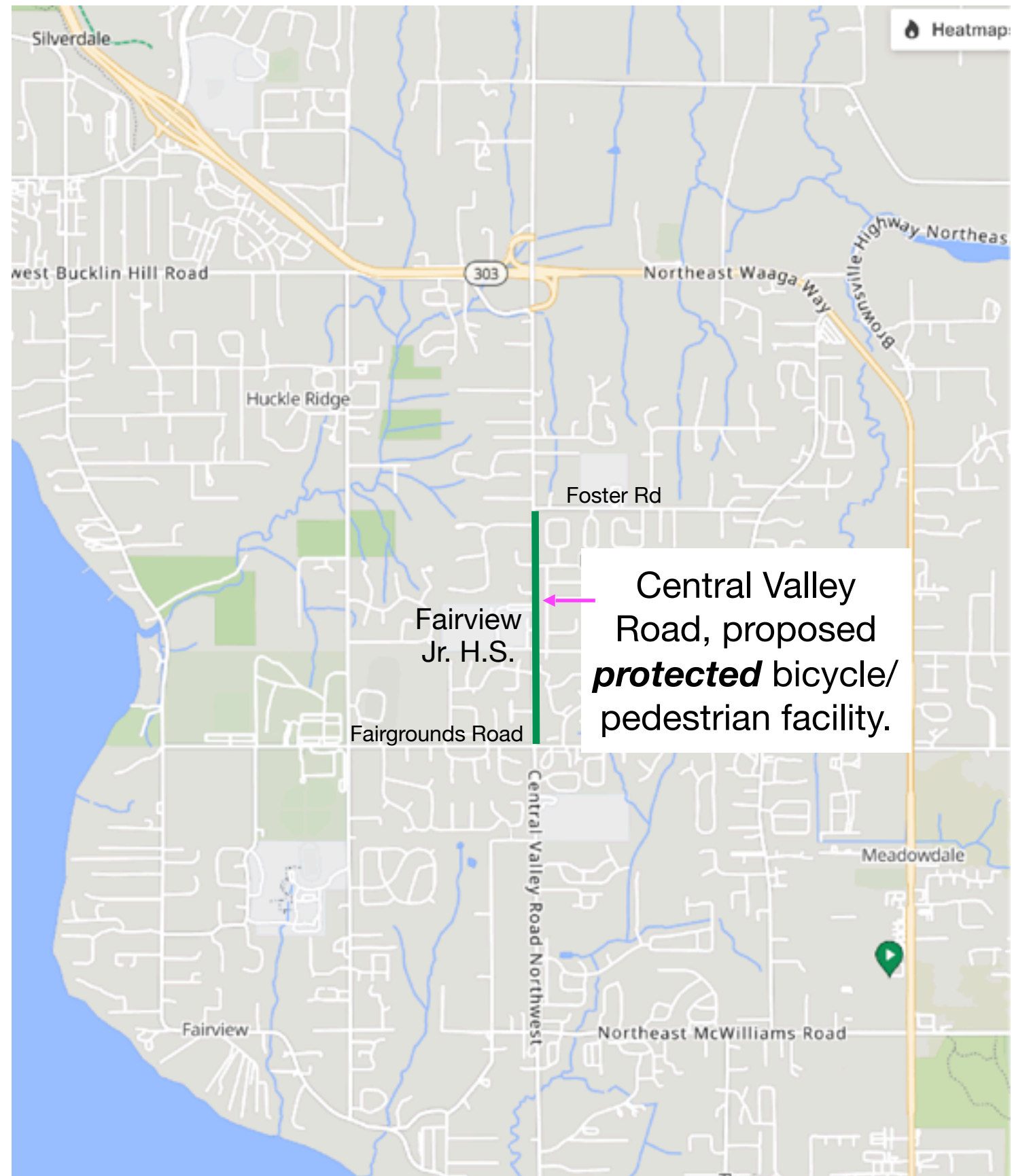


## Silverdale Way Road Preservation Project - District 3

[illegible]

## 5. Central Valley Road Protected Bicycle/Pedestrian Facility (adjacent to Fairview Middle School) - District 3

This section of Central Valley Road is part of County Bike Route #33. It has been on the Six-Year TIP for 6 years classified as an “other improvement” project type, rather than as “non-motorized”. SRTS grant funding has been available for at least three years, so the odds are good something will be built. However, for five years the project was described as a protected bicycle/pedestrian facility, physically separated from cars, but in 2022 it is no longer listed that way. Were Commissioners given an explanation for downgrading the length and scope of this project? The public had five years of expectations, and it is now unclear what sort of facility will be built. Regardless of the outcome, there is no designated bike facility north or south of this isolated 0.6 mile section of Bike Route #33.



## Central Valley Road Protected Bicycle/Pedestrian Facility (adjacent to Fairview Middle School) - District 3

[illegible]



## **Suggested modifications to the Non-motorized Plan to better implement policy goals.**

There is no ambiguity as to policy objectives in the County's Non-Motorized Plans.

The goals of the **2001 Bike Facilities Plan** were to

- “Interconnect neighborhoods” (p 25)
- “Develop commuter routes” (p 25)
- “Interconnect urban areas and communities, e.g., Silverdale with Bremerton; Kingston with Indianola; Port Orchard with Belfair” (p 26)
- “Create a contiguous non-motorized transportation system which integrates on- and off-road facilities.” (p 9)
- “Assign top priority to the implementation of bicycle facilities and/or pedestrian facilities designated in the Kitsap County Bicycle Facilities Plan.” (p 26)

From KRRC's **2010 Looking for Linkage** document:

“Bicycle routes, like roads, need to be designed and built to connect one place to another. We would not build a road half way to nowhere, without a safe means to reach the destination. Many of the bike improvement projects in Kitsap have been built in short segments, as part of a larger car-oriented road improvement project. Though well-intentioned as "opportunity projects", this policy creates short sections of bicycle lane that suddenly disappear, leaving both cyclists and autos to merge without warning.” (p 100)

The **2013 Kitsap County Non-motorized Plan** introduced a new “Bike Route System” intended to:

“provide a comprehensive, north/south – east/west system linking highly used destinations as well as connections to the cities and population centers as the preferred priority. This route system provides for logical regional – and sub-regional – connections through the entire county and serves as a basis for programming future segment improvements to ensure continued connectivity versus an isolated project that provides no connectivity.” (p32)

The Non-Motorized plan needs to be replaced by an active transportation plan of much greater clarity - one that facilitates oversight by elected officials. Bike facility definitions should be consistent with WSDOT's definitions. The definitions of Bikeway, Bike Route, and Deficient Segment need to be revised to describe facilities in a manner that proves useful to bicyclists, and facilitates implementation of policy. An organization proficient in non-motorized planning should be hired to create the new plan, like Alta, a pioneer in the field of active transportation. The new plan should contain no vague and easily mis-interpreted data or maps that would further delay implementing the vision successive County Commissions have for the Kitsap Peninsula.

The most recent (2018) NMP has a County-wide graphic called "Non-motorized Routes". The lines on that map *should* distinguish between existing, funded, and hoped for facilities to be useful, as well as their level of safety, but none of these distinctions are made. There can be no accountability for implementing policy if the data presented is ambiguous. However, the map does comply with the definition of "Bicycle Route" set forth in the plan's appendix, since any road can be designated a bike route, and, apparently, any "concept" or future plan can be designated a bike route also. More than two-thirds of the "routes" shown on that map have no paved shoulder, some of these have 50 mph speed limits.

It is unrealistic for County Commissioners to personally track implementation of policy as was done for this presentation, but they *can* choose to have Public Works do this for them, using as criteria WSDOT definitions of bike facility types. An easily obtained *objective* measure of how well Public Works implements bike policy could be:

Annually report the miles of each type of bike facility, and how many miles of these are along the County's prioritized 20 numbered bike routes. This is an *objective* performance measure, since bike facilities are well-defined, unlike "paved shoulders.

The total miles of bike facilities on the County's 172 miles of numbered bike routes is currently 0.3 miles.

Because “connectivity” is the primary policy theme of every non-motorized plan since 2001, County Commissioners could request an annual objective measure of **bike facility connectedness**, with the expectation that it would increase year to year. Roads for cars all connect to each other - anyone can drive anywhere. To improve *bike* network connectivity, bike facilities also need to connect to each other. An easily obtained objective measure is as follows:

Add the total miles of bike facilities *greater than one mile in length*, built and maintained by the County, within unincorporated Kitsap County. Any bike facility that “touches” a bike facility of one mile or longer in length is considered part of that facility for the purpose of meeting the one mile length criteria. This would include bike facilities outside of unincorporated Kitsap County.

This objective performance measure would encourage staff to connect any new bike facility segment to an existing spine so it adds to the total. Connectedness, measured in this way, reflects the public’s ease of access to parks, public transit and health facilities. The more bike facilities connect to one another, the easier it will be for bike users to safely get to wherever it is they want to go.

Every effort should be made to connect stand alone grant-funded projects with other bike facilities - and this effort has more to do with the attitude and motivation of staff than any written document. Therefore, that attitude and motivation should be decisive qualities when hiring new staff. Paid training in bike and pedestrian planning would give staff new tools and options to implement policy. Federal bike facility standards were recently expanded to include design guides produced by the National Association of City Transportation Officials (NACTO), which are more flexible than previous federal standards with regard to implementing bike facilities. Much of Kitsap County has become less rural and more suburban and urban, so continuing to use “rural” design guidelines (like paving shoulders instead of designating marked bike facilities) along dense population corridors is counter productive from a safety standpoint.



Paved four-foot (and wider) road shoulders are welcomed by cyclists when bike facilities are absent. This **shared** facility is less safe than any **bike** facility, however, its value to cyclists is substantial in the absence of bike facilities. IF paved road shoulders are to be included in a description of a bike facility network, they should be clearly marked as distinct from bike facilities, and defined in a way that cyclists could use such information to make safe choices. Such paved shoulders should meet the following criteria:

- Be identified on the map as being an existing road with minimum four-foot shoulders on both sides of the road.
- Be at least one mile in length (that value includes the length of any bike facility connected directly to it). This would preclude short segments of no value to cyclists.
- Vehicular speeds and volumes should be less than on state highways, and the width of such shoulders should increase as the speed and volume of traffic increases as per state and national guidelines.

That said, “paved road shoulders” rarely appear on bike facilities maps for bicyclists, probably because such facilities aren’t useful to cyclists without carefully defining the term.

Kitsap County bike planning maps should include bike facilities within municipalities, color coded as such. This will facilitate planning and project prioritization to connect to these bike facilities, where most Kitsap bike facilities currently reside. Cyclists value safe connectivity more than the type of facility used or the responsible jurisdiction.

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### **Suggested Modifications to the Transportation Improvement Program to better implement Policy Goals.**

Vehicle road funds and project prioritization should be completely separated from non-motorized transportation funds and non-motorized project prioritization criteria. This should ensure at least minimal funding for bike facility transportation projects. Grants for non-motorized projects do not have to be associated with a road improvement project for motor vehicles.

TIP prioritization is highly subjective, and unfinished TIP projects can currently be postponed indefinitely, downgraded, or deleted without prior authorization. Although Commissioners can view projects placed on the annual Six-Year TIP, they are probably not notified when Public Works decides to remove a non-motorized project from succeeding Six-Year TIPs. Therefore, a removal should be accompanied by an explanation to the County Commissioners or the County Administrator that includes a history of that TIP project over time (as the examples shown in this presentation) and some evidence of good faith attempts to obtain grant funding. No project accepted into the Six-Year TIP should be considered infeasible at some later time.

Every project in the Six-Year TIP is assigned one or more “Improvement Type Codes”. The only code currently associated with non-motorized improvements is type code #32, “**Non-Motorized Vehicle Project**”, which is, perhaps, too specific, and the reason bike improvements are often only *suggested* by a code such as “Minor Widening” (#5) or “Other Enhancements” (#6). Any project in the Six-Year TIP that has non-motorized components and expands the bike network should include an indication of that as one of the improvement types. That way all non-motorized improvements could be tracked retrospectively. Jefferson County uses an Improvement Type Code for “Facilities for Pedestrians and Bicycles, (#28). This code accompanies many types of projects. Jefferson then groups projects into five major categories, one of which is “Non-motorized Transportation”. Projects are ranked in order of priority **within each funding category**. Categories are not seen as competing for funds with one another. Nine of Jefferson’s 26 projects for the 2020 TIP are in the non-motorized category.

The only bike facility built on Kitsap County’s 172 miles of twenty numbered bike routes is 0.3 miles of bike lanes on Bucklin Hill Road (Bike Route #44). That federally funded project was given an Improvement Type Code of “New Bridge Construction, #8” and “Environmentally Related, #13”. The bike lanes were incidental, and terminate abruptly at each end of the project.

Ongoing maintenance responsibilities such as pavement preservation and re-striping is the opportune time to build the bike facilities identified in Kitsap County Non-motorized Plans - it is the usual and accepted mechanism for doing so. This is a common provision in Complete Streets Ordinances that saves money and builds connectivity incrementally during the normal ongoing process of roadway maintenance. Connecting road upgrades that include new bike facilities to existing bike facilities should be included in the scope of such projects. Buffered or separated bike lanes could have been built on Viking Way, Silverdale Way, and Chico Way years ago during past resurfacing projects for little additional money. “Bike Lanes” were given a high priority for these roads in the 2001 Bike Facilities Plan.



## APPENDIX A SIX YEAR TIP PUBLIC INPUT PROCESS FLOW CHART

### PROFESSIONAL INPUT

Recommendations from:  
⇒ Public Works (PW)  
⇒ Planning Commission  
⇒ Board of Clallam County Commissioners (BCCC)  
⇒ Dept. of Community Dev

PW scores proposed projects  
PW publishes notices, mails surveys and polls  
PW holds one or more informational meetings

TIP submitted in booklet form (layman terms) and required spreadsheet formats

PW reviews recommendations prior to preparing Final Draft TIP

PW presents plan and addresses BCCC questions

Recommendations from:  
⇒ Public Works  
⇒ Planning Commission

### PROJECT CONCEPTION

### PUBLIC INPUT ON NEWLY PROPOSED TIP PROJECTS AND CONCEPT REVIEW

### DRAFT TIP SUBMITTED TO PLANNING COMMISSION FOR REVIEW AND COMMENT

### PLANNING COMMISSION TIP RECOMMENDATION SUBMITTED TO BCCC AND PUBLIC WORKS DEPT.

### FINAL DRAFT TIP SUBMITTED TO BCCC AT ADVERTISED WORKSESSION

### BCCC HOLDS PUBLIC HEARING ON TIP

### BCCC APPROVES AND ADOPTS SIX-YEAR TIP

### PUBLIC INPUT

Public submits individual or group "Project Request Form" for consideration

Public completes and submits comment polls or surveys  
Public submits written comments  
Public may attend and comment at scheduled informational meetings

Public may attend and comment during formal hearing

Public record passed on with recommendations

Public may attend meeting

Public may attend and comment during public hearing

I found the 2003 Clallam County public input process for Six-Year TIP selections online, shown at right. It is quite different from Kitsap's. There are numerous opportunities to comment before any TIP proposal is adopted.

Commissioners are given the opportunity to make changes at the penultimate hearing, circled in red at right.

I don't recall being given an opportunity to comment on any Kitsap Six-Year TIP proposal before the final TIP was presented to the public.

I've always wondered what sort of Bike/Pedestrian Facility was contemplated for Silverdale Way between Waaga Way and Bucklin Hill Rd.

## 2020 - 2025 TIP by Project Category and Funding Type

### TIP # Project Description

		Fund Status	Local	Other	State	Federal	Total
<b>Permanent Repairs &amp; Mitigation for Emergency Projects</b>							
14	UPPER HOH ROAD SPRUCE CREEK MITIGATION MP9.7 TO MP9.8	P	\$ 19,304			\$ 123,696	\$ 143,000
Category Subtotal			\$ 19,304	\$ -	\$ -	\$ 123,696	\$ 143,000

		Fund Status	Local	Other	State	Federal	Total
<b>Road &amp; Intersection Improvements</b>							
2	UPPER HOH ROAD PHASE 2 MP0.00 TO MP12.04 FLAP	S	\$ 10,000			\$ -	\$ 10,000
4	QUILCENE CENTER ROAD REBUILD MP14.61 TO MP15.01	S	\$ 80,500		\$ 569,000		\$ 649,500
6	UNDI ROAD BYPASS MP0.90 TO MP2.185 FLAP	S	\$ 8,900			\$ -	\$ 8,900
7	UPPER HOH ROAD PAVEMENT PRESERVATION MP0.00 TO MP12.04	S	\$ -		\$ 408,400		\$ 408,400
15	SOUTH DISCOVERY ROAD 3R MP4.52 TO MP4.84	P	\$ 85,400		\$ 768,600		\$ 854,000
16	CENTER ROAD ASPHALT OVERLAY MP13.34 TO MP14.50	P	\$ 190,000		\$ 1,710,000		\$ 1,900,000
18	RICK TOLLEFSON TRAIL BALLFIELD CONNECTION	P	\$ 154,170		\$ -		\$ 154,170
Category Subtotal			\$ 528,970	\$ -	\$ 3,456,000	\$ -	\$ 3,984,970

		Fund Status	Local	Other	State	Federal	Total
<b>Culvert Correction &amp; Bridge Work</b>							
8	NAYLORS CREEK CULVERT REPLACEMENTS	S/P	\$ 31,150		\$ 1,051,850	\$ 165,000	\$ 1,248,000
9	THORNDYKE CREEK CULVERT REPLACEMENT	S/P	\$ 30,000		\$ 1,458,750	\$ 242,250	\$ 1,729,000
11	SNOW CREEK ROAD CULVERT REPLACEMENT MP0.84	P	\$ 184,640		\$ -	\$ 1,292,408	\$ 1,477,126
17	CENTER ROAD CULVERT CORRECTION-CHIMACUM CR. MP3.26	P	\$ 30,000		\$ 2,197,500	\$ 352,500	\$ 2,580,000
Category Subtotal			\$ 275,790	\$ -	\$ 4,706,100	\$ 2,052,236	\$ 7,034,126

		Fund Status	Local	Other	State	Federal	Total
<b>Non-Motorized Transportation</b>							
1	QUILCENE COMPLETE STREETS PHASE 1	S	\$ 62,416		\$ 695,350		\$ 757,766
3	CEDAR AVENUE AT NESS' CORNER RD. SR116 TO HAYDEN RD	S	\$ -		\$ 840,300		\$ 840,300
4	QUILCENE CENTER ROAD REBUILD MP14.61 TO MP15.01	S	\$ -	\$ 65,000	\$ -		\$ 65,000
5	OLYMPIC DISCOVERY TRAIL - CONNECTION. 4 CORNERS - ST PK	S/P	\$ -		\$ 2,759,000		\$ 2,759,000
10	OLYMPIC DISCOVERY TRAIL - CONNECTION. SO DISCO BAY - ST PK	S	\$ -		\$ 74,000		\$ 74,000
19	HJ CARROLL PARK TO WEST VALLEY ROAD PED-BIKE	P	\$ 10,000		\$ 548,750		\$ 558,750
20	QUILCENE COMPLETE STREETS PHASE 2	P	\$ -		\$ 1,341,750		\$ 1,341,750
21	RICK TOLLEFSON TRAIL PHASE 2	P	\$ -		\$ 975,000		\$ 975,000
22	ODT SOUTH DISCOVERY BAY - SEGMENT B	P	\$ 252,000		\$ 2,260,000		\$ 2,520,000
Category Subtotal			\$ 324,416	\$ 65,000	\$ 9,502,150	\$ -	\$ 9,891,566

		Fund Status	Local	Other	State	Federal	Total
<b>Engineering Assessments &amp; Countywide Programs</b>							
12	COUNTYWIDE BRIDGE LOAD RE-RATING	S	\$ 17,375			\$ 111,325	\$ 128,700
13	OIL CITY ROAD ENGINEERING ASSESSMENT - FLAP	S	\$ 30,000			\$ -	\$ 30,000
23	DOSEWALLIPS ROAD ENGINEERING ASSESSMENT - FLAP	P	\$ 10,000			\$ -	\$ 10,000
24	COUNTYWIDE SAFETY IMPROVEMENTS	P	\$ 47,250			\$ 302,750	\$ 350,000
25	COUNTYWIDE BRIDGE IMPROVEMENTS	P	\$ 81,000			\$ 519,000	\$ 600,000
26	COUNTYWIDE VARIOUS IMPROVEMENTS	P	\$ 180,000			\$ -	\$ 180,000
Category Subtotal			\$ 365,625	\$ -	\$ -	\$ 933,075	\$ 1,298,700

### TYPE OF FUNDING:

Local	Other	State	Federal	Total
\$1,514,105	\$65,000	\$17,684,260	\$3,109,007	\$22,362,362

Example

Jefferson County sorts TIP projects into Categories, and prioritizes projects within each category for grant applications. Road projects do not compete with non-motorized projects for funding.

A detailed description of each project is available to any reviewer.

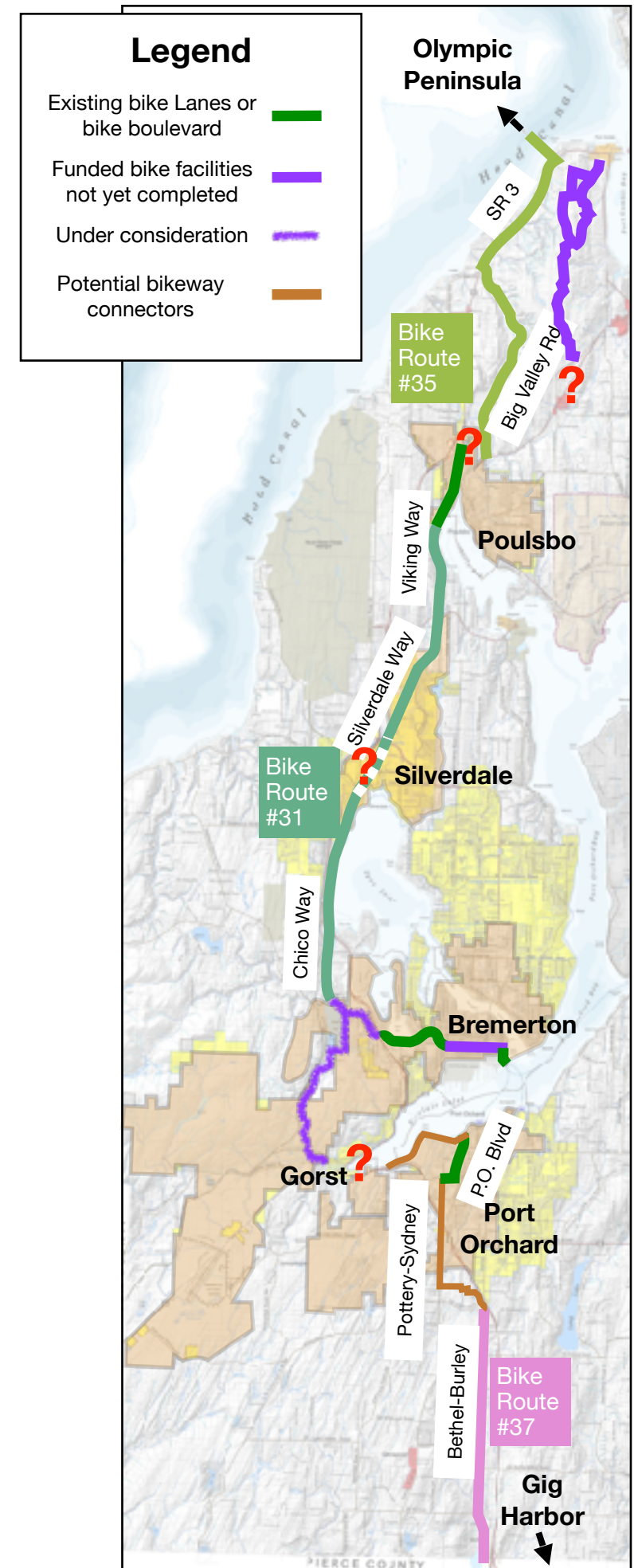
## A Way Forward

There is a short essay at the end of KRRC's 2010 "Looking for Linkage" document titled: Bicycle Routes: Opportunity vs. Connectivity. The author suggests a means to achieve connectivity and cost efficiency:

- "Designate and prioritize a spine route through the County that connects centers of population and employment, that will serve both transportation and fitness/recreation needs."
- "Develop the overall plan in prioritized phases; begin with the spine and complete missing links. Grow the "spokes" of the bike route as a connected system that will grow in complexity."

A north-south bike facility connecting Gig Harbor at the Cushman Trail to the Hood Canal Bridge would provide many recreational, transportation and economic benefits for Kitsap. The concept for a north-south spine bike facility is shown at right. Such a facility would set a new safety standard for Kitsap that will encourage new cross-connections.

We suggest a feasibility study for such a project be initiated by County Commissioners and awarded to a reputable transportation planning firm like Parametrix or Alta. This would replicate the process for funding and design of the North Kitsap Sound to Olympics Trail (STO). Planning should interface with Kitsap municipalities to integrate Non-Motorized Plans and connect to the STO.





Once a preferred alternative is established, these projects should become the highest priority for non-motorized transportation. This could be accomplished by Commissioners using the current car-centric prioritization criteria by assigning maximum points for Non-Motorized, Compliance with Plans, and Safety - a total of 34 prioritization points. A grant application for each successive phase should be mandated - which could add an additional 20 points. The state prioritizes fish passage improvements by mandating points for those projects in this way.

Viking Way, Chico Way, and Silverdale Way all have wide shoulders for the most part, and can become safer bike facilities by creating buffered bike lanes or using a road channelization similar to that chosen by the County for West Kingston Road. Bike facilities through Gorst and Silverdale have proven elusive but are essential as there is no acceptable non-motorized route at present. Solutions should be sought.

Adopt a policy *preference* for separated or buffered bike lanes along the on-road north-south non-motorized spine to support all ages and abilities. These are safer than simple bike lanes and much safer than paved shoulders, particularly at traffic speeds above 30 mph.

## SUMMARY OF RECOMMENDATIONS

1. Adopt WSDOT's definition of bike facilities, which do not include paved shoulders.
2. Separate TIP projects into categories, and prioritize each category using criteria unique to those projects.
3. Create a new, clearer, more definitive Active Transportation Plan using an outside firm proficient in such projects.
4. Track progress toward implementing policy goals by adopting objective performance measures to establish accountability. Use the "Level of Traffic Stress" (LTS) technique to analyze the bike network. LTS tracks bike facilities, not paved shoulders.
5. Enhance the public input process for TIP proposals before they are finalized.
6. Create a process to track successive Six-Year TIP projects from year to year. The public and County Commissioners should be as aware of projects removed from the TIP as those adopted into it.
7. Fund a feasibility study for an on-road North-South bike facility spine from Gig Harbor to the Sound to Olympics Trail / Hood Canal Bridge. The *County Commissioners* should then prioritize building it in phases.

Paul Dutky, Chair West Sound Cycling Club Advocacy Committee  
February 4, 2024

# Bike Facility Recommendations for Kitsap County 2024 Comprehensive Plan

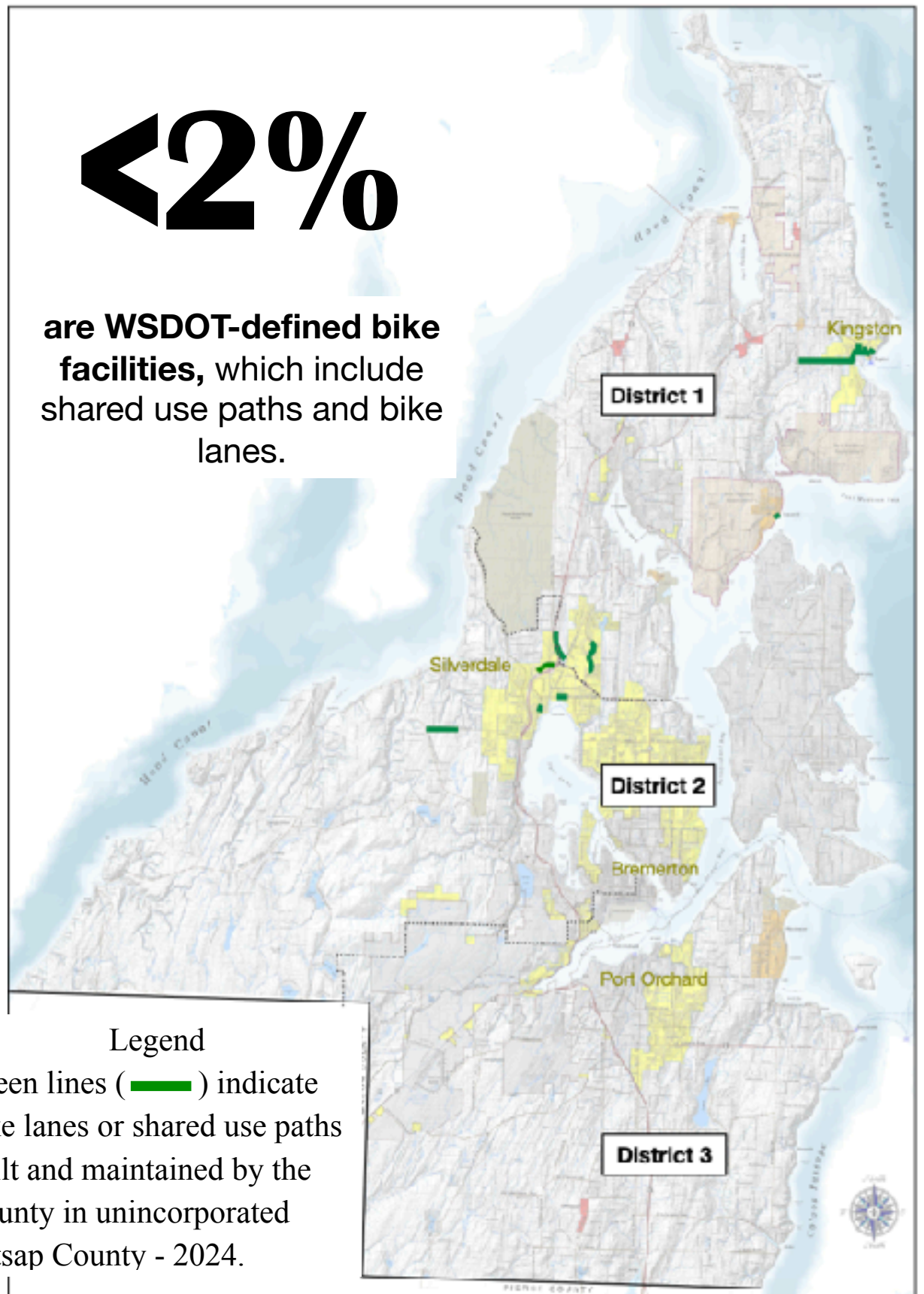
by Paul Dutky, Chair, Bike Advocacy Committee, West Sound Cycling Club.

Graphics and bike facility data by Paul Dutky

The policy objectives and goals expressed in the County's various transportation plans are worthy of implementation. The **2001 Bike Facilities Plan** prioritized 340 miles of bike facilities that were almost exclusively shared use paths and bike lanes. The Plan's stated objectives were":

- “Interconnect neighborhoods” (p 25)
- “Develop commuter routes” (p 25)
- “Interconnect urban areas and communities, e.g., Silverdale with Bremerton; Kingston with Indianola; Port Orchard with Belfair” (p 26)
- “Create a contiguous non-motorized transportation system which integrates on- and off-road facilities.” (p 9)
- “Assign top priority to the implementation of bicycle facilities and/or pedestrian facilities designated in the Kitsap County Bicycle Facilities Plan.” (p 26)

You can see from the map at right that current bike facilities are not contiguous, and do not interconnect urban areas. Both the 2010 Kitsap Regional Coordinating Council (KRCC) document, Looking for Linkage, and the 2013/2018 Kitsap County Non-Motorized Plan (NMP) acknowledge this failure.





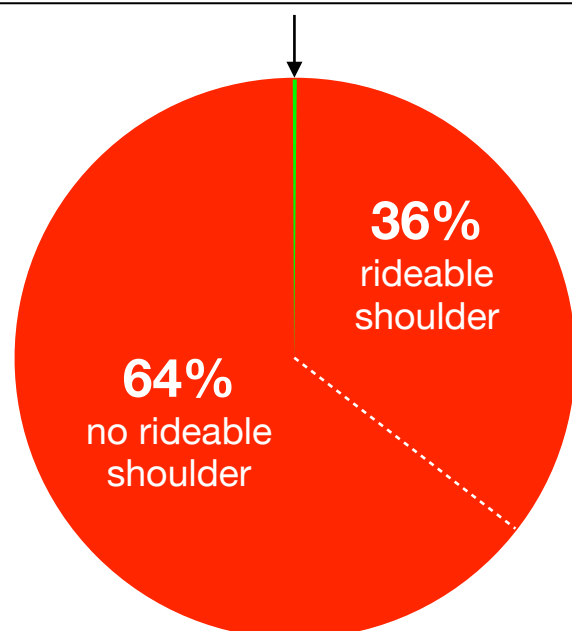
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The 2013 Kitsap County Non-motorized Plan introduced a new “Bike Route System” intended to:

“provide a comprehensive, north/south – east/west system linking highly used destinations as well as connections to the cities and population centers as the preferred priority. This route system . . . serves as a basis for programming future segment improvements to *ensure continued connectivity versus an isolated project that provides no connectivity.* (NMP, p32)

The graphic on slide 1 and the table at right reveal the failure of the new system to improve implementation of bike facilities.

WSDOT-defined bike facilities\*  
0.2%



\* WSDOT-defined bike facilities: Four feet or wider bike lanes, buffered bike lanes, protected bike lanes, cycle tracks, shared use paths, and neighborhood greenways. Paved shoulders are not a WSDOT-defined bike facility.

Numbered Bike Route	Total miles	Miles of rideable houlders	WSDOT-defined bike facilities	Comments re speed
20	3.6	2.4	0	Lake Flora Road (50 mph in places)
21	3.7	2.0	0	Seabeck Highway (50 mph in places)
25	9.2	3.2	0	Glenwood Rd, 40 mph
27	13.1	2.7	0	Clear Creek Rd (50 mph)
29	5.3	0	0	Gold Creek Rd
30	5.9	4.0	0	Southworth, 35-45 mph
31	11.9	10.7	0	Chico, Silverdale, Viking Ways (40-45 mph)
33	8.8	1.4	0	Central Valley Rd, 45 mph
35	9.4	0.4	0	SR-3/Big Valley/Lemolo Rd
37	8.2	6.8	0	Bethel Burley, 45 mph
38	16.1	5.7	0	Seabeck-Holly Rd (50 mph in places)
39	12.7	3.5	0	E.Bremerton-Bangor (50 mph on SR 305)
41	5.0	4.0	0	Port Gamble (50 mph on SR 104)
43	7.7	0	0	Dickerson Rd 35 mph
44	12.9	0.3	0.3	Bucklin Hill-Seabeck hwy
47	11.5	1.7	0	Banner - Ollala Valley Rd- Crescent Valley Rd
51	18.7	9.2	0	Hansville - Miller Bay Rd, 45 mph
64	3.7	0	0	Lincoln Rd-Suquamish
66	3.3	2.7	0	Indianola Rd
70	9.3	5.5	0	Bond Rd / SR 104, 50 mph
	180	66.2	0.3	

The overarching problem is that it is unsafe to walk or ride on most County Roads. The draft 2024 Comp Plan includes a host of road improvement projects listed in Appendix C and D that presumably address this issue.

What follows is:

- 1) An analysis of those proposals, followed by
- 2) Our recommendations for implementing County policy regarding non-motorized facilities,

## **Analysis of Appendix C / D in the 2024 draft Comprehensive Plan**

### **“TRANSPORTATION PROJECT LIST BY ALTERNATIVE”**

I will attempt to analyze these projects from the perspective of bike advocacy, and see to what extent the projects in Appendix C increase safety for bike users, and specifically how they improve safety on the 180 miles of numbered Bike Routes in the county’s 2013 and 2018 Non-motorized Plans.

The format the County chose for presenting information in Appendix C and D makes learning useful information extremely difficult, even with an intimate geographic knowledge of Kitsap County roads. Listing projects in a seemingly random order makes it difficult to find the description of a specific project shown as a number or map line in Appendix D maps. It is difficult to learn the location of any project in Appendix C because the maps in Appendix D are low resolution and lack street names.

I found I could understand the information better if I sorted *all* Appendix C projects into one list in their numerical order, which makes it easier to find project descriptions. The sorted data can be found on pages 5 and 6 of this document. Most numbered projects have identical descriptions in all three Alternatives, so the reason for three separate Alternatives isn’t clear to me.

By comparing information in Appendix C and D I was able to find what appears to be clerical mistakes. These are listed on page 7 to draw attention to them in order to improve the final Comp Plan. I found a few projects that are described slightly differently in the different alternatives, and a few project numbers are used twice for two different projects.

I created my sorted project list by first listing all projects in Alternative #2 - these projects are not shaded. I then added non-identical projects from Alternative #1 (shaded light blue) and non-identical projects from Alternative #3 (shaded light orange).

Specific recommendations are listed for 9 road projects on the following pages, providing information that supports our final general recommendation:

- Sidney Road
- Hansville Road
- Miller Bay Road
- Holly Road
- Clear Creek Road
- Silverdale Way
- Bethel Burley Road
- Chico Way
- Viking Way



## Sorted, Non-redundant List of Appendix C Projects.

11	N NATIONAL AVE	2	0.25 Pedestrian and intersection improvements and overlay	\$2,959,000.00
18	SIDNEY RD SW	2	0.50 Construct Paved Shoulders	\$915,000.00
23	VIKING WAY NW	1	2.25 Access management, LT lanes, Shared use path, intersection impr	\$14,000,000.00
24	OLD FRONTIER RD NW	3	1.75 WB climbing lane, sidewalk, bike lane or MUP, new RR	\$11,000,000.00
25	CENTRAL VALLEY ROAD NE	3	1.25 Sidewalks & bike lane	\$4,000,000.00
27	NW NEWBERRY HILL RD	3	0.25 SB/WB slip lane, add WB lane, add bike lane, sidewalks	\$8,000,000.00
28	PARKHURST LN NE	3	0.50 Sidewalk and bike lane, LT lanes	\$2,000,000.00
29	RIDGETOP BLVD NW	3	0.00 Widening and improvements	\$6,900,000.00
31	W BELFAIR VALLEY RD	2	0.75 Access control, bike lane & sidewalks	\$4,340,480.00
36	SE MULLENIX RD	2	2.25 Eastbound climbing lane and shoulder	\$8,680,980.00
72	NW HOLLY RD ALT 1	3	4.25 Access management, shoulders, left turn lanes	\$14,000,000.00
73	SEABECK HWY NW	3	3.00 Add shoulders, Access control, LT lanes	\$8,500,000.00
79	SIDNEY RD SW	2	2.75 Add shoulders, access management, LT lanes	\$7,500,000.00
80	MILLER BAY RD NE	1	4.00 Access management, LT lanes, shoulders or MUP	\$10,000,000.00
81	JACKSON AVE SE	2	1.00 Bike lane, sidewalk, median control, U Turns	\$5,000,000.00
82	VIKING WAY NW	1	1.75 Access control, left turn lanes, buffered sidepath or MUP	\$3,000,000.00
85	HANSVILLE RD NE	1	6.00 Access control, LT lanes, shared use path	\$6,000,000.00
86	SILVERDALE WAY NW	3	1.25 Access control, left turn lanes, sidewalk and bike lanes	\$6,000,000.00
89	NW BUCKLIN HILL RD	3	0.00 Sidewalk and bike lane and lane realignment	\$2,600,000.00
90	MILLER BAY RD NE	1	2.50 Access management, LT lanes, shoulders or multi-use path	\$8,000,000.00
91	NW ANDERSON HILL RD	3	0.50 Access management, shoulders & NM path, LT lanes	\$2,000,000.00
92	AUGUSTA AVE NE	1	0.50 Access management, sidewalk, bike lane	\$2,000,000.00
94	NE SATURN LN	3	1.00 Access management, LT lanes, sidewalk, bike lane	\$3,500,000.00
95	CHICO WAY NW	3	1.50 Access management, sidewalks/MUP, center curb, roundabouts	\$4,500,000.00
99	SEALTH LN NE	1	6.00 Access control, LT lanes, shared use path	\$6,000,000.00
100	NE WEST KINGSTON RD	1	0.75 Sidewalk and bike lane	\$1,500,000.00
101	NW HOLLY RD	3	5.50 Sidewalk and bike lane	\$1,100,000.00
102	NE PINECREST DR	3	2.00 Sidewalk and bike lane, LT lanes	\$2,500,000.00
200	SEABECK HOLLY RD NW	3	7.25 6 Ft Shoulder	\$9,444,065.29
200	NW ANDERSON HILL RD ALT 1	3	6.00 6 Ft Shoulder	\$7,709,412.61
202	BIG VALLEY RD NE	1	1.00 6 Ft Shoulder	\$1,396,396.06
203	PIONEER WAY NW	1	0.25 4 Ft Shoulder	\$265,739.74
204	INDIANOLA RD NE	1	1.00 6 Ft Shoulder	\$1,269,368.13
206	NE GUNDERSON RD	1	4.00 Lane Adjustments	\$10,453,153.70
208	NE LINCOLN RD	1	0.75 6 Ft Shoulder	\$1,128,763.46
209	NE TOTTEN RD ALT 3	1	6 Ft Shoulder	\$1,032,021.14
213	NW FINN HILL RD	1	0.25 6 Ft Shoulder	\$230,312.77
214	CLEAR CREEK RD NW	1	7.50 Sidewalk	\$25,013,738.74
215	NW WESTGATE RD	3	1.50 Lane Adjustments	\$4,041,200.44
217	CENTRAL VALLEY ROAD NW	1	4.50 6 Ft Shoulder	\$5,685,526.10

## Sorted, Non-redundant List of Appendix C Projects.

218	BROWNSVILLE HWY NE <b>ALT 3</b>	1	0.25 4 Ft Shoulder	\$156,053.57
219	NELS NELSON RD NW	3	0.75 4 Ft Shoulder	\$911,259.07
221	NW GREAVES WAY	3	0.00 Sidewalk	\$354,666.52
222	OLD FRONTIER RD NW	3	0.75 Sidewalk	\$2,808,723.91
223	KITSAP MALL BLVD NW	3	0.50 Lane Adjustments	\$1,248,805.21
224	NW ANDERSON HILL RD <b>ALT 3</b>	3	0.25 6 Ft Shoulder	\$254,806.86
225	SILVERDALE WAY NW	3	0.25 6 Ft Shoulder	\$383,329.48
226	NW BUCKLIN HILL RD	3	0.00 6 Ft Shoulder	\$102,813.83
227	NW NEWBERRY HILL RD	3	0.25 6 Ft Shoulder	\$415,908.45
228	NW SCHOLD PL	3	0.50 Lane Adjustments	\$1,503,094.26
230	NE NEWCASTLE CT	3	0.75 4 Ft Shoulder	\$796,927.09
233	CHICO WAY NW	3	1.50 6 Ft Shoulder	\$2,027,200.41
235	NORTHLAKE WAY NW	3	0.25 6 Ft Shoulder	\$356,221.15
236	CHICO WAY NW	3	0.00 6 Ft Shoulder	\$87,475.93
238	SEABECK HOLLY RD NW	3	0.25 6 Ft Shoulder	\$396,044.43
240	SW OLD CLIFTON RD	2	0.25 Lane Adjustments	\$616,140.55
241	SE SALMONBERRY RD	2	0.25 6 Ft Shoulder	\$281,873.70
242	SE MILE HILL DR	2	0.25 6 Ft Shoulder	\$287,573.56
243	LONG LAKE RD SE	2	0.75 6 Ft Shoulder	\$1,119,284.18
244	SW BERRY LAKE RD	2	3.25 Lane Adjustments	\$8,561,849.13
245	SUNNYSLOPE RD SW	2	2.25 Lane Adjustments	\$6,062,930.45
246	SW LAKE FLORA RD	2	7.25 Lane Adjustments	\$19,461,972.72
247	GLENWOOD RD SW	2	0.25 6 Ft Shoulder	\$174,420.59
248	SE LIDER RD	2	1.75 6 Ft Shoulder	\$2,325,283.81
249	BETHEL BURLEY RD SE	2	2.75 Sidewalk	\$8,883,152.71
250	PHILLIPS RD SE	2	4.00 Lane Adjustments	\$11,048,146.81
251	SE MULLENIX RD	2	1.25 Lane Adjustments	\$3,407,965.14
252	SE BURLEY OLALLA RD	2	2.25 Lane Adjustments	\$6,143,306.41
253	SIDNEY RD SW	2	1.25 4 Ft Shoulder	\$1,203,903.34
254	SE PINE RD	2	1.75 6 Ft Shoulder	\$2,235,880.62
255	BETHEL BURLEY RD SE	2	3.50 Lane Adjustments	\$9,634,741.08
256	SW LAKEWAY BLVD	2	1.50 Lane Adjustments	\$3,810,807.02
257	SIDNEY RD SW	2	0.50 Lane Adjustments	\$1,623,425.15
258	SW WILDWOOD RD <b>ALT 1</b>	2	1.00 Shoulder	\$1,156,528.97
259	GLENWOOD RD SW	2	0.75 6 Ft Shoulder	\$984,794.20
260	SW LAKE HELENA RD	2	2.50 Lane Adjustments	\$6,747,191.92
261	SW LAKE FLORA RD	2	9.25 Lane Adjustments	\$25,214,853.06
301	OLD MILITARY RD NE	3	0.25 4 Ft Shoulder	\$259,717.38
302	PERRY AVE	3	0.00 6 Ft Shoulder	\$157,462.01

## Possible Errors:

The project number “#24” is next to the line representing Anderson Hill Rd in the Appendix D map, but #24 is listed as Old Frontier in Appendix C.

The lines representing improvements on Old Frontier and Trigger in Appendix D have no project number next to them.

#28 is Riddell Rd in Alt 1, but listed as Parkhurst LN in Alt 2 and 3. The descriptions are the same. I cannot find a Parkhurst LN on a street map.

Project #85 (Hansville Rd) in Alt 3 is a **3.75 mi** shared use path with an estimated cost of \$6M. The same project #85 in Alt 1& 2 is a **6 mi** shared use path costing the same \$6M. Why isn't the cost estimate proportionately larger for the longer project, or are the project lengths in error?

#99 is a sidewalk/bike lane project shown as Suquamish Way in the Appendix D map, but it is called Sealth Lane (a small side street in Suquamish) in Appendix C.

#101 is Holly Rd in Alt 2&3, but #72 in Alt 1. #101 is Tracyton Blvd in Alt 1.

#200 is Holly-Seabeck Rd in Alt 2 and 3, but Anderson Hill Rd in Alt 1.

#221 Greaves Way is described as **0.0 miles of Sidewalk**, but there are already sidewalks on both sides of Greaves Way. Perhaps this refers to a very short segment of sidewalk, but this is unclear.

The Appendix D map has lines along Silverdale Way labeled #228, but the description of project #228 in Appendix C is called Schold Place, a short side road off of Silverdale Way. It is unclear which road the described improvements refer to.



It is unclear what the term “lane adjustments”, “access management”, and “intersection improvements” mean regarding bike safety or bike network connectivity, yet these are frequent (and expensive) project improvements mentioned throughout Appendix C. Transportation language can be confusing. Definitions would be helpful. Listing multiple objectives in a project description makes it unclear if they are optional components, or all will be used. Access to more detailed descriptions of each numbered project would be helpful to learn the location and length of improvements.

“Left turn lanes” are common in project descriptions, but they are vehicular amenities, and adding left turn pockets often occurs by using existing paved road shoulders, making non-motorized travel *more* dangerous. The left turn pocket added to Viking Way at Scandia Road is a good example of this. The turn pocket narrowed the wide paved shoulders to 18-24 inches, next to a ditch.

“6-foot paved shoulders”, are often mentioned in project descriptions, yet these are road improvements, not bike facilities. Shoulder improvements can be intermittent, or on only one side of a road. Road shoulders are used by motorists for parking and for passing. They are not bike facilities according to USDOT and WSDOT. PSRC is alone in defining a road shoulder as a “shared facility”, distinct and different from a “bike facility”. We support the highest level of safety attainable on any given road. Research shows that bike facilities (usually painted or protected bike lanes) are safer than paved shoulders.

**Bike** facilities are well-defined entities, have signed beginnings and endings, and are generally on both sides of a street. They create a designated space for bicycles - not to be shared with cars except in specific circumstances where speeds are slow and bikes are given priority. They are preferred for bike networks.

Below I explore 8 projects in Appendix C and D. The comments that follow are from a bike advocate concerned with bike network connectivity.

## Commentary on Nine Appendix C Projects Follow

#18 Sidney Rd 0.5 mi, Construct paved shoulders \$0.9M
--

**Recommendation:** We support wide 6-foot paved shoulders on Sidney Road from the Port Orchard City Limits to Linder Rd - a project on the County's Six-Year TIP for 14 years.

### Commentary:

Sidney Rd (County Bike Route 25) is an essential N-S connection between Gig Harbor and Port Orchard via Bethel-Burley Rd and Port Orchard's Pottery Avenue, where bike facilities leading to downtown Port Orchard are planned. This is, at least, a bike safety project, and should be labeled that way so implementation can be tracked.





**Recommendation:** We support buffered bike lanes on both sides of Hansville Rd from SR-104 to Hansville.  
**Commentary:**

Hansville Rd has 5- to 7-foot paved shoulders in the segment shown in Appendix D, but these safe shoulders end before reaching Hansville. Possibly the most scenic attraction in Kitsap County is at the end of Hansville Road, views from the lighthouse at Point No Point. Adding safe wide shoulders with a bike facility all the way to the town of Hansville would establish connectivity, the primary stated goal of every County non-motorized plan, but this is not in the scope of this project.

A shared use path for 6 miles would be an expensive mistake, yet it is listed in the project scope. Of course, the length and location of a SUP is not made clear in the project description. Buffered bike *and* pedestrian lanes similar to those on West Kingston Rd (which like Hansville Rd, has no sidewalks) would provide immediate safety improvements for cyclists (and the very few pedestrians who would walk this road) for a fraction of the cost.

Access Control and LT lanes are road improvements that may or may not improve bike safety. It is best to list road projects separately from bike/ped projects. A WSDOT “Bike Facility” is a well-defined entity that has a beginning and end. Describe (and build) that, and add vehicular road improvements as needed. If road projects and poorly-defined bike projects are combined in the scope, the road project will usually be prioritized - one reason so few bike facilities exist in Kitsap County.





West Kingston Road has wide paved shoulders and no sidewalks, just like Hansville Rd, Bethel-Burley Rd, Chico Way, Viking Way, and Silverdale Way north of Silverdale. It has bike lanes and a designated space for pedestrians near the shoulder of the road, making it a good prototype for cost effective conversion of roads with wide paved shoulders into a bike and pedestrian facility that designates a space on the side of the road for the exclusive use of bike users and pedestrians.

## West Kingston Rd





#80 Miller Bay Rd	4.0 mi,	Access management, shoulders, left turn lanes, or multi-use path	\$10M
#90 Miller Bay Rd	2.5 mi,	Access management, shoulders, left turn lanes, or multi-use path	\$8M

**Recommendation:** We support wide paved shoulders on Miller Bay Rd from SR-104 to Suquamish, on the County's Six-Year TIP from 2017 to 2019 and never built.

### Commentary:

Miller Bay Road (County Bike Route 51) has a 45 mph speed limit and no paved shoulders for most of its length. It is extremely hazardous for both cyclists and pedestrians.

The project description makes it appear road vehicular improvements are primary and a multi-use path (MUP) a possibility. MUPs are typically off-road, and should be in a project list devoted exclusively to non-motorized projects.

This description does not include the length and location of a north-south MUP, or describe the difference between a shared use path and a MUP. The recent County NSTO study (an east-west shared use path) suggests an extended MUP parallel to the road is not feasible.

Ambiguous descriptions of a bike/pedestrian facility combined with what are clearly vehicular road improvements is unacceptable given previous failures to create a safe place for bikes on Bike Route 51, linking Bainbridge Island and Suquamish to Kingston.





#72 NW Holly Rd	4.25 mi,	Access management, shoulders, left turn lanes	\$14M
#101 NW Holly Rd	5.5 mi,	Sidewalk and bike lane	\$1M

**Recommendation:** Holly Rd is one of the safest roads in Kitsap from a bicyclist's perspective, . A north-south bike facility spine crossing Kitsap, linking population centers to the future STO trail, should take priority over improvements on Holly.

### Commentary:

Project #101's scope includes building sidewalks and bike lanes, possibly for 5.5 miles in this location. \$1M can only pay for these improvements for a short distance, so, where along the stipulated 5.5 mi would it be? Why include 5.5 miles in the scope? This project description needs clarification.

Similar ambiguity is pervasive throughout Appendix C; look at the list. It is never clear that the described shared use path, bike lane, shoulder, or sidewalk will extend for the entire length of the project, and projects rarely connect destinations/ population centers.

We suggest listing non-motorized and road improvement projects separately. Bike facilities projects should describe the type of WSDOT-defined bike facility to be built, with a beginning and an end. Otherwise, there is no way to comment on how safe or useful proposed improvements are.

#72 appears to be an expensive vehicular-oriented road project of some kind. Left turn lanes are often added at the expense of existing shoulder width, making the road *more* dangerous for cyclists.





#214 Clear Creek Rd 7.5 mi, Sidewalks \$25M

**Recommendation:** Add 6-foot paved shoulders on Clear Creek Road from Mountain View Road to Lofall Rd.

### Commentary:

Clear Creek Road (County Bike Route 27) is frequently used by bicyclists. It is a relatively straight north-south connection between Silverdale and Kitsap Memorial Park / Port Gamble / the Hood Canal Bridge. The southern 2 miles of the road connects to bike lanes on Silverdale's Greaves Way and has wide paved shoulders. However, there are no paved shoulders in the location of this project where the speed limit is 50 mph.

There is no need for 7.5 miles of sidewalks, the only improvement in this project scope. There is great need for wide paved shoulders to make this road infinitely safer for vulnerable road users, cyclists and pedestrians.

Appendix C has more than 20 projects that scope 6-foot paved shoulders, but THIS is where they are feasible and one of the best places to put them.





#225 Silverdale Way .25 mi, 6-foot paved shoulders \$0.4M

**Recommendation:** Make Silverdale Way or an alternative route through Silverdale a safe, official bike facility.

**Commentary:**

Silverdale Way (in the middle of County Bike Route 31) is an extremely busy, congested, business corridor. It is between Chico Way and Silverdale Way north of Silverdale - both with wide rideable paved shoulders. An 11 mile north-south route for bikes on Route 31 is possible, IF a safe route for a bike facility through Silverdale can be found.

6-foot paved shoulders might accomplish this feat! The question is, how? “Bicycle Facilities” were part of the scope of a Six -Year TIP in 2018 and 2019, but were not included in the finished road overlay project. It was never clear how or where that bike facility would be built, just as it remains unclear how Appendix C project #225 is feasible.





#249 Bethel-Burley Rd (closer to Port Orchard)	2.75 mi,	Sidewalk	\$9.6M
#255 Bethel-Burley Rd (closer to Gig Harbor)	3.5 mi,	Lane Adjustments	\$8.9M

**Recommendation:** Make Bethel Burley a safe, marked route for bikes using wide paved shoulders and marking it as a designated bike and pedestrian corridor, just like West Kingston road.

### Commentary:

Bethel-Burley Road (County Bike Route 37) is an 8.2 mile nearly straight arterial with 4 to 5 foot paved shoulders. The speed limit is 45 mph. Pierce County plans to extend the Cushman Trail to Bethel-Burley Rd. The Cushman Trail connects to a large Pierce County bike network east of the Tacoma Narrows Bridge. The County designated this road part of the Leafline Trails 500 mile four-county network of safe multi-use facilities. Yet, no part of this “Bike Route” has a WSDOT-defined bike facility, such as a bike lane or buffered bike lane. If these projects are considered non-motorized improvements, that should be made much clearer, since lane adjustments and sidewalk additions can make bicycling less safe if the available space for cycling is narrowed or eliminated.





#95 Chico Way between Eldorado Blvd and Silverdale, 1.5 mi, “Access management, sidewalks / multi-use path, center curb, roundabouts”, \$4.5M  
#233 Chico Way between Eldorado Blvd and Erlands Point Rd 1.5 mi, “6-foot shoulder”, \$8.9M

**Recommendation:** Make Chico Way, all of it, a safe formal bike facility using its existing wide paved shoulders. Designate it a bike *and* pedestrian corridor, like West Kingston road.

**Commentary:**

Chico Way (County Bike Route 31) is a 4 mile suburban road with wide paved shoulders but no sidewalks. It is a heavily traveled bikeway between Bremerton and Silverdale. The speed limit is 40 mph. A bike facility is needed that accommodates both bike users and pedestrians for the entire length of Chico Way - like the bike facility on West Kingston Rd. Wide paved shoulders already exist along #233. The multiple, often ambiguous, improvements cited for #95 give no assurances that a connected continuous safe bike facility is under consideration - and this most assuredly is what is needed here. Chico Way will be an essential part of an eventual north-south bike facility between Gig Harbor and the Hood Canal Bridge.





#23 Viking Way, 2.25 mi, “Access management, LT Lanes, Shared use path, intersection improvements. \$14M  
#82 Viking Way, 1.75 mi, “Access control, LT lanes, buffered side path or Multi-use path”. \$3M

**Recommendation:** Make Viking Way, all of it, a safe, marked route for bikes using wide paved shoulders and marking it as a designated bike and pedestrian corridor, just like West Kingston road.

### Commentary:

Viking Way is the northern part of County Bike Route 31. It is a 4 mile suburban road with wide paved shoulders but no sidewalks. It is a heavily traveled bikeway between Silverdale and Poulsbo. The speed limit is 45 mph in places. A bike facility is needed that accommodates both bike users and pedestrians for the entire length of Viking Way. The multiple, often ambiguous, improvements cited for #23 and #85 give no assurances that a connected continuous safe bike facility is under consideration - and this most assuredly is what is needed here. Viking Way will be an essential part of an eventual north-south bike facility between Gig Harbor and the planned STO trail / Hood Canal Bridge.





## A Way Forward

There is a short essay at the end of KRRC's 2010 "Looking for Linkage" document titled: Bicycle Routes: Opportunity vs. Connectivity. The author suggests a means to achieve connectivity and cost efficiency:

- "Designate and prioritize a spine route through the County that connects centers of population and employment, that will serve both transportation and fitness/recreation needs."
- "Develop the overall plan in prioritized phases; begin with the spine and complete missing links. Grow the "spokes" of the bike route as a connected system that will grow in complexity."

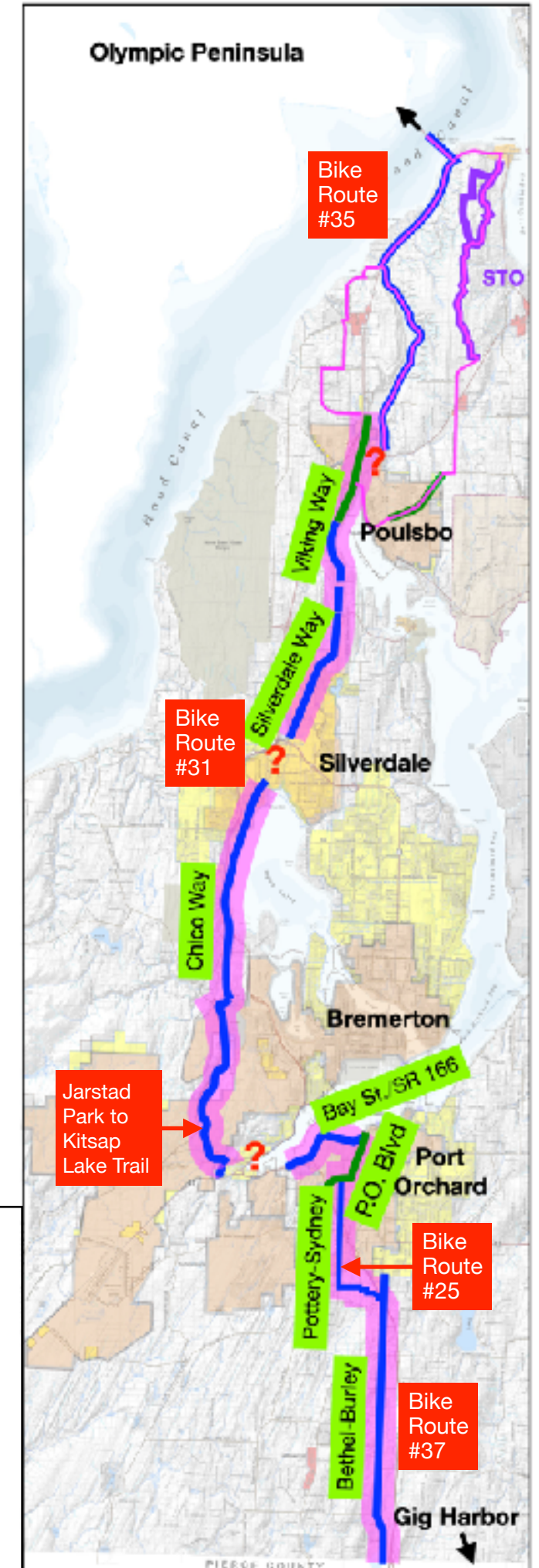
We recommend designing and building a **north-south bike facility connecting Gig Harbor's Cushman Trail to the Hood Canal Bridge** in phases. Such a facility would provide many recreational, transportation and economic benefits for Kitsap. The Jarstad Park to Kitsap Lake Trail is the crucial link, the means by which the County can create geographic and social equity by linking South Kitsap to Central and North Kitsap.

A concept for a north-south spine bike facility is shown at right. It would set a new safety standard for Kitsap that will encourage cross-connections. Chosen routes should be vetted for feasibility and likelihood to qualify for available grants. That appears to be a major failing of County planning documents such as the one reviewed here. We suggest a feasibility study for such a project be initiated by County Commissioners and awarded to a reputable transportation planning firm like Parametrix or Alta.

Planning should interface with Kitsap municipalities to integrate all existing and planned non-motorized facilities. Such a process would replicate the recently acquired RAISE grant for designing the North Kitsap Sound to Olympics Trail (STO).

### Legend

- Prospective North South Bike Facility
- Planned paths or roads with rideable shoulders that retain the potential of becoming bike facilities
- Existing bike Lanes or bike boulevard
- Possible routes to Hood Canalbridge





# Summary

A useful Active Transportation or Non-motorized transportation plan should limit itself to considerations regarding improvements that will benefit bike users and pedestrians, *from the perspective of bike users and pedestrians*. The jargon used in Appendix C and D is road centric, and project descriptions do not lend themselves to understanding how they will improve bike safety and connectivity.

The County should seek **an outside contractor like Alta** ( <https://altago.com/about/> ) to develop the next active transportation plan, an organization familiar with Level of Traffic Stress analysis, building bike networks, and using WSDOT-defined bike facilities as building blocks for the bike network.

This recommendation is not made lightly. Please review two documents I've written for you in support of this recommendation. The Dropbox links are below:

“20240305 County Bike Facilities Planning and Implementation” - an explanation of how the County NMP and TIP process delays implementation of bike facilities in Kitsap County:  
<https://www.dropbox.com/scl/fi/3bd5au5b5wo8atrsazlaw/20240305-County-Bike-Facilities-Planning-and-Implementation.pdf?rlkey=78l07hfnr23l04qj54f426cze&dl=0>

and,

“20240220 Is a 4-foot paved shoulder a useful definition of a bicycle facility?” - an explanation of why paved shoulders should not be categorized or treated as a bike facility.  
<https://www.dropbox.com/scl/fi/czjpfnu3kceq79gtclbvg/20240220-Is-a-4-foot-paved-shoulder-a-useful-definition-of-a-bicycle-facility.pdf?rlkey=tcc01atli40y6jp3lcrgdw9bu&dl=0>

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# CHARTWELL LAND COMPANY

9307 Bayshore Dr NW, Suite 307, Silverdale, WA 98383  
ChartwellLand.com | 360-646-3790 | Info@ChartwellLand.com

Dear Kitsap County Planning Commission,

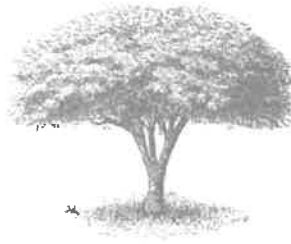
I am- writing to as a representative of Meadow View Kitsap LLC which has submitted reclassification request #13. The property is currently zoned Rural Residential and has requested to be brought into the Urban Growth Area and rezoned Urban Low.

## Reclamation and Restoration

In 2019 we submitted a comprehensive plan amendment, requesting conversation of the former Dickey Sand and Gravel Mine from Industrial property to Urban Low and Neighborhood Commercial. Through that process we committed to integrating affordable housing into the project. Through a robust Public/Private collaboration, we committed to developing 10% of the total project yield as affordable housing (per HUD standards). Some of the key concepts in this commitment are as follows: 10% of the total project as affordable, 10% of every phase as affordable, affordable units intermixed in the community (not isolated), max square footage of 1800 sqft for the affordable units, 100% paid by the developer with no subsidies. This unique approach has allowed us to find the nexus of affordable housing and market rate housing. Through the rezone incentive, we were able to modify our product mix to bring privately funded affordable housing to the market. Here we are 5 years later, and we now have a full approved community of 765 residential units with 76 of them being affordable units. We will be breaking ground on the land development in the coming weeks. A 140-acre abandoned gravel mine, will now be repurposed into a great neighborhood. This amazing story would have never been possible if it weren't for the County using a rezone process to incentivize affordable housing.

## Collaboration 2.0

We now have another opportunity to collaborate through the comprehensive plan process. Through this process, we propose creating affordable housing, missing middle housing, reclamation of Barker Creek, and utilizing Transfer of Development Rights (TDRs). Although site specific conditions are not common in a general comprehensive plan update, they are allowed. We believe this is an uncommon opportunity that should be thoroughly considered.



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## **Affordable Housing**

We blazed a trail with the Dickey Pit collaboration and suggest we utilize many of the same concepts. A summary of those concepts are as follows:

1. 10% of the total unit count shall be reserved for affordable housing as defined by the Department of Housing and Urban Development (HUD).
2. 10% of every phase shall be reserved for affordable housing.
3. Affordable housing can be for sale to a qualified buyer (similar to the Housing Kitsap Self Help program) or provided as rental units.
4. For-sale affordable units be no larger than 1800 square feet. This is to ensure once the unit has been sold to a qualified buyer, it still remains missing middle product for years to come.
5. For-rent product shall meet the affordability requirements for a minimum of 10 years.

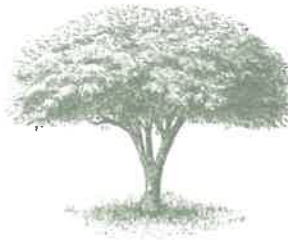
## **Missing Middle Housing**

In addition to the affordability requirement, we recommend a requirement for an additional 10% of the total unit count to be Missing Middle Housing. This includes townhouses, single family attached, duplexes, multifamily, cottage housing, and single family detached less than 1800 square feet.

## **Barker Creek Restoration**

The current site is part of the former Island Lake Bible Camp. Throughout the many decades of the camp history, there were countless changes to the site. Many of these changes created unintentional impacts to the headwaters of Barker Creek, which traverses the site North to South approximately 2400 feet. Some of the impacts are as follows: approximately 500' of the stream is piped, there are numerous stream crossings with substandard culverts, and much of the buffers have been reduced or completely moved. Through this rezone process, we recommend the project being conditioned to restore the Barker Creek corridor that runs through the property.





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## Transfer of Development Rights

The last recommendation we suggest be part of this process would be a transfer of development rights. We recommend that a TDR certificate be required for every unit not designated as Missing Middle or Affordable housing (80% of the total units). This will offset the change in the Rural/Urban by extinguishing building rights in the Rural area.

In summary, it is our hope that the Planning Commission will recommend this 75 acre site be included in the Preferred Alternative, subject to the conditions outlined in this letter.

Thank you for your consideration,

Levi Holmes  
Founder  
Chartwell Land Company



[Return to Comment Matrix](#)

My name is Carol Michel and I live in Bremerton.

I am 67 year old but when I was 13, my father who was a research scientist explained to me that burning fossil fuels would cause a greenhouse effect and heat up the earth – and we needed to do what we could to prevent this from happening. Everything he predicted has happened and is continuing to happen now.

One of the major drivers of climate change comes from animal agriculture – the growing of food to feed the animals and which we consume. When you factor in all the inputs to sustain this type of food production – it is responsible for a whopping 53% of the ~~CO2~~ <sup>Greenhouse</sup> emissions. Animals are very inefficient at creating food. They require large inputs of feed <sup>gas</sup> to get a small return. This inefficiency is also driving deforestation which exacerbates climate degradation. Even the lowest - emission animal products cause more climate change than plant based products.

As a horticulturist I have been aware of increasing challenges to our life sustaining crops due to soil erosion, changes in climate and increasing insect and disease infestations. Increasing temperatures and changes in water availability are putting our crops at risk. We need to make serious changes – and soon. As an individual, we can join the growing movement towards a more plant based diet. Eating lower on the food chain will reduce our carbon footprint considerably.

What can the county do to help?

1. Discourage further animal agriculture however it manifests itself and make a statement to this effect in the comp plan and other county documents.
2. Refuse any new Open Space applications that are based on animal agriculture.
3. Provide incentives for any animal-based open space operation to discontinue and grow either crops for people or plant trees to sequester carbon from the atmosphere.

We can't address a crisis without treating it like one. Thank you.

[Return to Comment Matrix](#)

Submitted BY  
CHRISTIE SCHULTZ

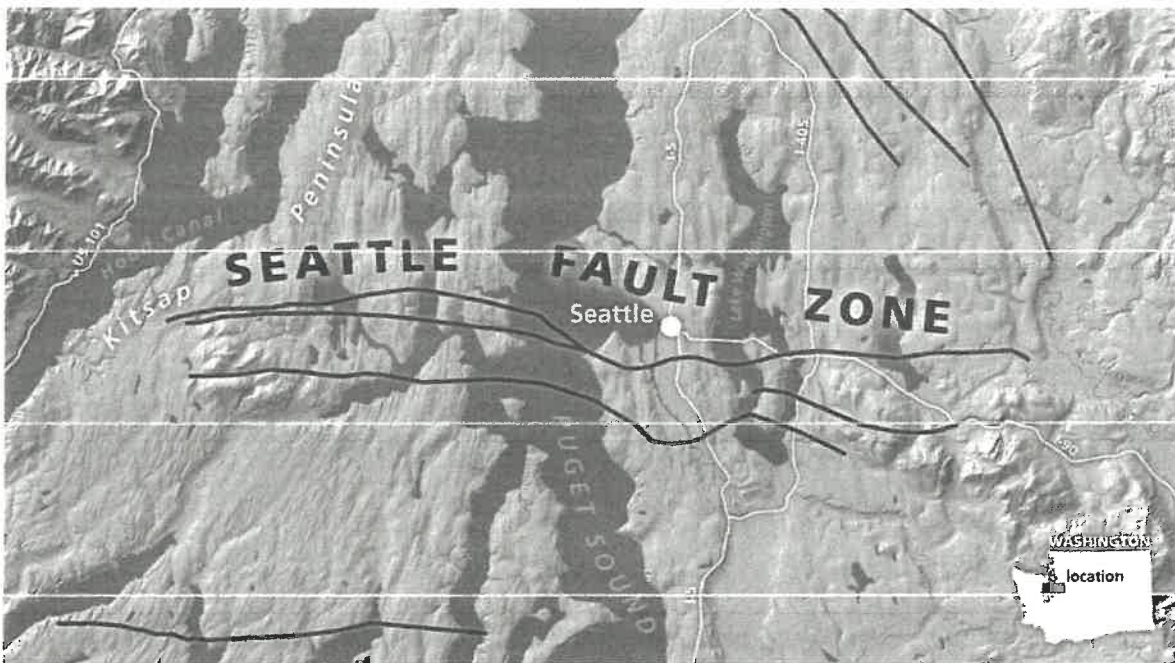
MENU

## SEATTLE FAULT MAY HAVE ORIGINS IN AN ANCIENT TEAR IN THE CONTINENT

**MAGNETIC DATA SUGGEST THE HAZARDOUS SEATTLE FAULT ZONE DEVELOPED AS THE EDGE OF THE CONTINENT TORE ITSELF IN TWO MORE THAN 50 MILLION YEARS AGO, PROVIDING A POSSIBLE NEW ORIGIN STORY FOR THE FAULT**

6 February 2024

Joint Release



**([https://news.agu.org/files/2024/02/seattle\\_fault\\_zone\\_final\\_for\\_agu1-scaled.jpg](https://news.agu.org/files/2024/02/seattle_fault_zone_final_for_agu1-scaled.jpg))**

The modern Seattle fault zone cuts directly through the densely populated Puget lowlands, including Seattle and its metro area. Fifty million years ago, the continent tore in two here, setting the geologic stage for the modern faults, according to a new Tectonics study. Credit: Washington Geological Survey.

### AGU press contact:

Rebecca Dzombak, [news@agu.org](mailto:news@agu.org) (<mailto:news@agu.org>) (UTC-5 hours)

### Contact information for the researchers:

Lauren Padgett, Washington State Department of Natural Resources communications,

[lauren.padgett@dnr.wa.gov](mailto:lauren.padgett@dnr.wa.gov) (<mailto:lauren.padgett@dnr.wa.gov>) (UTC-8 hours)

Megan Anderson, Washington Geological Survey, [megan.anderson@dnr.wa.gov](mailto:megan.anderson@dnr.wa.gov)

(<mailto:megan.anderson@dnr.wa.gov>) (UTC-8 hours)

*Please direct interview requests to Megan and cc Lauren.*



WASHINGTON — The Seattle fault zone is a network of shallow faults slicing through the lowlands of Puget Sound, threatening to create damaging earthquakes for the **more than four million** (<https://censusreporter.org/profiles/31000US42660-seattle-tacoma-bellevue-wa-metro-area/>) people who live there. A new origin story, proposed in **a new study** (<https://agupubs.onlinelibrary.wiley.com/doi/10.1029/2022TC007720>), could explain the fault system's earliest history and help scientists improve hazard modeling for the densely populated region. The study was published in *Tectonics*, AGU's journal for research exploring the evolution, structure and change of Earth's crust and upper mantle.

The Seattle fault is active today because of forces exerted on the region from ongoing tectonic deformation both to the west and south, but that was not always the case. Washington in the Eocene looked different from today, with a coastline well east of where Seattle sits today and a chain of volcanic islands dotting the horizon offshore.

The study suggests that around 55 million years ago, that island chain was pulled toward the continent. As it ran into the North American plate, part of it went up and over the crust while the rest was sucked under it. Between these two parts, the crust would have been under great strain and torn. That ancient tear zone set the geologic stage for the modern Seattle fault, the study authors posit.

"It was a total surprise," said Megan Anderson, a geophysicist with the Washington Geological Survey and lead author of the study. "It wasn't something we were going for originally, but our results predict a major ancient fault where the Seattle fault is today."

#### A MASSIVE MYSTERY

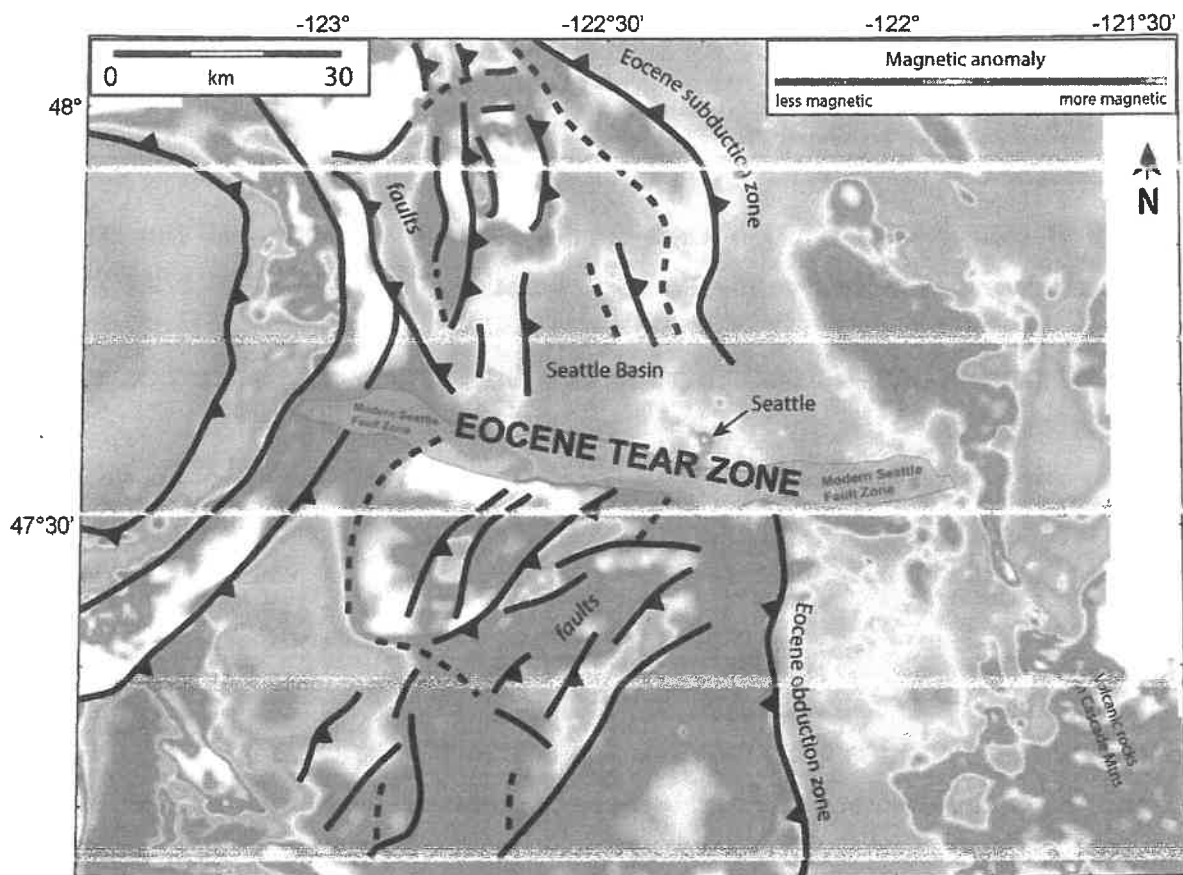
The Pacific Northwest lies just inland from the Cascadia subduction zone, where dense oceanic crust gets pulled under the continent. In 1700, a roughly 1000-kilometer (620-mile) rupture of the subduction zone created a massive quake between magnitude 8.7 and 9.2; smaller quakes shook the region throughout the 1900s and, most recently, during the **2001 Nisqually earthquake** (<https://www.seattletimes.com/seattle-news/science/20-years-after-the-nisqually-earthquake-are-we-better-prepared-for-the-big-one/>). The Seattle fault **ruptured notably in 923-924 AD** (<https://www.science.org/doi/full/10.1126/sciadv.adh4973>), based on local Indigenous oral traditions and geologic evidence along the Puget Sound shoreline.

Despite the region's seismic activity, scientists didn't begin to study the Seattle fault zone in earnest until the 1990s.

"There's a lot more uncertainty about the Seattle fault than, for example, the San Andreas fault," Anderson said. "The Seattle fault could generate something like a magnitude 7.2 earthquake, and we want to be prepared for it. There's still a lot to learn so that engineering geologists can do better simulations for earthquakes and understand the potential risks to our communities."

Previous work to determine the geometry of the Seattle fault at depth relied primarily on seismic data, which are sound waves traveling through and being reflected by underground layers of rock. The data revealed faults and geologic structures that seismologists and geologists interpreted differently. They knew the region hosted a major fault zone, but scientists had proposed different ways parts of the fault are connected, how deep it extends, and how steeply it cuts through the bedrock.

Anderson and her co-authors set out to test the existing hypotheses of the fault zone's geometry by mapping kilometers-deep bedrock across western Washington and building a more complete picture of the region's geologic structure. Gravity and magnetic fields vary across Earth's surface based on rocks' density and composition, so Anderson compiled those data for western Washington and paired them with seismic data. The researchers also collected rock samples from geologic formations that correspond to different parts of the ancient fault and mountain system.



(<https://news.agu.org/files/2024/02/magnetic-map.png>)

Aerially collected magnetic data (background colors) of western Washington reveal that faults (black lines) on either side of the modern Seattle fault are oriented in different directions, suggesting a significant disconnect between the north and south. A massive tear between subducting and obducting (sinking and accumulating) material could have formed from the strain, authors of a new Tectonics study posit. Credit: modified from Anderson et al./Tectonics

The researchers used computer models to see which, if any, of the hypotheses matched up with the gravity, magnetic and seismic data. The gravity data did not show a complex pattern, but the magnetic data revealed a key secret seismic data missed: deep in the crust, the bedrock consistently alternates

between being more and less magnetic, suggesting slanted layers of changing rock type. And in map view, features on either side of the Seattle fault zone angle away from each other; north of the Seattle fault zone, structures are angled north-northwest, while in the south, they're oriented north-northeast.

Those wonky orientations gave Anderson pause; they hinted at an ancient mountain range, but to check that, Anderson needed to match up the map-view data with deeper rocks. To connect the map view with known, deeper bedrock geology, Anderson modeled a vertical profile of rocks underground and found some of those structures dip at different orientations underground, too.

"These are all very different orientations," Anderson said. "It's very hard to do that unless there's a place where the structures get disconnected from each other and then restart."

Anderson had stumbled upon a new possible explanation for the Seattle fault zone's early history and why it's reactivated today.

#### A TEAR IN THE CRUSTAL CONTINUUM

The data suggested that about 55 million years ago, as the subduction zone pulled in a string of oceanic islands, the northern half of the island chain was subducted, but the southern half was added to the top of the crust, or obducted. Over a couple million years, as the islands were obducted, they crumpled into a fold-and-thrust mountain belt with topography similar to the Blue Ridge Mountains of Appalachia today.

The zone where the islands switched from being subducted to being accreted would have been under incredible strain and been ripped apart.

"It would have been this slow, ongoing tear, almost like the crust unzipping itself," Anderson said. "As this progressed, the tear fault got longer and longer."

And that "torn" region overlies perfectly with the modern Seattle fault zone.

The intense tearing would have stopped after the islands were crunched into the continent, but the damage was done. The zone of intense tearing created fragmented, weakened crust, setting the geologic stage for the modern Seattle fault zone.

Beyond offering a possible explanation for why the fault zone exists, the study's results about the geometry of Washington's more ancient faults and geologic structures provide valuable details about the bedrock under and within the Seattle basin. This basin is filled with kilometers of looser sedimentary rock which make seismic ground shaking stronger, and the new data can help scientists make more accurate models of future ground shaking in the area.

Anderson is excited to use her findings to study western Washington's active faults next.



“This buried tectonic story was so much fun to discover, and now it will provide a great basis for getting back to answering our original questions about active fault geometry for the Seattle fault and other faults in western Washington,” Anderson said.

#

#### NOTES FOR JOURNALISTS:

This study is published in *Tectonics*, with free access provided for 30 days after publication. Neither the study nor this press release is under embargo. **[View and download a pdf of the study here \(https://agupubs.onlinelibrary.wiley.com/doi/10.1029/2022TC007720\)](https://agupubs.onlinelibrary.wiley.com/doi/10.1029/2022TC007720)**.

See the WA Department of Natural Resources press release **[here \(https://www.dnr.wa.gov/news/study-shows-seattle-fault-may-have-origins-ancient-tear-continent\)](https://www.dnr.wa.gov/news/study-shows-seattle-fault-may-have-origins-ancient-tear-continent)**.

#### PAPER TITLE:

“Deep structure of Siletzia in the Puget Lowland: Imaging an obducted plateau and accretionary thrust belt with potential fields”

#### AUTHORS:

Megan L. Anderson (corresponding author), Washington Geological Survey, Olympia, WA, USA  
Richard J. Blakeley, Ray E. Wells, USGS, Portland, OR, USA  
Joe D. Dragovich, Dragovich Geo-Consulting, Lacey, WA, USA

*AGU ([www.agu.org](https://www.agu.org) (<https://www.agu.org/>)) is a global community supporting more than half a million advocates and professionals in Earth and space sciences. Through broad and inclusive partnerships, AGU aims to advance discovery and solution science that accelerate knowledge and create solutions that are ethical, unbiased and respectful of communities and their values. Our programs include serving as a scholarly publisher, convening virtual and in-person events and providing career support. We live our values in everything we do, such as our net zero energy renovated building in Washington, D.C. and our Ethics and Equity Center, which fosters a diverse and inclusive geoscience community to ensure responsible conduct.*#

Tags: **[Earthquakes \(https://news.agu.org/tag/earthquakes/\)](https://news.agu.org/tag/earthquakes/)**, **[Tectonics \(https://news.agu.org/tag/tectonics/\)](https://news.agu.org/tag/tectonics/)**

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Epic blizzard hits California

Snowpack will see a boost

The \$16-billion water t

CALIFORNIA

## A chunk of Rancho Palos Verdes is sliding into the sea. Can the city stop it?



The city of Rancho Palos Verdes is mounting a plan to slow a landslide that has been shifting Portuguese Bend for seven decades. (Robert Gauthier / Los Angeles Times)

BY JACK FLEMMING | STAFF WRITER

MARCH 6, 2023 5 AM PT

A drive along the ocean on the Palos Verdes Peninsula is Southern California at its finest. Sunlight dances on the water. Coves are pristine, unsullied by development. Catalina Island appears so near you can almost spot the bison.



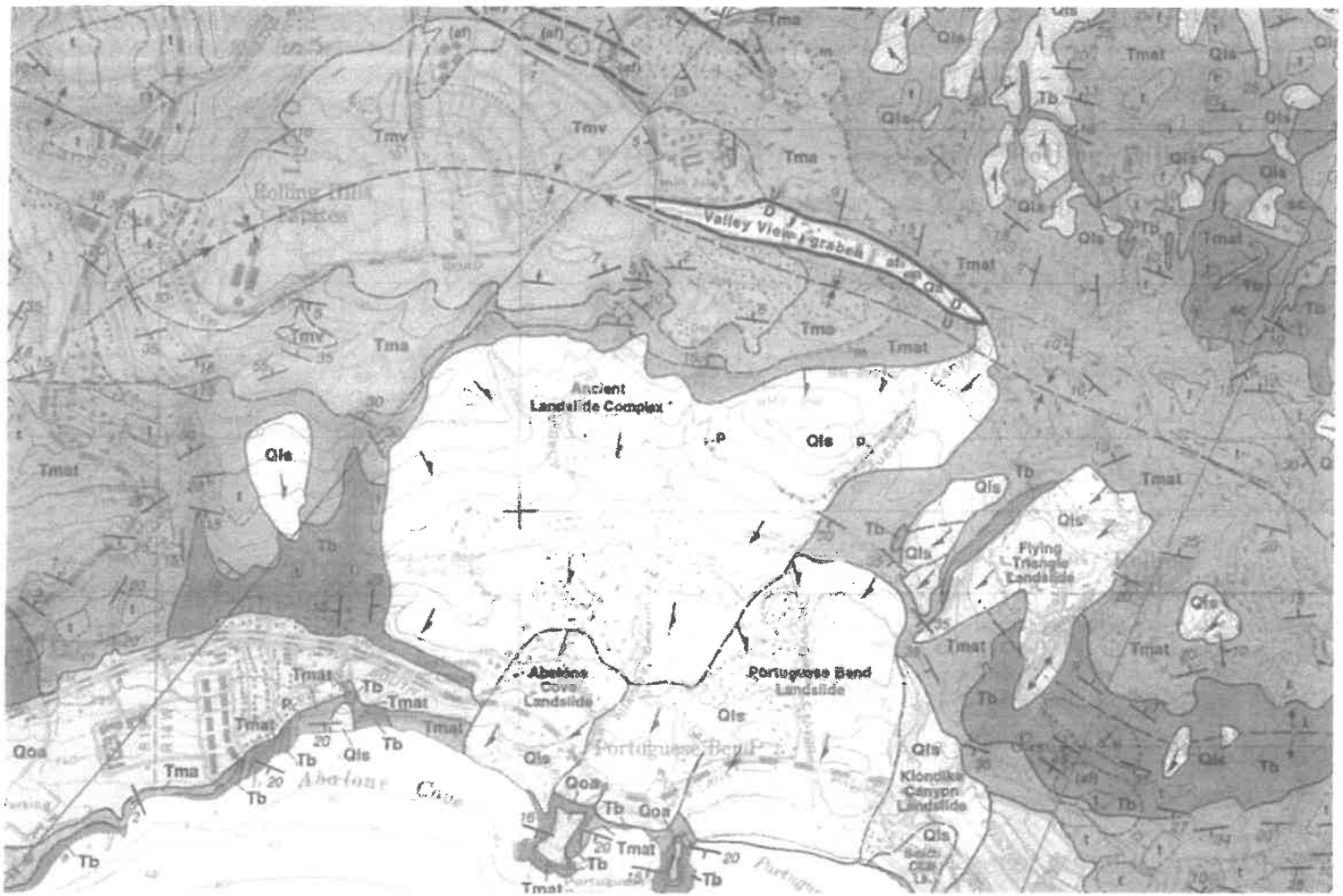
Look a bit closer, though, and you'll see signs of a disaster waiting to happen.

An above-ground sewage pipe snakes along the road. The pavement on Palos Verdes Drive South is rutted and warped, jutting up and down like an asphalt roller coaster. The hills are strewn with houses on makeshift foundations, perched on haphazard stilts and shipping containers.

The problem: A dormant landslide complex that shaped the south side of the Palos Verdes Peninsula for hundreds of thousands of years was reactivated 67 years ago, and it's threatening to destroy homes and infrastructure.

The solution: a \$25-million series of wells that will suck water out of the ground and spit it into the ocean, effectively drying up the lubricated landscape enough to stop the land from sliding.

Palos Verdes Peninsula has long been prone to landslides, and the most dramatic one is affecting Portuguese Bend, an area named after a Portuguese whaling operation, now known for its natural beauty and native vegetation. The geological phenomenon has hit a 240-acre area hard over the last seven decades, causing fissures to open in the earth and homes to strain, buckle and drift, sometimes outright wandering onto adjacent properties.



A map shows the ancient landslide complex affecting Rancho Palos Verdes. (Rancho Palos Verdes)

City officials are mounting a plan to mitigate the landslide before it's too late.

“Something catastrophic is imminent,” said Ara Mihranian, a city planner. Since being named city manager in 2019, he has made slowing the landslide a primary focus.

“Doing nothing is not an option.”

## How did this happen?

The Portuguese Bend landslide was triggered in the summer of 1956 — nearly two decades before Rancho Palos Verdes became a city — when a Los Angeles County road crew was constructing an extension of Crenshaw Boulevard that would run from Crest Road to Palos Verdes Drive South.

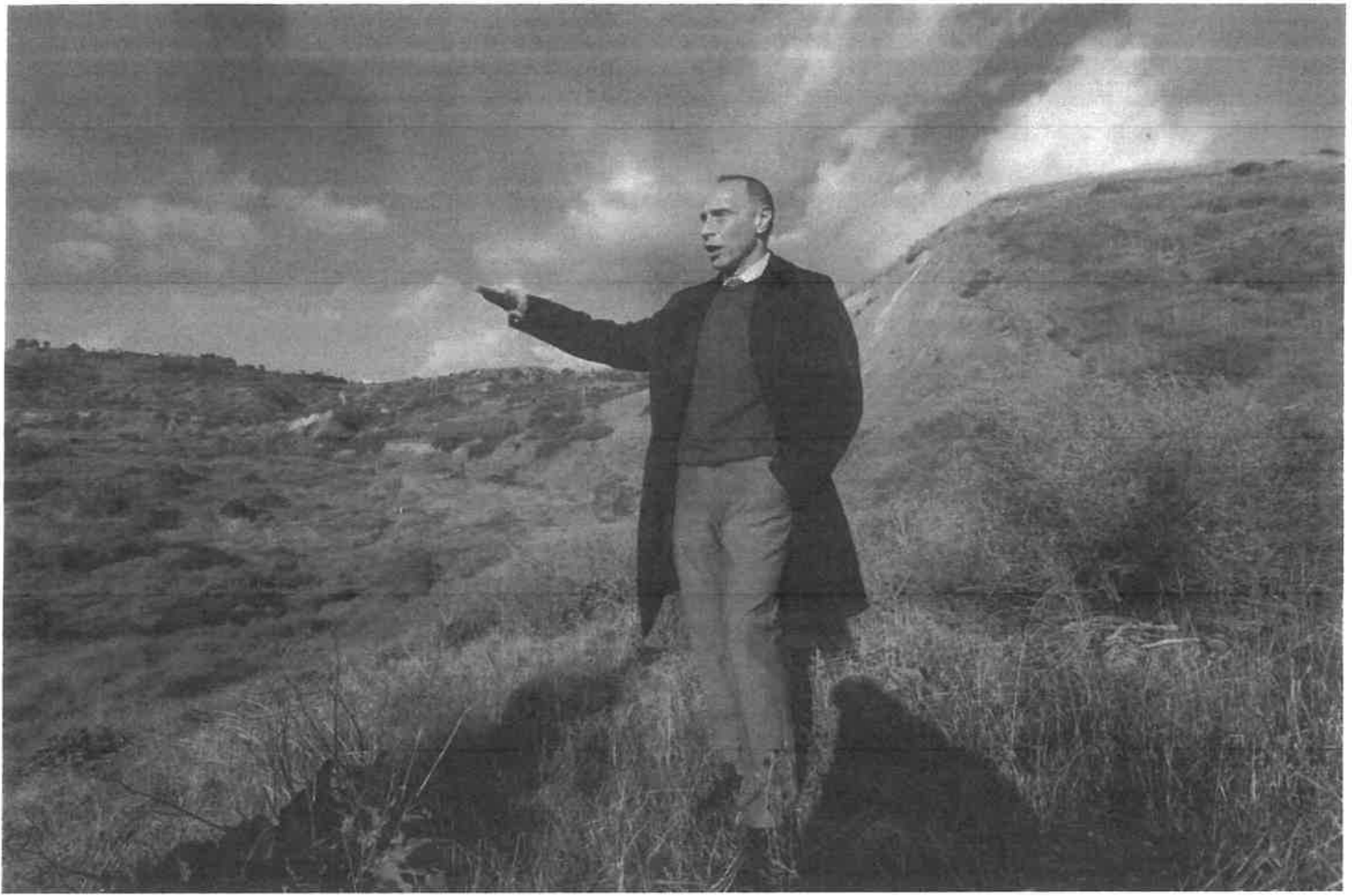
The crew dug up thousands of tons of dirt for the project and dropped it on top of the ancient landslide zone, which hadn't moved in 4,800 years. The extension was never completed, but the weight and movement of the dirt shifted the balance of the earth enough to reactivate the slide, sending the land into a slow-motion descent toward the sea.

The slide did the majority of its damage just a few months after it began. The primary victim: Portuguese Bend Club, a beachfront paradise envisioned by Kelvin Vanderlip, son of Frank Vanderlip, who helped develop the Palos Verdes Peninsula in the 1920s.

The coastal complex included a clubhouse, pool, pier and hundreds of homes that occupied the hills above. A few months after the landslide started, it slowly tore up 130 of the homes. The pool was damaged, and the clubhouse was deemed unsafe, closing two years later, according to the Daily Breeze.

The land moves sometimes horizontally, sometimes vertically. Sometimes inches, sometimes feet. Mihranian said it moves at a pace of roughly eight feet, in a southwesterly direction, per year. Over the last 15 years, sections of land have moved anywhere from 100 to 225 feet horizontally and dropped eight to 18 feet vertically.





Rancho Palos Verdes City Manager Ara Mihranian in the Portuguese Bend nature reserve. (Carolyn Cole / Los Angeles Times)

Landslides are common, but what makes Portuguese Bend's extraordinary is how slowly but surely it persists — the Aesop tortoise of natural disasters. Scientists and geologists have flocked to the area over the years to study the slide because of its rare combination of size and scope.

Thomas Oommen, professor of geological sciences at Michigan Technological University, said it's an interesting case study because there are only a few landslides with such significant movement every year. What distinguishes Portuguese Bend is that the slope has not failed catastrophically — yet — and the humans atop are largely staying put, riding the slow-moving land for as long as they can.

## The landslide today

In recent years, the landslide's harm has been more incremental than the initial destruction in 1956. The most noticeable damage is dealt to Palos Verdes Drive South — the road that winds along the coastal cliffs — warping it into a crooked, hilly mess with dips that make your stomach jump. The city has to send a crew once a month to fill cracks, maintenance that costs roughly \$1 million per year.



Sewage pipes run above ground along Palos Verdes Drive South at Portuguese Bend, where a stretch of roadway is uneven and erratic because of land movement on the coastline. (Luis Sinco / Los Angeles Times)

The road is a high-traffic thoroughfare that connects the southern end of the peninsula to the rest of L.A. County, and if the landslide ever severs it — like the one that fissured Paseo del Mar in San Pedro in 2011, sending sections into the sea — it will create a 15-mile detour and cut off a major evacuation route from the fire-prone hills.

ADVERTISEMENT

“There’s a real risk here,” Oommen said. “If no mitigation measures are taken, it could lead to the destruction of that road.”

Oommen, co-author of [a 2019 report](#) on the landslide, said several factors could cause a complete failure of the hillside. An earthquake would be the obvious culprit, but even a major rainstorm could trigger it.

The slide shifts the land so much that most utilities can’t be buried underground, so the city has installed an eyesore: an above-ground sewage line that runs along the side of the road. It’s rigged with flexible pipes that can move along with the land. If the landslide ever ruptures the line and the city is delayed in shutting down the valves, it would dump raw sewage onto the beaches, coves and tide pools, said Mihranian.



CALIFORNIA

**Column: How I finally learned to care about Orange County’s crumbling coastline**

March 2, 2023

The homes along and above the road, meanwhile, suffer cracked walls and foundations, busted pipes and crooked windows and door frames. One ranch in the Seaview neighborhood has a roof that’s slowly caving in. Another, in the gated community of Portuguese Bend, is perched on eight feet of timber cribbing, a makeshift remedy that essentially suspends the property on supersize Jenga blocks.



Kyle Tourje, a structural assessor with Alpha Structural, works on homes around Portuguese Bend and is shocked by the solutions people come up with.

"It's so Mickey Mouse, so substandard," he said. "You have a luxury community with world-class golf courses and amazing views of the ocean, but some homeowners are literally living in Third World conditions."



Some houses in Portuguese Bend are propped up on timber cribbing to keep the foundation steady with the shifting land.  
(Carolyn Cole / Los Angeles Times)

Claudia Gutierrez, a longtime resident and director of the Portuguese Bend Community Assn., said the shifting has cracked her home's concrete foundation and interior walls and jammed windows and doors. Kent Attridge, another resident, recently had a water pipe break.

Since the subterranean land is in a state of flux, homeowners can't build a deep foundation or it'll get sheared apart by the layers of movement. So homes sit on top of the land, bobbing on the surface, wherever it goes.

Residents are unable to make permanent repairs because the city has placed a building moratorium in the active landslide zone. On many calls, Tourje's hands are tied.

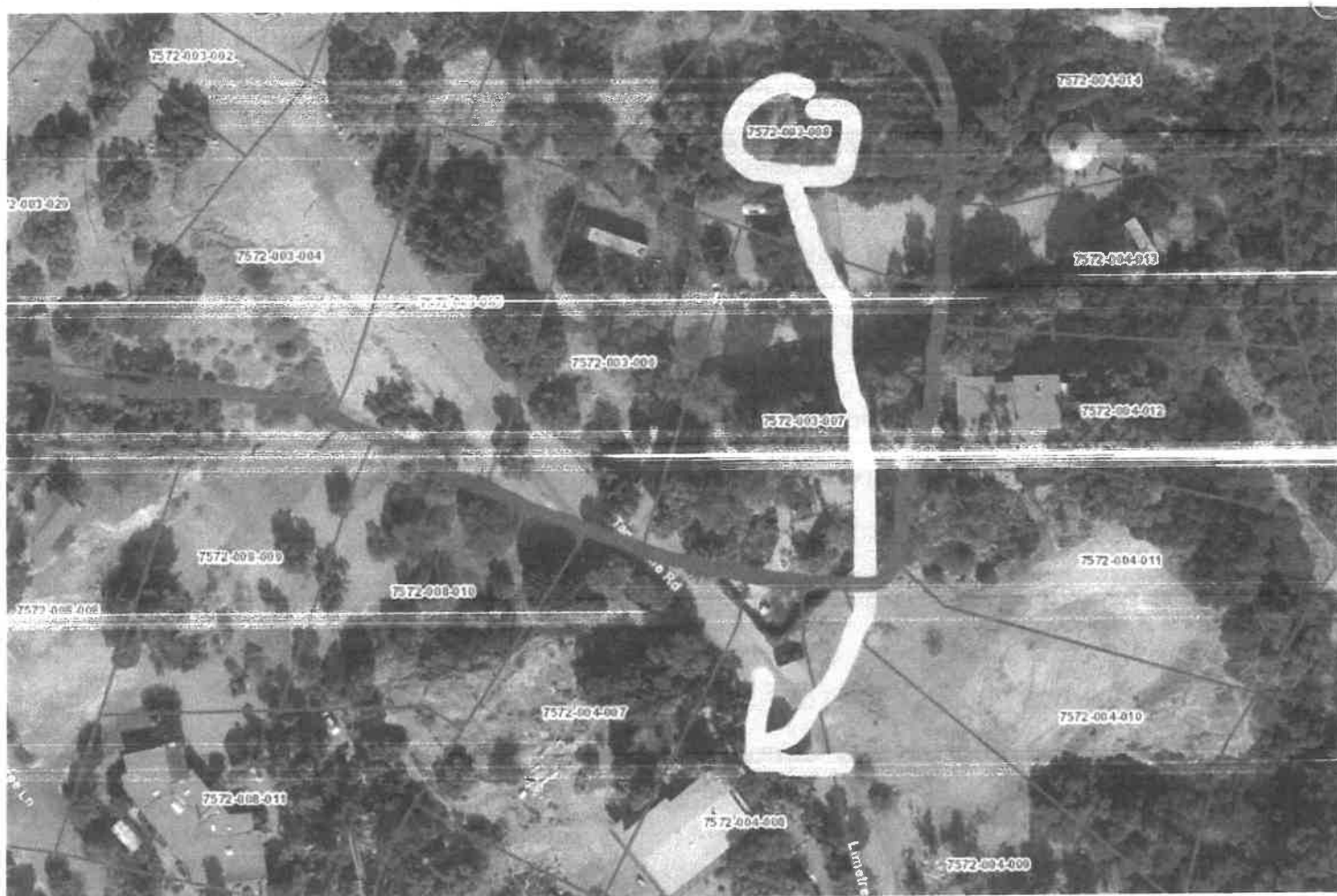
"This is right up our alley of work, but the moratorium forbids us from doing anything," he said. "So you get homeowners supporting their properties with pipe jacks or steel beams, because they're tired of getting vertigo from the inside of their house being so crooked."

Locals who have rigged DIY fixes suffer in silence, keeping it quiet from city officials and journalists for fear of losing their homeowners insurance.

## Assessing a mobile, er, moving home

It's one thing for the landslide to damage a house, but what happens when it moves the home entirely off of its property? That's the conundrum L.A. County Assessor Jeffrey Prang has been tasked with solving.

"When we assess property parcels, the legal description is based on fixed points of reference that are stationary. But in Portuguese Bend, we have property parcels that remain in the same place [on the map], while the house has moved off that fixed parcel onto someone else's property," Prang said. "There's no precedent for this."



Aerial imagery shows how far one house has moved from its original parcel. (Jeffrey Prang)

Aerial imagery shows how significant the movement has been, with homes shifting over multiple lots and roads in completely different places. There's no legal basis for such a situation, so Prang has relied on judgment and departmental policy. For now, he's treating each home as if it hasn't moved.

That system is working, but the landslide is making the real estate market much more difficult to navigate.

"How do you sell a property and get title insurance if you can't guarantee the land that you're on is yours? Their ability to sell is compromised because of the movement," he said.

One resident tried to take advantage of the crisis and scheme a way into a free house by buying up vacant land and trying to claim that a home had moved onto it. The same



buyer even tried, unsuccessfully, to get a longtime homeowner evicted, claiming that the house was now technically on his land, Prang said.

Lawsuits have been filed over property lines and trespassing allegations.

Much of the confusion is because the city of Rancho Palos Verdes in the early 2000s adopted a Geographical Information System, or GIS, which maps property lines over aerial imagery. It's a common system but one that doesn't account for land that's moving. The map even has a disclaimer on the city's website that says property lines may not be accurate in the landslide zones.

Portuguese Bend residents generally favor a system more in tune with metes and bounds, a mapping method that uses physical landmarks such as trees, walls and roads to measure parcels. Gutierrez describes it as common sense.

"There are 96 properties on the east side of Portuguese Bend. If you go by GIS mapping, every single one is incorrect," she said. "So then you have someone buying a piece of empty land for \$38,000, realizing there's technically a house on it, according to GIS, and then claiming it's worth \$1 million."



CALIFORNIA

**How an 'ancient landslide' keeps threatening a railroad, homes in San Clemente**

Sept. 27, 2022

Disputes often break out between neighbors about who owns what. Cars and RVs are parked straddling property lines. In one case, a resident cut down someone's wood fence over a property dispute.

Sometimes, the confusion can be dangerous.

Ben Zask, who also serves in the community association, said that when an ambulance was looking for a senior citizen using the GIS map, it went to the wrong address twice before finding the right house.

“A 10-minute delay in an emergency like that can be costly,” Zask said.

## The plan to slow the slide

The science behind the landslide is fairly straightforward: Rainwater and irrigation water are absorbed into a particularly absorbent layer of earth.

El Hachemi Bouali, assistant professor of geosciences at Nevada State College, said it all comes down to clay — bentonite and montmorillonite, to be specific. The clay, upon which the main body of the slide sits, swells and becomes soft and slick when mixed with water.

So even though Portuguese Bend's slope dips toward the ocean at an angle of roughly 5 degrees — less than the 15- to 20-degree slopes of typical landslide areas — the clay becomes slippery enough for the land to ride downward with the force of gravity, as if it were on an icy driveway.

“Everyone looks forward to rain because we're in a drought. But for a community like ours, we cringe, because we know it's going to accelerate the landslide at some point,” Mihranian said.



The city is planning to install a series of horizontal dewatering wells that will suck water out of the ground, drying the lubricated clay that's causing the slide. (Robert Gauthier / Los Angeles Times)

In 2017, the city of Rancho Palos Verdes started exploring efforts for long-term stabilization, forming a subcommittee, holding community meetings and hiring a consultant to find the optimal solution. In February, it released a draft of the environmental impact report laying out a possible plan.

The plan hinges on two tactics: stopping rain from getting into the ground and extracting the water that's already there.

To do this, the city is proposing a three-pronged approach: infilling fissures in the earth that let in rain, creating a surface drainage system to send rainwater into the ocean and installing horizontal dewatering wells to suck water out of the ground.



CALIFORNIA

**California approaching a record snow year as yet another storm hits**

Feb. 27, 2023



The plan is based on measures taken in Abalone Cove, a nearby landslide complex that, thanks to dewatering wells, has slowed land movement to a much more manageable one to two inches per year.

“It’s absolutely a viable solution,” said Tourje, who often installs similar dewatering systems when fixing landslide repair. “It’s a lot of work, but it’s the only feasible way to mitigate this. You can’t beat this, only slow it down.”

The plan, which is open for public review and will be the focus of a March 21 City Council meeting, will require a budget of \$25 million for the wells and \$8 million for fissure infilling and surface water drainage systems. Although the city is known to be generally affluent, it doesn’t have the tax base to handle such projects on its own.

As a result, the city has applied for \$23.3 million from the Federal Emergency Management Agency through its Building Resilient Infrastructure and Communities grant funding program, and Mihranian is doing everything in his power to secure the money.

“These grants are designed to put measures in place to prevent a catastrophe, and that’s what we’re trying to do here,” he said.

He’s hoping to get the remaining \$10 million needed for the project from the county and state, claiming that the crisis isn’t just a local issue but regional, since the landslide poses risks to county roads and beaches.

“There’s an imminent threat to the environment. Homes are in jeopardy. Lives are in jeopardy,” he said.

If all goes according to plan, the city hopes to start installing the wells in 2024, a process that would take roughly a year.

Most residents are staying put.



Peter James Cavanna is a resident of the private community of Portuguese Bend. Despite the shifting foundation of his home, he does not intend to leave. (Carolyn Cole / Los Angeles Times)

“It’s a testament to the people here. Most situations like this are declared a disaster,” Gutierrez said. “But we’re resilient. We’ve learned how to adapt.”

*Times staff writer Hailey Branson-Potts contributed to this report.*

#### MORE TO READ

Opinion: A San Francisco carve out could wreck California’s landmark coastal protections

Feb. 26, 2024



## As land slides alarmingly, Rancho Palos Verdes is seeking state and federal emergency declarations

Feb. 20, 2024



## Winter rains fuel 'unprecedented' acceleration, expansion of landslides in Rancho Palos Verdes

Feb. 18, 2024



Jack Flemming

Jack Flemming covers luxury real estate for the Los Angeles Times. A Midwestern boy at heart, he was raised in St. Louis and studied journalism at the University of Missouri. Before joining The Times as an intern in 2017, he wrote for the Columbia Missourian and Politico Europe.

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3/5/2024

To Whom it May Concern:

We as the owners of the following parcel in the 2024 South Kitsap Comp Plan update, fully agree with and support the rezone of this parcel from Rural to an Urban Low Zoning. The Parcel is surrounded by high density residential new development to the North, South, and East and the new McCormick Village Dr fronts on our parcel's eastern boundary. Also the new paved McCormick Village Dr has all utilities available in the Street. The proposed rezone supports the best use for this parcel of land. Not only for us as owners of the property, but for the surrounding neighborhoods, the rezone of this parcel will help fill the gap of the housing shortage our area currently faces.

Owner: Cedarland Forest Resources/ Cedarland & Co  
Parcel # 05230110302005  
10.8 Acres Kitsap County  
Address: XXX McCormick Village Circle

Sincerely,

Joe & Jessica Cedarland

Managing Partners of Cedarland & Co LLC

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Kitsap Environmental Coalition  
People for a Safe and Healthy Environment

February 29, 2024

The Kitsap Environmental Coalition (KEC) is a 501(c)(3) nonprofit organization that supports the protection of Kitsap's natural environment through advocacy and education. KEC recognizes the complexities of balancing social, economic, and environmental issues in the Comprehensive Plan Update especially as human actions are exacerbating climate changes that result in increasing temperatures, water supply issues, and sea level rise in our county.

With this perspective, KEC supports **Alternative 2 in the Comp Plan—with two exceptions.**

**The first exception is no upzoning on the outer edges of the current UGAs and cities or in rural areas.** (By “upzoning” we mean zoning changes that increase housing density.) KEC takes this position because:

- a. it is important to incentivize multifamily housing *within the core* of the existing UGAs and cities. Multifamily housing needs to be close to where affordable transportation and employment can be concentrated to better utilize the UGAs. We need to think in terms of *affordable living* and *affordable community*, not solely affordable housing.
- b. we need to protect our rural areas from sprawl. Sprawl weakens the natural environment that supports us all; our beautiful natural environment is a major reason people move to and visit Kitsap County.
- c. a concentrated look at the rural areas and open spaces of Kitsap County is needed and is not being done in the current 2024 Comp Plan Update. Please include a commitment in the 2024 Comp Plan to such an investigation in 2025-26. Leave rezoning considerations that affect rural changes until after Rural Kitsap and Open space is looked at as a whole. Center such an investigation on encouraging farming, agroforestry, healthy protection of critical areas, rural employment, and health for all living things.

The **second exception** is to require development to **retain existing trees** at a certain percent rather than relying on replanting trees after development (Title 17 Zoning, Development Regulations Revision).

Sincerely,

Kitsap Environmental Coalition Board

David Onstad  
Martha Burke  
Paul Larson  
Bruce McCain  
Reed Blanchard

## **Comments to Kitsap Planning Commission at Hearing on Draft Comprehensive Plan**

**March 5, 2024**

**Martha Burke** – *Sageomish*

There is no discussion of the impact of rising sea levels due to climate change and how this should impact development regulations of shoreline property. It is estimated that sea levels will rise over a foot by 2050. The County has done its own study (Kitsap County Climate Assessment Study 2020) that summarizes the projected effects, yet it does not appear that is impacting how these areas can be developed. There is a chapter in the Draft Comprehensive Plan that deals with climate change and it includes a policy (10.1) that calls for developing regulations designed to avoid or prohibit development, construction or reconstruction in areas with known severe slide potential or other geologic hazards. This needs to be expanded to address the hazard of sea level rise. East Coast states like Florida and Georgia have required homeowners to implement significant changes to mitigate these effects including raising building heights, but there is no evidence of that happening in Kitsap. Sea level rise expected in the coming years will result in changes to shoreline development potential and thus there will be adverse impact to the County and property owners if the Comprehensive Plan and the Shoreline Management Plan is not changed to include policies and permit requirements to address these effects when developing in the shoreline zone.

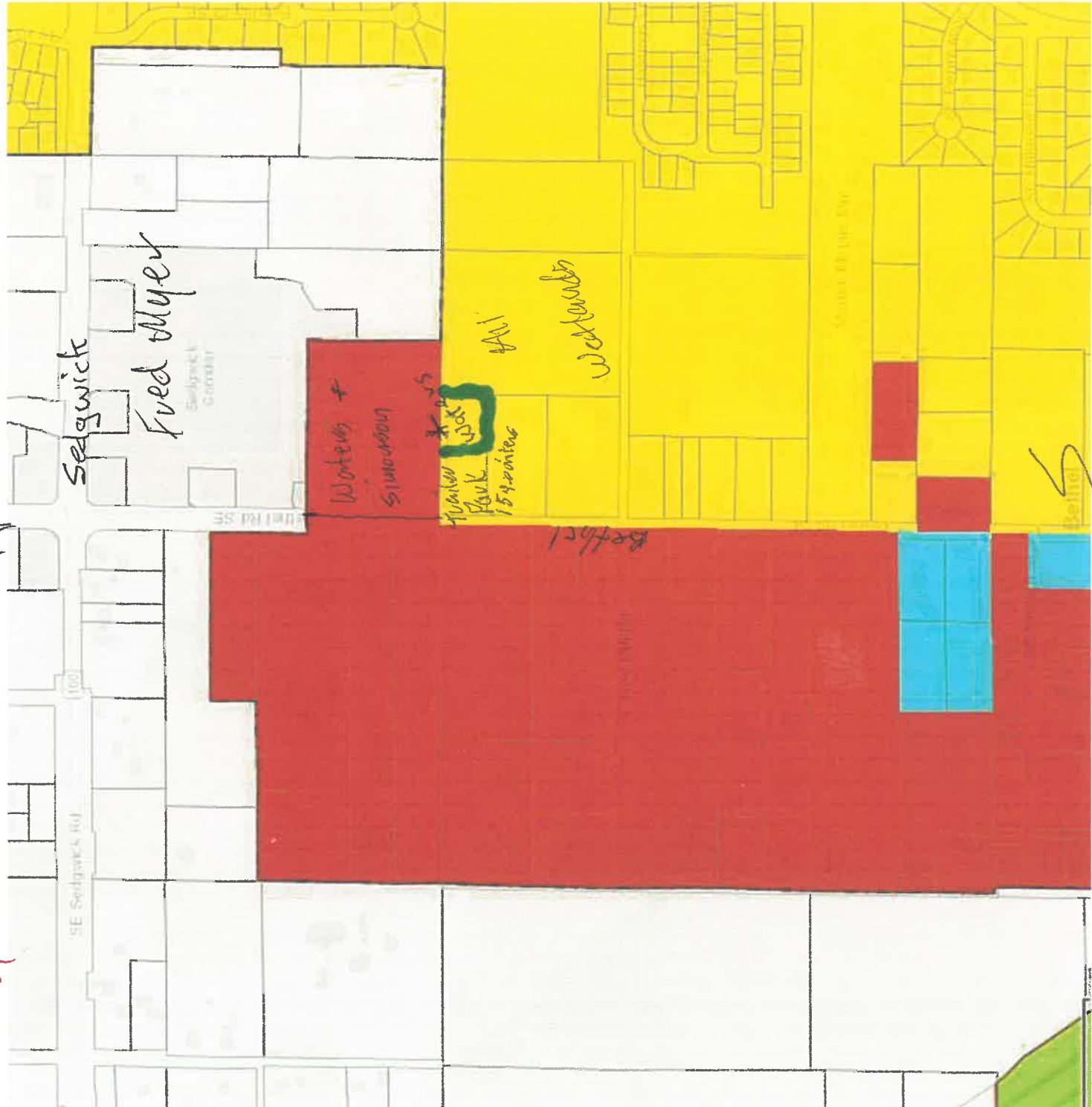
[Return to Comment Matrix](#)



~~Pat~~ Waters

N

image001.png



#Note Option 2  
Waters South Parcel  
#122301-2-035-2108  
Requesting addition  
to the west of wry  
parcels as  
Commercial  
Robert P Waters  
5163 Bethel Rd SE  
Port Orchard WA 98367  
360 340-1009

E

2





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Please place in public comments for the Comprehensive Plan Update

My name is Robin Salthouse, and I live in Kingston.

Kitsap County has the opportunity to sensibly and sustainably plan for future growth with the Comprehensive Plan Update. Alternative 2 is the best approach to meet the goals, policies and strategies found in the draft Comprehensive Plan Update. Focusing growth in Urban Growth Areas and leaving what's left of Kitsap County's rural areas in place will provide efficiencies in creating affordable housing, economic centers, recreation and transportation while providing protecting our climate, water sources, wildlife habitat and neighborhood community lifestyles. Allowing for growth that generates sprawl seen in several reclassifications requests, like those by Raydient (Jon Rose) that rezone rural wooded property to more dense housing puts pressure on achieving Comp Plan goals and destroys the "Kitsap County gem" recently described to me by an eastside Puget Sound visitor.

I would like to call attention to transportation issues addressed in both the Comp Plan Update and the Draft Environmental Impact Statement. A February 26 letter by Washington State Department of Transportation (WSDOT) Olympic Region found on page 563 on the comments link. WSDOT questions completion of "sufficient environmental analysis to, among other things, identify and mitigate impacts to the state highway system." WSDOT asks that the County perform a robust SEPA analysis to occur during development of Comprehensive Plan updates.

Secondly, the WSDOT letter continues to state a concern over how the DEIS uses an area-based approach that allows the Level Of Service standard to be exceeded on up to 15



percent of county roads. WSDOT is concerned that any exceedance of an LOS standard on a county road, if left unmitigated, has the potential to create a probable significant adverse impact to the state highway system. WSDOT requests that the DEIS transportation analysis be revised using proper application of the county roadway LOS standards.

Finally, WSDOT asks, in regards to project funding “For mitigations to significant impacts on the state highway system, acknowledgment of shared responsibility as it pertains to funding when local growth adds traffic volume and impacts on state system and this shared role be acknowledged and reflected in the budgeting process.” Having reviewed the Comp Plan link Appendix C - [Transportation Project Lists by Alternative](#), I agree that this request needs to be addressed. The WSDOT traffic counter at NE Gunderson RD shows a 4% increase in 2022.

WSDOT has brought some important issues to the County’s attention in this letter that should be addressed in future versions of the EIS to accurately plan for the impact large developments already planned and future growth will have on both our Kitsap County and State roads. If development is addressed without appropriate transportation planning and budgeting to address additional traffic, our communities will end in gridlock which adversely affects other Comp Plan Goals.

[Return to Comment Matrix](#)

March 4, 2024

Dear Kitsap County Planning Commission,

I am writing to share my thoughts about three points related to the Comp Plan Update before your March 5 meeting.

Each of my comments reflect my concern for how Kitsap County will direct growth and manage the development pressures we face in both the urban and rural parts of Greater Kingston.

1. I ask the Planning Commission to support the work of the 2018 Kingston UVC Workgroup and not reverse the changes finalized by the Kitsap County Board of Commissioners just a couple years ago. Please recommend approval of the Alternative 2 development regulations instead of Alternative 3 as they apply to the Kingston UVC.
2. I ask the Planning Commission not to support the approval of major commercial investments outside of our cities, UGAs, and LAMIRDs. The Raydient upzone request adjacent to the Port Gamble Forest Heritage Park is neither in nor near a UGA or LAMIRD and is part of a plan for intense development in that location. It should not be approved.
3. I ask Kitsap County to create new policies and development regulation elements with our County's heritage parks in mind. These should include clear definitions, goals, values, and restrictions on adjacent uses. The absence of this clarity leaves our heritage parks at risk.

### **1. Kingston Urban Village Center Development Regulations**

I was an at-large member of the Kingston UVC workgroup chartered by Commissioner Gelder in early 2018. It was a diverse team comprised of people representing commercial property owners, developers, real estate brokers, environmentalists, and citizens. We volunteered to meet in person weekly for three months. Outside of meetings the members were expected to read documents and come prepared to discuss and bring recommendations. The effort represented hundreds of hours of staff and volunteer effort.

The two most significant changes that were proposed and approved were the issues proposed to be changed in Alternative 3. The UVC Workgroup increased allowable building heights from 35 feet to 45 feet with setback requirements. It's important to note that TODAY the tallest facade along 104 in the UVC is just 20 feet tall. Kingston is not willing to abandon it's identity as a small maritime town with a pedestrian centered downtown as we embrace growth, infill development, and as we function as a regional transit hub. The second major change was to provide flexibility around the mixed use requirement. Please see the attached document prepared by Dave Wetter for the details around that change.

### **2. Washington GMA and the Raydient Upzone Request**

I am extremely concerned that both "local considerations" and opportunities for "public benefit" projects leaves the door wide open to intense development that will change the character of rural North Kitsap permanently. The multigenerational sports complex and center being proposed is not a need, it addresses an interest in convenience for families with children participating in club sports. As you know, investing in large projects outside of our cities and UGAs dilutes our already limited funding resources needed to provide city services inside the Kingston UGA.

The rural zoned communities surrounding the Streibels Corner LAMIRD will be experiencing the impacts of several development projects that are yet to be built. Approved projects include 970 new homes (i.e., the build out of the PG Redevelopment, Seaside, and Arborwood), new and growing tourist attractions expected to draw visitors from the greater Seattle area (i.e., PGFHP ride and adventure parks, PG winery/restaurants/stay accommodations, and an ever increasing

number of visitors to the Olympic Peninsula). There is neither a plan nor a desire for SR104 and Bond Road to be widened from 2 to 4 lanes yet projects are stacking up. The sports complex being envisioned is not a fit for this location. We don't have the infrastructure to manage the intense activity at this location without accepting impacts that cannot be mitigated.

As North Kitsap grows, we need to re-dedicate ourselves to staying aligned with the planning goals of the Washington GMA and holding the line to prevent unwanted sprawl that dilutes Kitsap County's already limited ability to provide city services in the Kingston UGA. If Kitsap County approves the Raydient upzone request they will be setting a dangerous precedent that will place the entire 104/Bond corridor between the Kingston UGA and the City of Poulsbo at risk of becoming 8 miles of sprawl.

### **3. Heritage Parks Require New Development Regulations & Policies**

It does not appear that Kitsap County has a clear definition for and policies around our heritage parks. For example, the use table is insufficient for determining appropriate uses adjacent to a heritage park. No reasonable person should believe that a racetrack should be allowed near heritage park lands. These parks are a huge asset to the Puget Sound region. The Port Gamble Forest Heritage Park is at risk of being degraded and being loved to death without consideration for what is and isn't appropriate use within and use near those lands.

I am not resistant to either growth or change but I do recognize that, without strong guardrails, we will lose what makes our region so special. We cannot permit that to happen.

Thank you,

A handwritten signature in blue ink, appearing to read 'Beth Berglund', with a stylized, flowing script.

Beth Berglund  
Resident of Gamblewood

email copy to:  
Christine Rolfes, District 1 Kitsap County Commissioner



## Port-Proposed Kingston Storefront Zone Meeting

*Statement prepared & read by Dave Wetter for March 28, 2023 community mtg*

2018 & 2019 Comprehensive Plan Task Force was assigned to address Reducing Barriers to Development in the Urban Village Core (UVC map purple).

**Participants:** Johnny Walker, Betsy Cooper, Jet Wolke, Jim Pivarnik, Jon Rose, Ken Hanson, Mike Brown, Rick Lanning, Beth Berglund and myself.

**Kitsap County staff:** Peter Best and Liz Williams.

A few of the major barriers to development identified were:

### 1. MIXED USE REQUIREMENT

Every site in the UVC was zoned mixed use, the concept being, commercial on the ground floor and residential on the upper floors.

From a practical standpoint this limited the building to 3 floors or a ratio of 2 SF of residential to 1 SF of commercial. This is simply not sustainable. Our existing downtown businesses, in this town of roughly 2,500 people, were already struggling in the winter months. Forcing more commercial space into the UVC didn't make any sense.

A more sustainable ratio might be in the area of 30 SF residential to 1 SF of commercial. Bainbridge Island which has roughly 10 times the population of Kingston, has a mixed use development on Winslow Way right across the street from the ferry parking lot that was built roughly 10 years ago.

They have struggled to keep the ground floor occupied and, as of this past Sunday, they have 3 of 9 commercial spaces vacant.

Kingston simply needs more residential units to support commercial occupancy. By designating space as commercial does not make it commercially viable and/or occupied. The market, not code, determines

## **Port-Proposed Kingston Storefront Zone Meeting**

*Statement prepared & read by Dave Wetter for March 28, 2023 community mtg*

what occupies commercial space.

The Task Force suggested that mixed use should be optional in the UVC zone and not by specific site. A compromise was worked out with the staff that convertible ground floor space should be limited to eastbound 104 and Washington Avenue.

Convertible space (depending on market demand for commercial) is space that could, initially, be residential which could be later converted to commercial as needed.

Commercial space has four significant additional costs over non-commercial space. Those being higher ceilings, Fire Sprinklers, ADA access and air conditioning.

From a practical standpoint, a developer of convertible space, would likely have to, initially, build the higher ceilings and maybe some of the ADA access requirements.

The fire sprinklers, Air conditioning and some of the ADA requirements could be addressed at the time of conversion to commercial space.

If this ground floor commercial / convertible zone was to be considered for expansion, it should not be undertaken lightly, lest we, again, raise up the same barriers to development that were just removed before the pandemic.

A fact-based market study should be conducted which should include comparable populations. And, ground floor storefront space need not be the entire floor, particularly, for deeper sites and our low population.

## Port-Proposed Kingston Storefront Zone Meeting

*Statement prepared & read by Dave Wetter for March 28, 2023 community mtg*

### 2. PRESCRIPTIVE LIMITATIONS ON HOUSING TYPES

Another barrier to development was the requirement that any residential in the UVC zone need to be attached or multi-use. The Task Force advanced the argument that, as long as the density requirements are being met, the county should not dictate the type of residential style.

Let the market decide the product. This argument prevailed in the approved use table.

This brings us to the Design Standards for the Community of Kingston. (The little city by the sea) Stated Purpose (page 4 after yellow tab):

*“The purpose of the following Design Standards is to help implement the physical aspects of the Kingston community vision for downtown in the Kingston Subarea Plan. These standards are intended to promote Kingston’s small town character and support economic vitality while accommodating the impact of existing regional transportation and tourism issues. The intent is not only to provide some assurance to the community of basic conformity to the vision statement but, also to encourage creativity.”*

The Task Force supported this purpose by suggesting the developers should use their creativity to implement a performance-based, and marketable product, that fit this small town character vision, and that met the density requirements.

The developer’s solution might not be a ubiquitous and/or prescriptive 3 or 4 story rectangular block but, rather, hopefully, something more unique.



## **Port-Proposed Kingston Storefront Zone Meeting**

*Statement prepared & read by Dave Wetter for March 28, 2023 community mtg*

### **3. REQUIREMENTS PROBLEMATIC FOR SMALL PARCEL INFILL**

Another barrier to development was the UVC relatively small sites that, in addition to store frontage, and density, they also needed to accommodate parking on site and 15% landscaping.

We were able to get some parking reductions with the implementation of the High Capacity Transit Station Area. Also, by some adjacent street parking and remote parking.

Other barriers were addressed in the 2019 Comprehensive Plan Amendments ordinance and use table.

Before the Committee's work could be approved, it first had to be publicly vetted in Kingston and presented before the Board of Commissioners in a public hearing.

On 4-27-2020, the Board of Commissioners approved the Task Force final recommendations which are in the notebook I distributed.

[Return to Comment Matrix](#)

My name is Stacy Marshall and I am here as 24 year resident of Kitsap County, a small business owner since 2003 and farmer since 2017. I am joined by my husband and 15 year old son. The farming community is incredibly meaningful to us.

We are here on behalf of our farmland preservation group, a group of farmers whose experience spans three decades and includes some of our most seasoned farmers as well as those new and young.

Our farmland preservation group supports **alternative number two** for the comprehensive plan. Focusing development within UDAs and enhancing these already developed areas must be a priority for our county.

In the public Planning Commission meetings I've attended since December 2022, it has become clear that farmland will not be meaningfully addressed in the 2024 Comprehensive Plan update.

Our group asks that the Commissioners, with direction from County Planners, develop an addendum in 2025 that will include a farmland preservation action plan with clear strategies, developed under the guidance of the newly formed Agriculture Advisory Committee. Given that only one chapter of the Comprehensive Plan can be opened at any given time, we are asking that the RURAL Chapter of the Comprehensive Plan be given first priority. We ask that there be clear language in the 2024 Comprehensive Plan which addresses the commitment to the 2025 addendum.

The addendum action plan should address incentives for private landowners to protect farmland such as funding sources for agricultural easements, tax incentives to keep land in farming and other innovative opportunities.

**Until this action plan is created we are asking for a moratorium on changes in zoning and land use in rural areas.**

We are asking that a .5 FTE staff person at KCD be funded immediately for the support of the Ag Advisory Committee. To not fund this position is to hamstring this committee from the outset.

We are also asking that the county address in a meaningful way, DEI and farmland lost to the BIPOC community, especially the indigenous communities, as well as to women farmers. This is the only way forward.

Our group would like the Comprehensive Plan to include a more precise definition of rural character using allowable land uses and activities permitted in rural zones in the key terms.

Lastly, language matters. We want to see cohesive and strong language as it relates to agricultural practices and farming in our community. The Comprehensive Plan uses language such as “hobby,” “micro” and “small” when speaking about farms, farmers and farmland. Farmers farm and farming is farming.

Thank you.

Stacy Marshall  
2558 NW Sherman Hill Road  
Poulsbo, WA 98370  
[petalandpitchfork@gmail.com](mailto:petalandpitchfork@gmail.com)  
[www.petalandpitchfork.com](http://www.petalandpitchfork.com)  
[www.groundsforchange.com](http://www.groundsforchange.com)

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Planning Commission Meeting Tuesday March 5, 2024  
Walt Elloitt, resident, Kingston, Kitsap County  
Comment on 2024 Comprehensive Plan Update, Draft Environmental Impact Statement

#### Commission Members

Over the last year, Kingston Rotary along with 22 local youth sports organizations have assessed active recreation needs and available facilities in North Kitsap. There are large and growing gaps. This is a critical issue for families, and we are concerned that the Draft Environment Impact Statement (DEIS) does not address active recreation. Please see the attachments for details on these comments.

Information and analysis are needed to assess the three alternatives with respect to meeting active recreation needs.

- There are no projections of active recreation needs in the DEIS. While the DEIS refers to the upcoming Kitsap Parks Recreation and Open Space Plan (PROS), that Plan is behind schedule and will not be available to assess Alternatives with respect to their active recreation impact.
- A Level of Service (LOS) analysis using the 2012 PROS Plan is being used in the DEIS used for assessing the Alternative impacts on passive recreation. While the 2012 Plan also provides active recreation LOS, that analysis has been left out of the DEIS.
- Our collected data shows there may be significant differences in the ability of the Alternatives to meet this gap.

There are mitigation options to meet growing active recreation needs. The inclusion of the NK Sports campus in rezone project 72 for Alternative 3 would be a major step. That should be included in the analysis of alternatives. In our search of alternative locations this site was found to be uniquely suitable.

- Other available North Kitsap sites, with sufficient areas for fields, have extensive wetland constraints limiting the developable area.
- Sites adjacent or near north Kitsap areas already have significant congestion due to geographically constrained road access. A sports complex and would add to that congestion.
- The Site is centrally located in north Kitsap and, from a formal survey (attached), north Kitsap residents considered it to be readily accessible.
- Initial environmental studies of the proposed sports campus site indicate the environmental impact there would be less than the equivalent of dispersed, single purpose sites.

#### Recommendation

The Department should include active recreation in the analysis of Alternatives. Lacking other sources, we can provide needs information collected from Kitsap youth sports organizations. We recommend that rezone 72 with a stipulation to include land for sports facilities be included as a mitigation option in the Alternatives because of its singular connection with a major need not otherwise addressed in the Plan.

Walt Elliott for the Kingston North Kitsap Rotary, Sports Campus Committee

# Active Recreation Needs



# North Kitsap Field Analysis:

<b>FIELDS:</b>	<b>NUMBER:</b>	<b>PLAYING SHAPE (1 (poor) to 5 (great)):</b>
Buck Lake Park	2 or 3 field space (soccer) + Playground Structure	2
	2-Beach Volleyball Court	
Gordon Elementary	1-Baseball + 1-field space	1
<u>Breidablik</u> Elementary	1-Baseball & Playground Structure	3
Indianola Orca Field	1-Baseball + 1 field space & Playground Structure	2
Kola Kola Park	1-Baseball + 1 field space	2
Kington Middle School	2-Baseball + 2 field space & Track, Football	1
Kingston High School	1-Baseball, 1-Softball & 1-Track, 1-Turf Football	2
	1-Outdoor Basketball, 2-Tennis/Pickleball Courts (Tennis/Turf/Track – 4 or 5)	
North Kitsap High School	4-Baseball/Softball + 3 field space & Track, Turf Football	4
	6-Tennis/Pickleball Courts	
Pearson Elementary	1-Baseball + 1 field space + Playground Structure	3
S'Klallam Tribe Fields	1-Baseball + 1 field space + Playground Structure	4
	1-Indoor Basketball Court	
Poulsbo Elementary	1-Baseball + 1 field space + Playground Structure	3
Poulsbo Middle School	3-Baseball + 2 field space & Track, Football	1
Snider Park (Little League)	6-Baseball (All Tournament Play Eligible)	4
Suquamish Elementary	1-Baseball plus field space (+1)	
Suquamish Community	1-Baseball + Outdoor Basketball Court	3
Strawberry Field	3 or 4 field space (soccer), 1-Turf Soccer/Football	3 or 4
Vinland Elementary	3 or 4 field space (soccer) + Playground Structure	3
<u>Wofle</u> Elementary	2 or 3 field space (soccer) + Playground Structure	2 or 3
Village Green Community	Playground, Half Indoor Basketball, 2-Tennis/Pickleball	4.5



# Today's Youth Sports Number Issues:

## SPRING 2023 BASEBALL CURRENT NEEDS:

- 78-teams x 2-practices/week x 1.5 – 2-hour practices = 312
  - 78-teams x 1-game/week x 2-hours per game = 78
- 390 hr/wk**

## AVAILABLE FIELD SPACE:

- 18-available practice fields x 3-hours/weekday x 5-days/week = 270
  - 6-game day fields x 5-games/field x 2-weekend days/week = 60
- 330 hr/wk**

# Sports Summit Meeting:

\*September 15th – 25-people, 15-NK sports/rec organizations

## KEY TAKEAWAYS (AMONG OTHERS):

\*Central location, cut down distance families travel to activities

\*Need more turf and lighted fields – biggest need Spring/Fall

\*Need more indoor court space; biggest impact on girls (volleyball, cheer)

\*Too many teams sharing field space (soccer – three teams on one field)

\*10%+ growth YOY in nearly every youth sport activity

# Sports Summit Meeting:

## KEY TAKEAWAYS:

- \*Nearly 80% of field space owned by North Kitsap School District
- \*Costs to use are too high – supply/demand compounds issue
- \*Who you know and priorities given to some for usage & priority
- \*NK Soccer Club – 560-kids (93% YOY increase)
- \*Peninsula Flag Football League – 3-conferences (NK, CK, SK)  
753-kids participating (fall season)



# Today's Kitsap Youth Sports Numbers:

	<u># of Kids</u>	<u># of Teams</u>
*Baseball (NKLL, KYSA)	900+	78
*Soccer (NKFC, BIFC, KYSA)		
*Basketball (PPR, KYSA)		
*Flag Football (PFFL)	1,000+	
*Lacrosse		
*Cheerleading (Youth - ), (Middle School - ), (High School - )		
=====		
*Pickleball		

**\*\*\*Youth = Ages 5-14\*\*\***

# Our Needs Assessment:

\*Baseball/Softball:

- 4 - more outdoor fields (at least two turf w/ lights)
- 2 - indoor fields

\*Soccer/Football/Lacrosse:

- 6 - more outdoor fields (at least two turf w/ lights)
- 2 - indoor fields

\*Basketball – 2-indoor courts, 2-outdoor courts

\*Volleyball – 2-indoor courts, 2-outdoor courts

# Our Needs Assessment:

- \*Pickleball – 4-indoor courts, 4-outdoor courts
- \*Tennis – 2-indoor courts, 2-outdoor courts
- \*Cheerleading, Wrestling, Gymnastics
  - \*At least 1-indoor court space to utilize
- \*Swimming – One 6-8 lap lane, indoor pool






# North Kitsap/Poulsbo Market Study Refresh

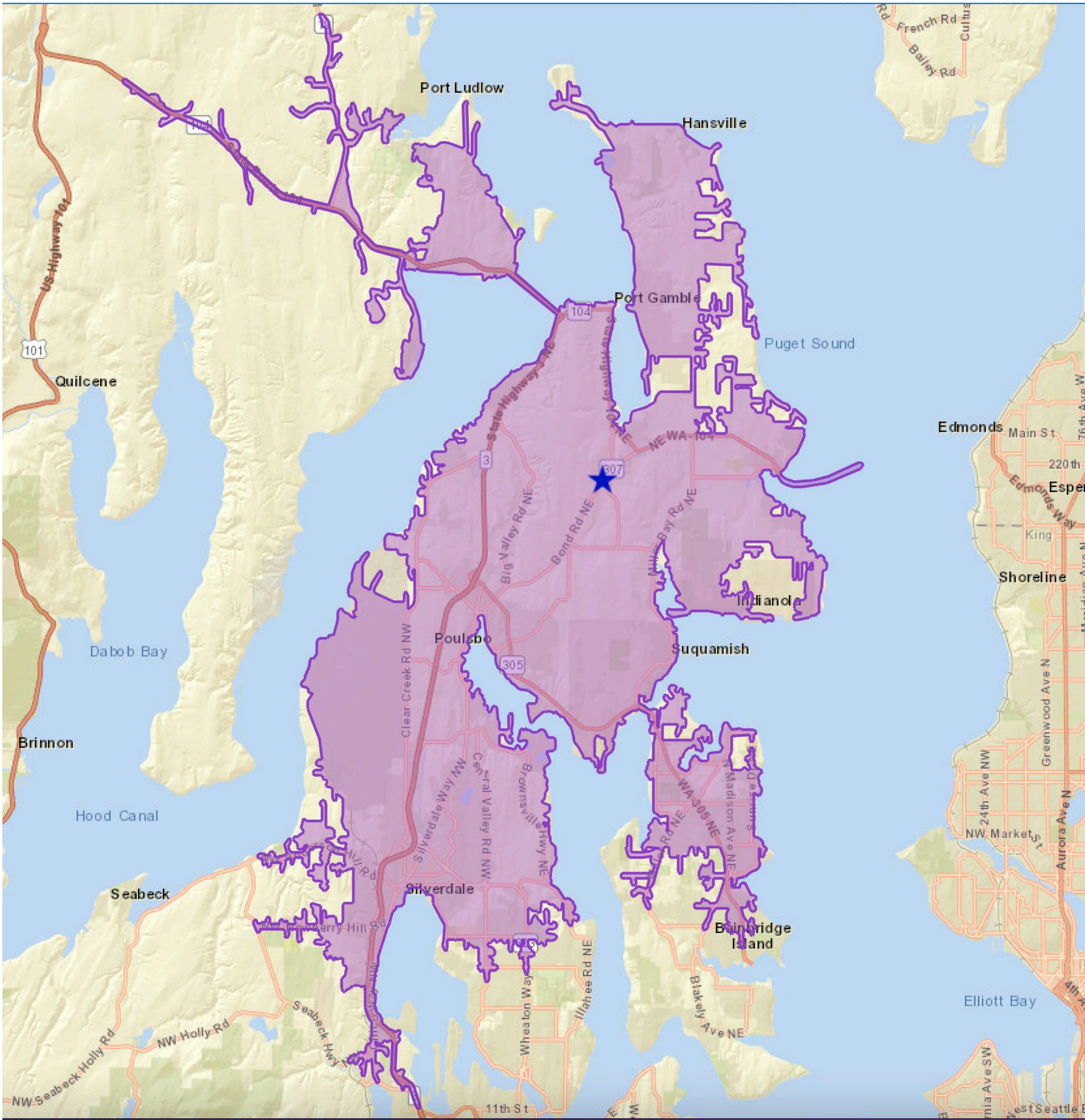
June 20, 2023

Prepared by: Lori Swann  
Triangle2 Solutions  
[lori@triangle2.com](mailto:lori@triangle2.com)  
615.948.9622



The YMCA of Pierce & Kitsap County commissioned a study to refresh data from an original July 2016 study in North Kitsap County. The methodology for this new study included 408 completed phone interviews and a refresh of all demographic data.







# COMMUNITY SUMMARY

Bond Rd NE & Stottlemeyer Rd NE, Poulsbo, Washington, 98370  
Drive time of 23 minutes

95,474	0.66%	2.52	53.6	41.9	\$100,672	\$553,681	\$331,111	19.7%	59.8%	20.5%
Population Total	Population Growth	Average HH Size	Diversity Index	Median Age	Median HH Income	Median Home Value	Median Net Worth	Age <18	Age 18-64	Age 65+



15.0%  
Services

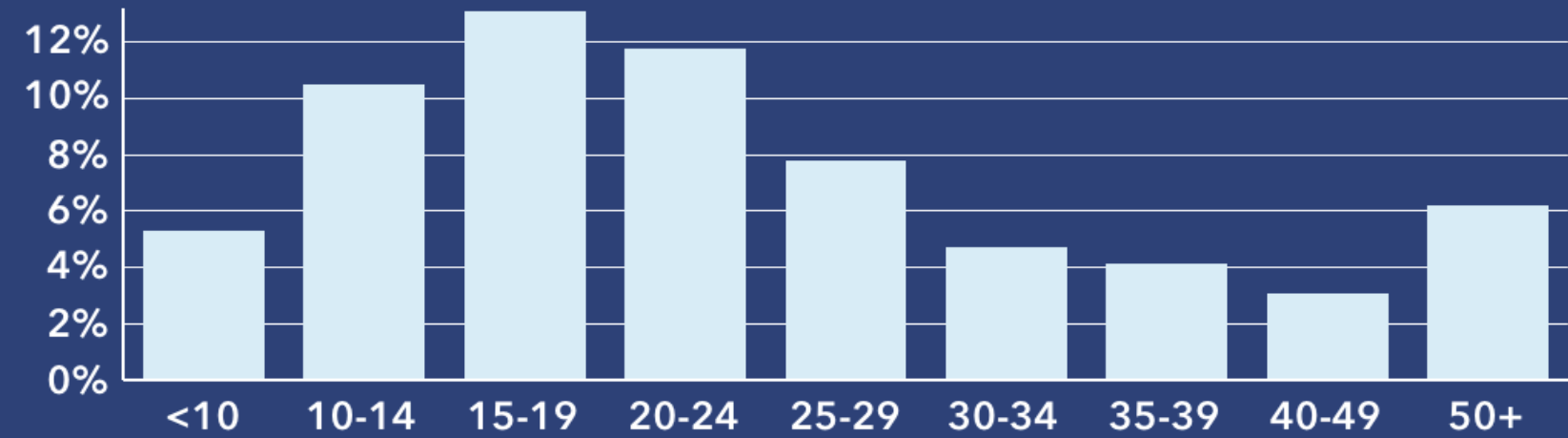


18.0%  
Blue Collar

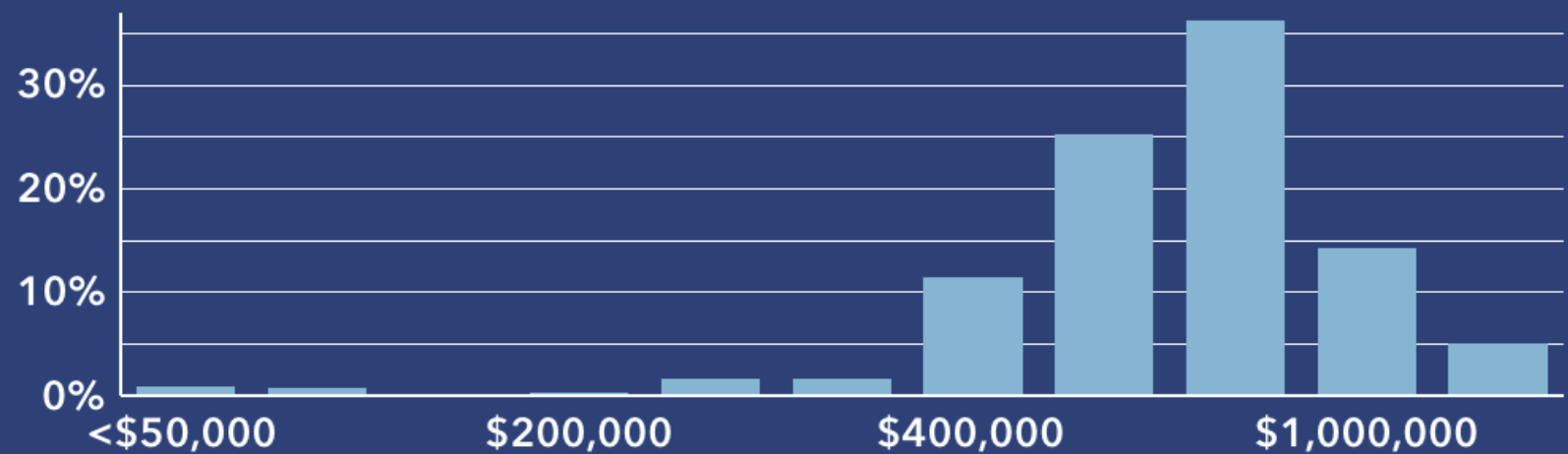


67.1%  
White Collar

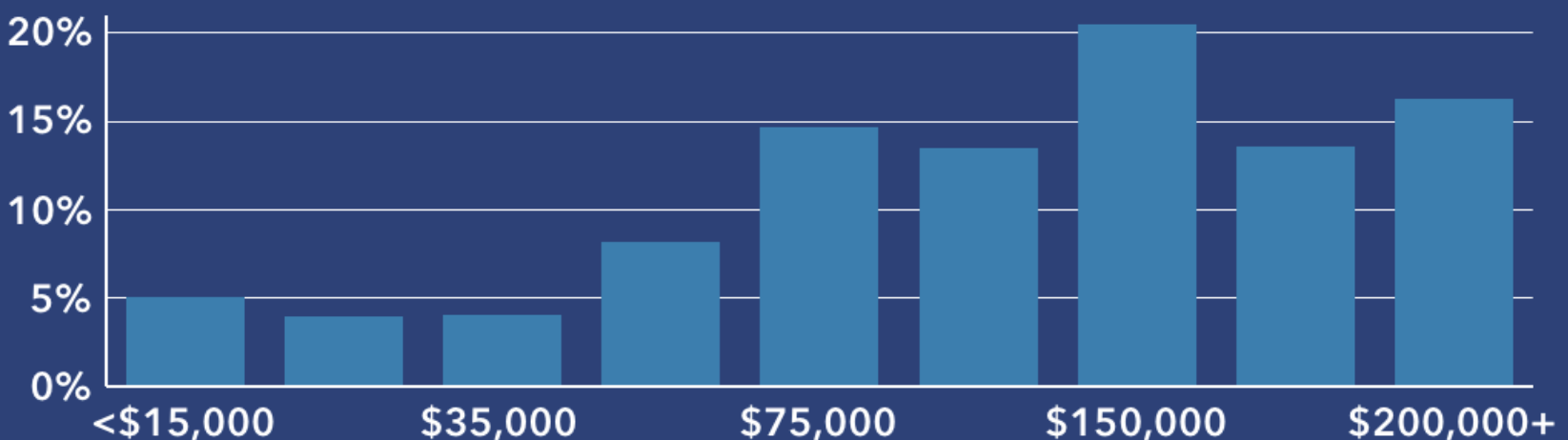
Mortgage as Percent of Salary



Home Value



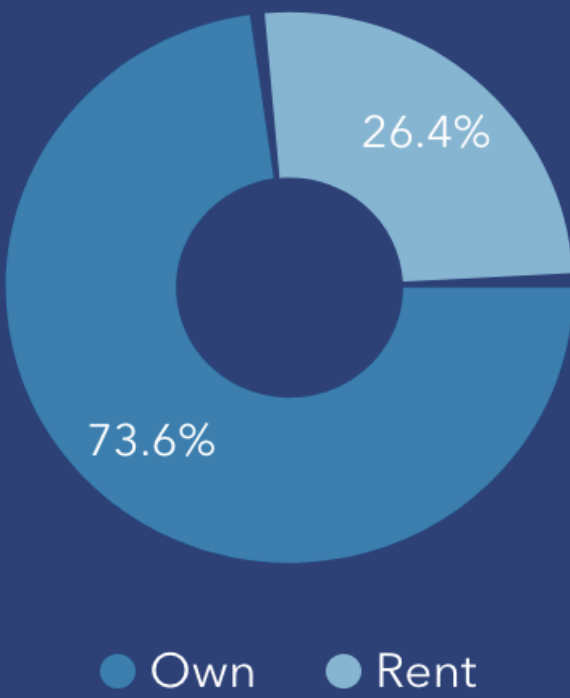
Household Income



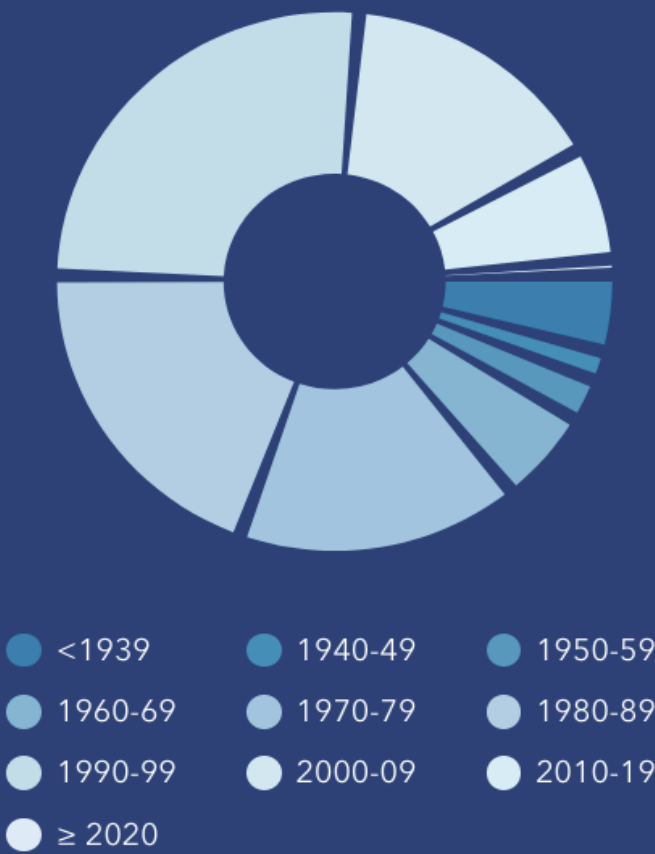
Age Profile: 5 Year Increments



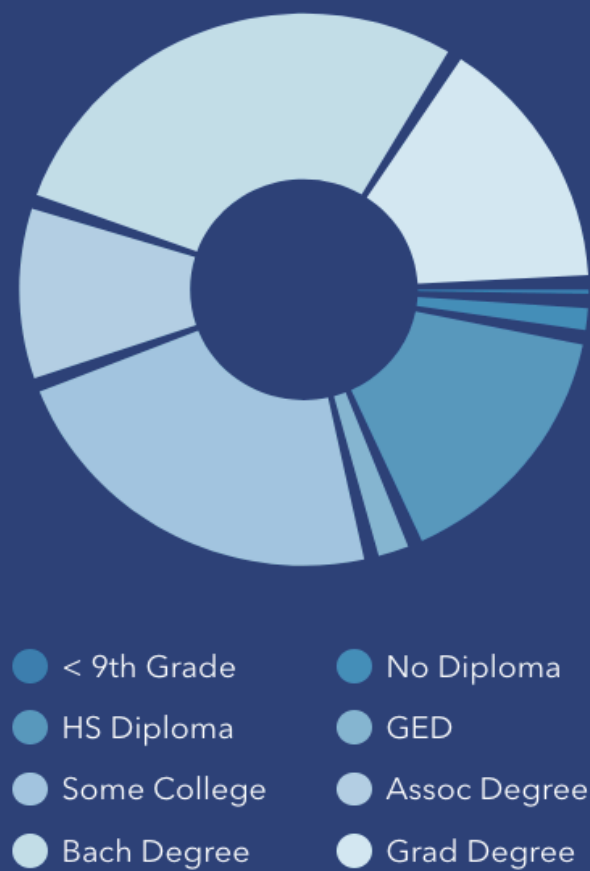
Home Ownership



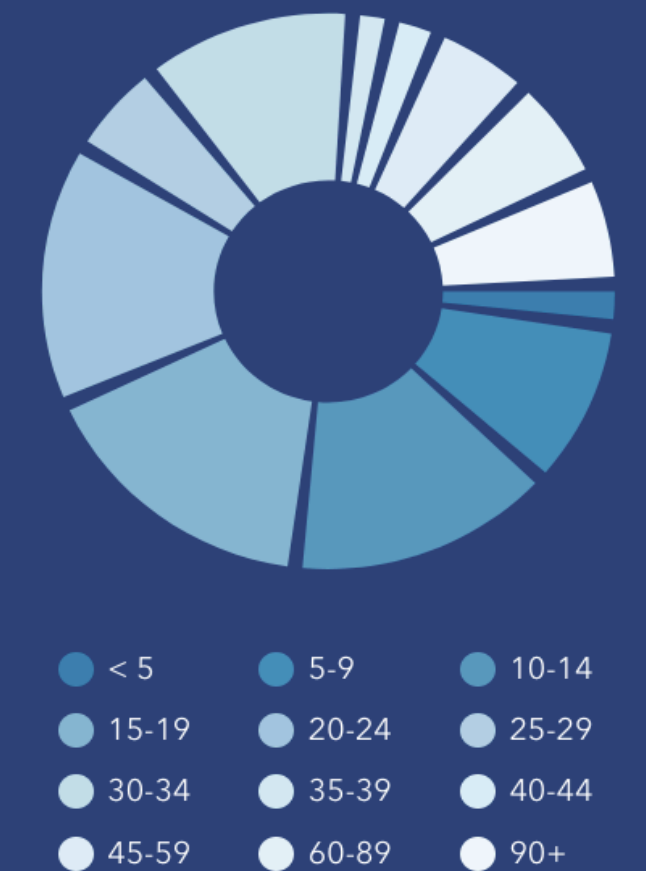
Housing: Year Built



Educational Attainment



Commute Time: Minutes



Summary	Census 2010	Census 2020	2022	2027
Population	86,616	93,528	94,746	96,381
Households	33,076	35,807	36,275	36,865
Families	23,129	-	24,943	25,407
Average Household Size	2.53	2.54	2.54	2.54
Owner Occupied Housing Units	22,913	-	26,639	27,207
Renter Occupied Housing Units	10,162	-	9,636	9,657
Median Age	39.3	-	41.9	42.9
Trends: 2022-2027 Annual Rate	Area	State	National	
Population	0.34%	0.52%	0.25%	
Households	0.32%	0.50%	0.31%	
Families	0.37%	0.52%	0.28%	
Owner HHs	0.42%	0.74%	0.53%	
Median Household Income	2.71%	3.77%	3.12%	
Households by Income	2022		2027	
	Number	Percent	Number	Percent
<\$15,000	1,417	3.9%	902	2.4%
\$15,000 - \$24,999	1,341	3.7%	856	2.3%
\$25,000 - \$34,999	1,306	3.6%	819	2.2%
\$35,000 - \$49,999	2,920	8.0%	1,944	5.3%
\$50,000 - \$74,999	6,463	17.8%	5,739	15.6%
\$75,000 - \$99,999	5,543	15.3%	5,634	15.3%
\$100,000 - \$149,999	8,720	24.0%	9,719	26.4%
\$150,000 - \$199,999	3,930	10.8%	5,363	14.5%
\$200,000+	4,633	12.8%	5,887	16.0%
Median Household Income	\$95,137		\$108,762	
Average Household Income	\$126,173		\$148,863	
Per Capita Income	\$48,907		\$57,583	

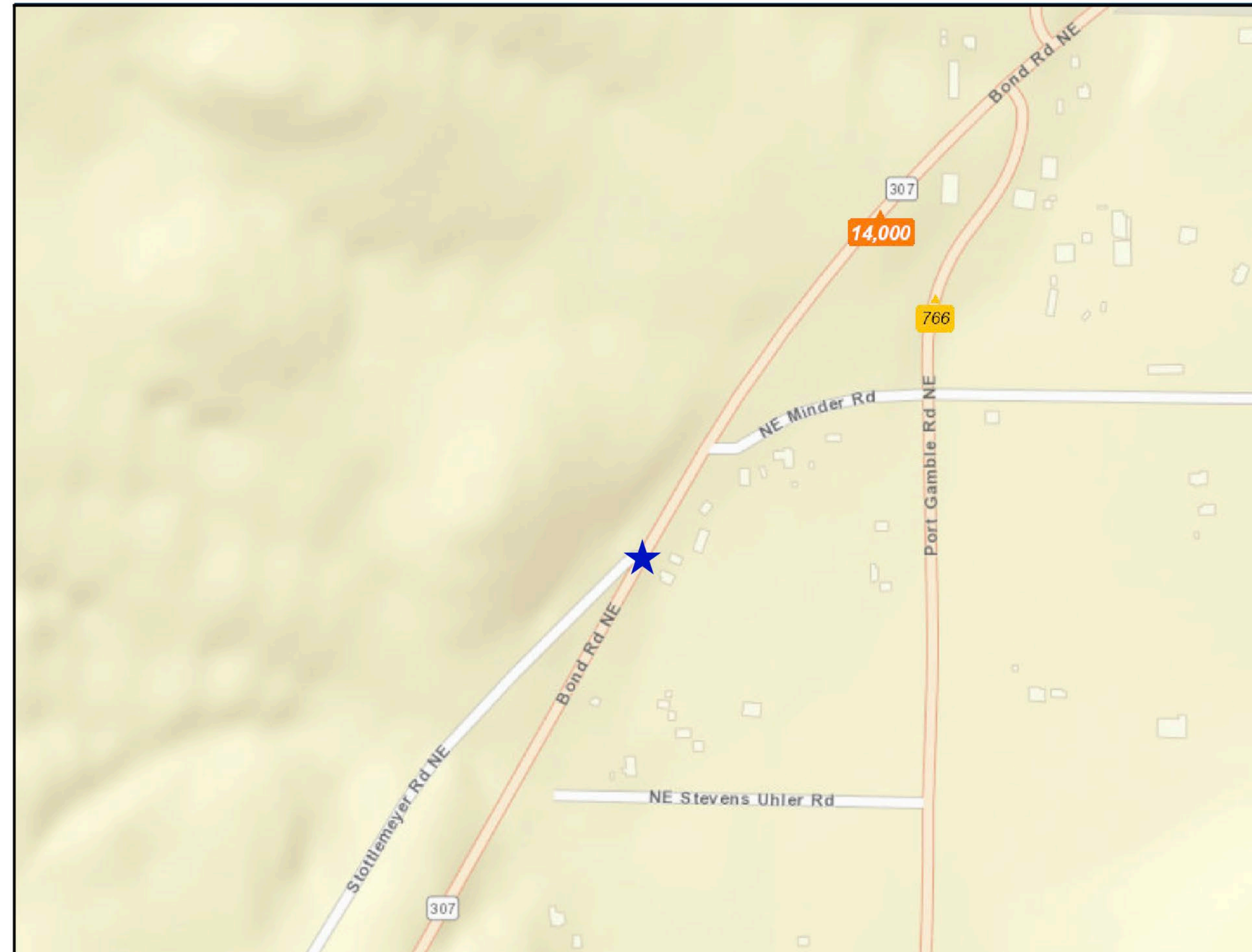




## Traffic Count Map - Close Up

Bond Rd NE & Stottlemeyer Rd NE, Poulsbo, Washington,  
Drive Time: 23 minute radii

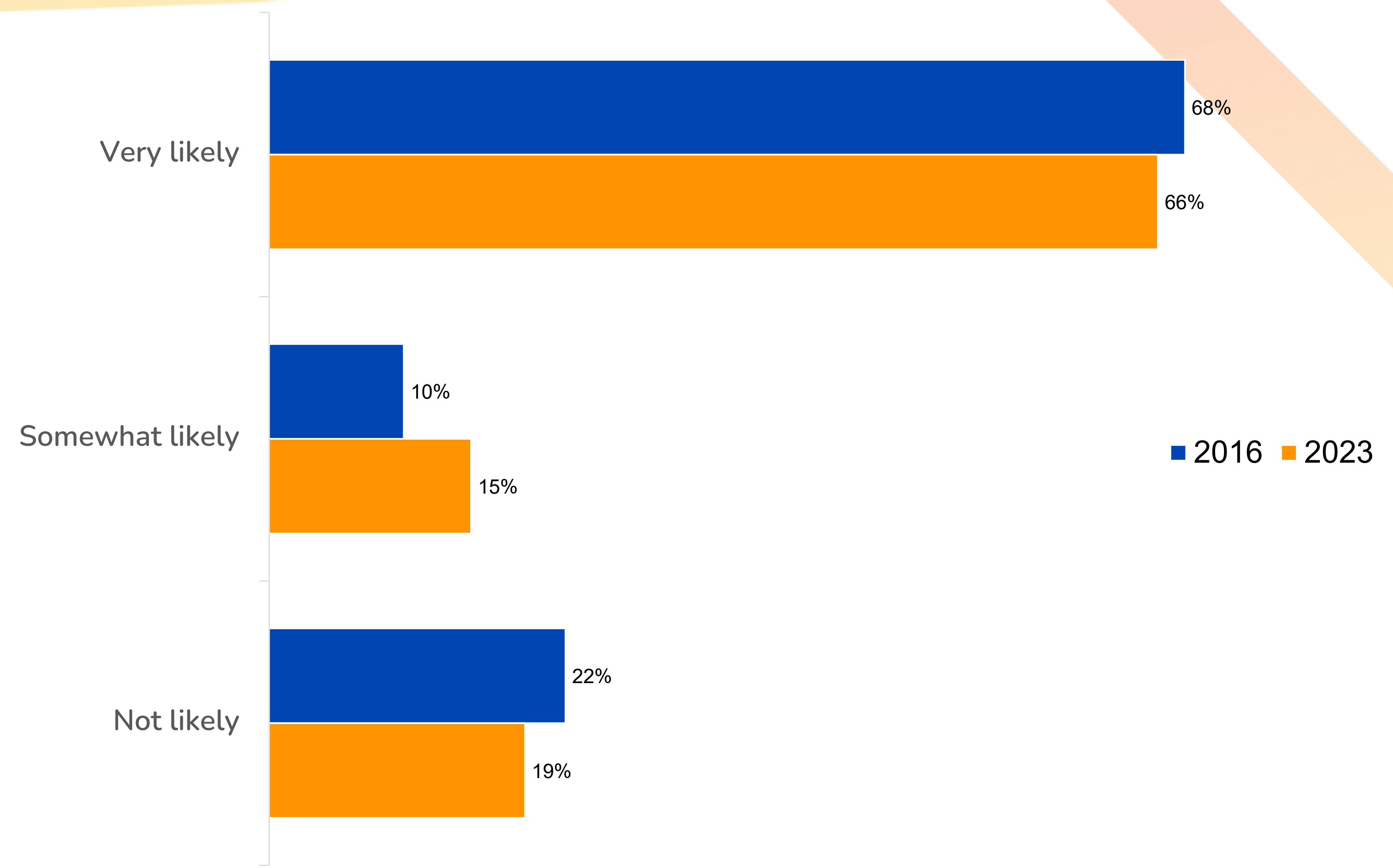
Prepared by T2  
Latitude: 47.79390  
Longitude: -122.58915

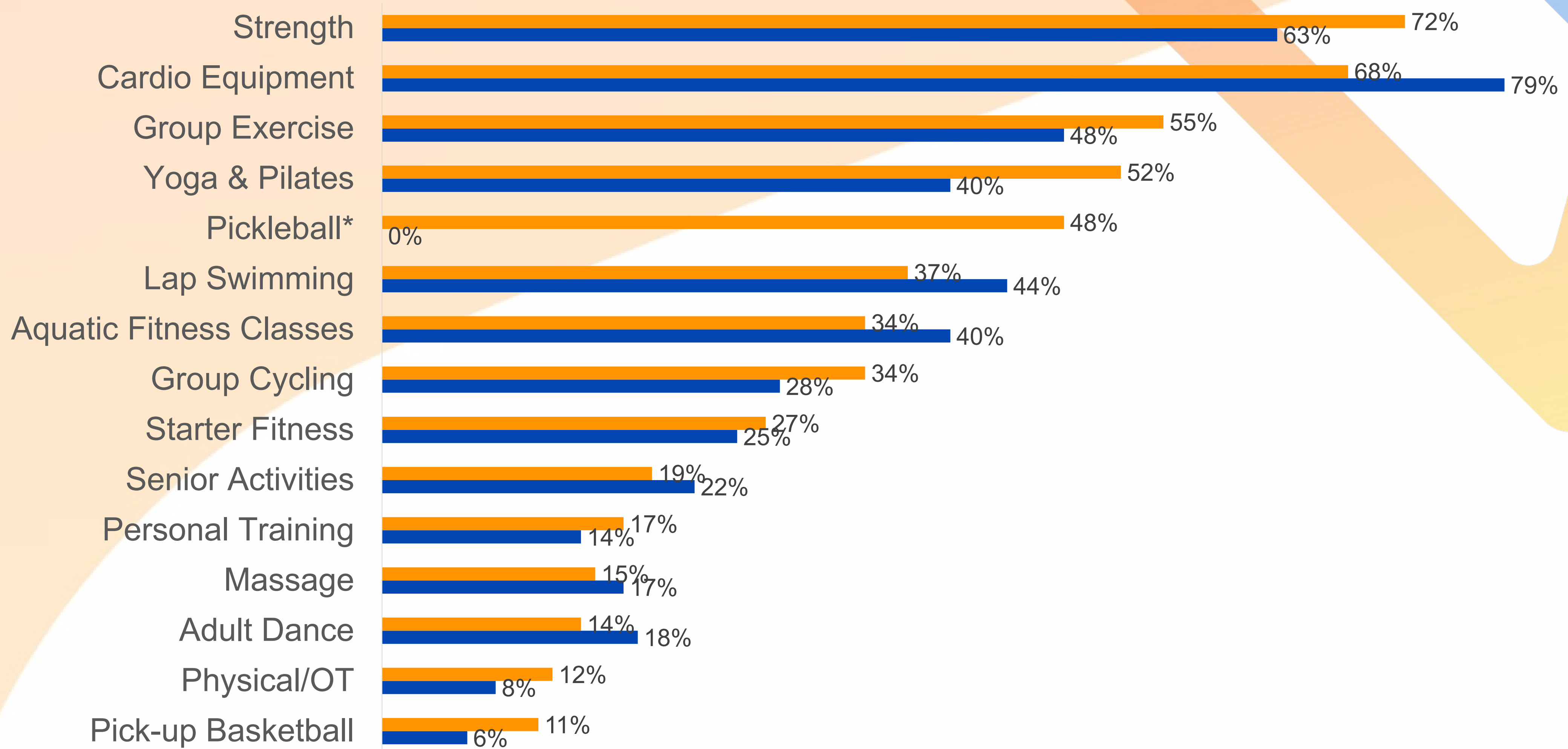




# Findings

If a multipurpose recreation center or YMCA was developed to serve the health and fitness needs of Poulsbo and the surrounding communities, how likely would you be to use it?

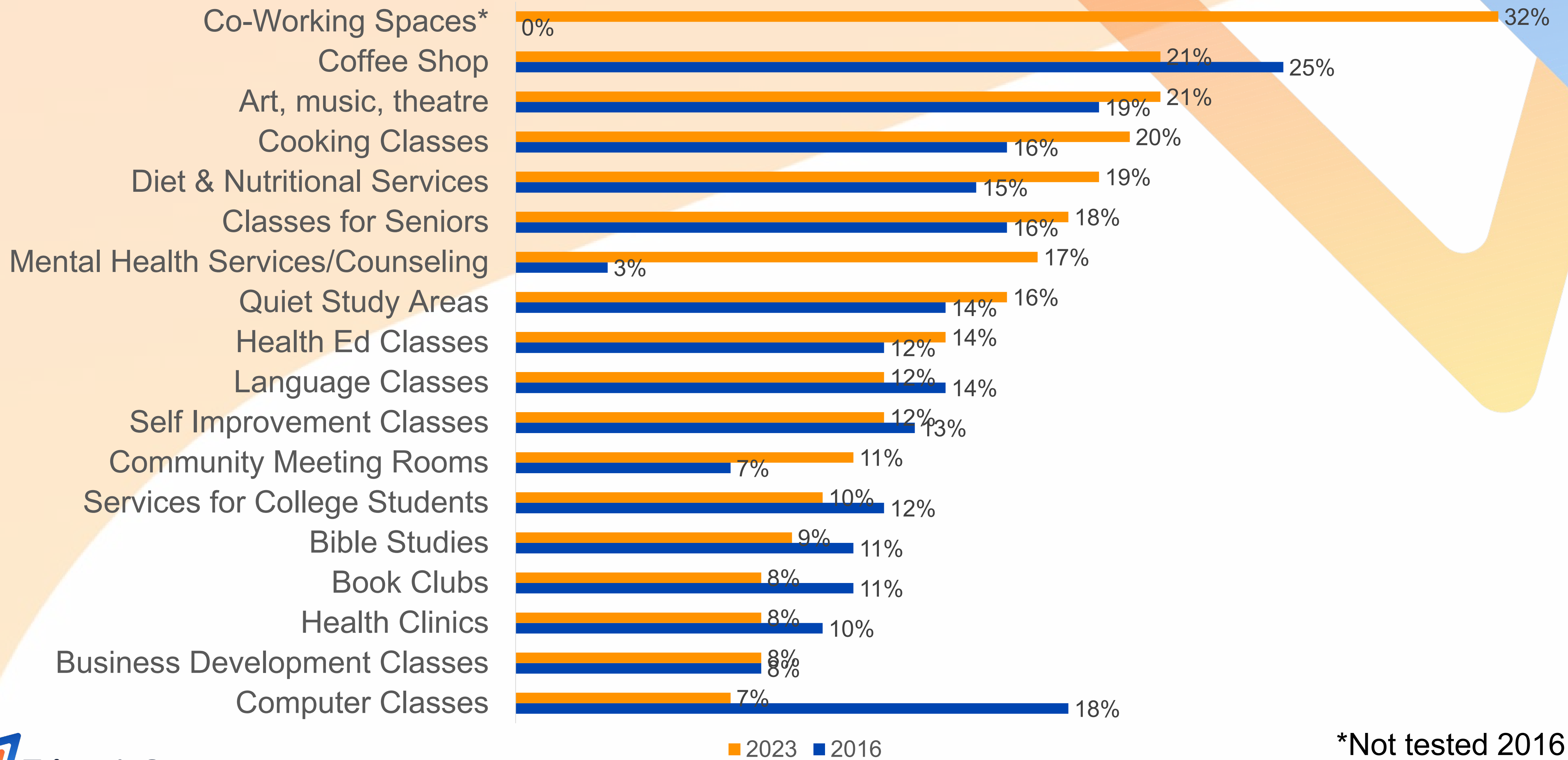




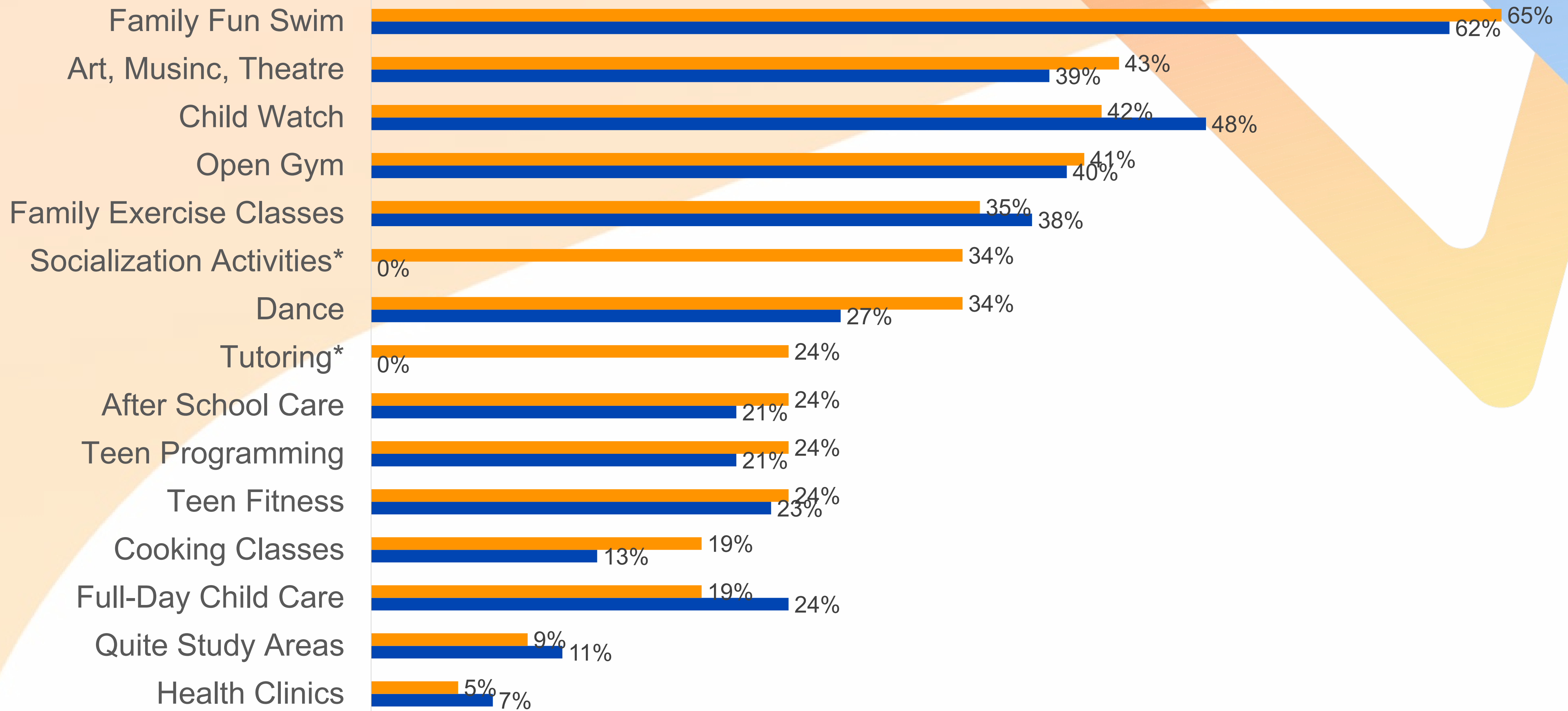
■ 2023 ■ 2016

\*Not tested 2016



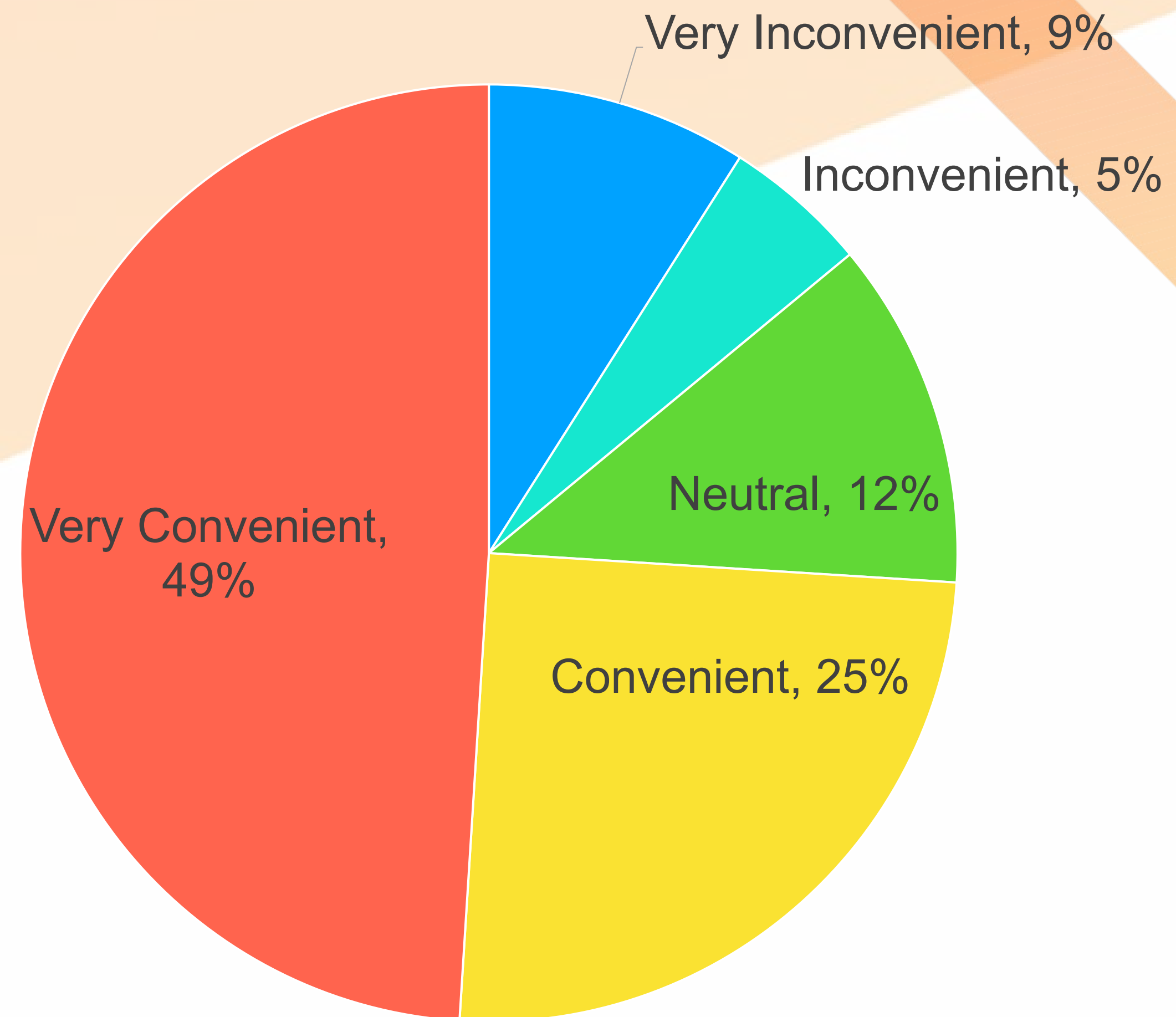


\*Not tested 2016



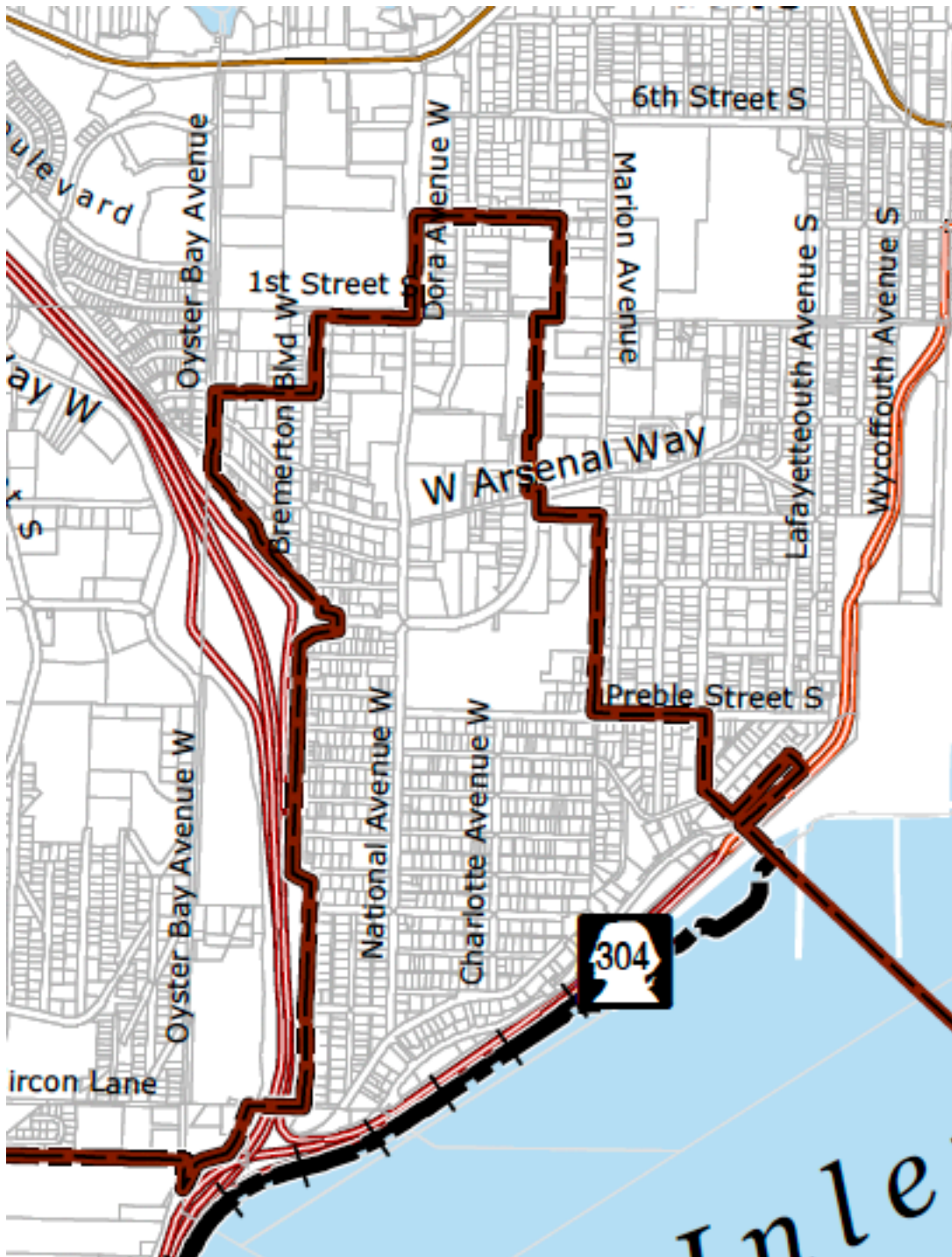
■ 2023 ■ 2016

\*Not tested 2016





	2016	2023
Total Households	31,543	36,865
Projected Family Units	1,470	1,890
Projected Adult Units	930	1,418
Projected Couple Units	160	420
Projected Young Adult Units	1,855	1,802
<b>Total</b>	<b>4,416</b>	<b>5,530</b>
Current YMCA Units that will transfer some or all usage to new facility (included above)	1,884	?



[Return to Comment Matrix](#)

March 22, 2024

Kitsap County DCD  
Attention: Eric Baker  
619 Division Street  
Port Orchard, Washington 98366

Re: Kitsap County Comprehensive Plan 2024 Update

On behalf of Kitsap County Association of REALTORS® (KCAR) and its more than 650 members, we are pleased for the opportunity to provide comments on the proposed alternatives for the Kitsap County 2024 update. KCAR is committed to ensuring REALTORS® work to actively advocate on behalf of homeowners and individual property owners. As you are aware, we are currently amid a housing crisis here in Washington state. In fact, according to the Washington Department of Commerce, we will need 1.1 million additional homes to accommodate the current housing gap and our future population. We are writing to express our support for Alternative 2 with some aspects from Alternative 3 for Kitsap County's planning strategy.

While Alternative 1 serves as a baseline, it falls short in adequately addressing the future needs of our community in terms of growth and housing diversity. Alternative 2 offers a proactive approach to growth by aligning with Vision 2050 and Countywide Planning Policies. By targeting growth around high-capacity transit facilities and urban centers, such as Silverdale and Kingston, we can create vibrant and sustainable communities. The emphasis on increased housing diversity and incentives for multi-family development will not only accommodate population growth but also promote inclusivity and affordability.

Similarly, Alternative 3 acknowledges past growth trends while providing opportunities for additional rural housing and employment. While it may not fully align with future growth targets like Alternative 2, it offers a balanced approach that considers the unique characteristics of Kitsap County. By expanding UGA boundaries predominately in Silverdale, Kingston, and Bremerton, we can accommodate growth while preserving the rural character of Kitsap County.

However, it's important to note that Alternative 3 lacks the same level of emphasis on housing diversity and incentives for multi-family development seen in Alternative 2. Therefore, while it offers valuable insights into managing growth, it may not fully address the need for diverse housing options and compact development.

In conclusion, we believe that a combination of Alternative 2 and 3 can offer a comprehensive approach to planning that balances growth and housing diversity. By leveraging the strengths of both alternatives, we can create resilient and inclusive communities that meet the needs of current and future generations in Kitsap County.

We appreciate the opportunity to comment on this matter.



Respectfully Submitted,

Andrew Magallanez  
Chief Executive Officer, Kitsap County Association of REALTORS®  
[andrew@kitsaprealtor.org](mailto:andrew@kitsaprealtor.org)

]

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Nathan Catey  
Director of Government Affairs, Kitsap County Association of REALTORS®  
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Nicola D'Anella  
Chair of Government Affairs Committee, Kitsap County Association of REALTORS®  
[nicola@washbern.com](mailto:nicola@washbern.com)

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

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March 25, 2024

Kitsap County Board of Commissioners  
Commissioner Rolfes  
Via email: [crolfes@kitsap.gov](mailto:crolfes@kitsap.gov)

Commissioner Walters  
Via email: [kwalters@kitsap.gov](mailto:kwalters@kitsap.gov)

Commissioner Garrido  
Via email: [cgarrido@kitsap.gov](mailto:cgarrido@kitsap.gov)

Dear County Commissioners,

Thank you for the opportunity to comment on the proposed changes to the Kitsap County Comprehensive Plan, Development Regulations, Capital Facilities, and the environmental impacts of these decisions. The Port Gamble S'Klallam Tribe has been engaged in the update process from the very beginning and has submitted three letters, an addendum, and testified at public hearings many times. We appreciate the conversations that we have had with your staff about this important topic, and our comments below are a continuation of concerns already laid out to county staff, Planning Commissioners, and through a March government-to-government consultation with Commissioner Rolfes. Thank you for your consideration of the comments below.

**Port Gamble S'Klallam Tribe's Treaty Right Interests**

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

Fish and fish habitat are crucial to the cultural, spiritual, subsistence and commercial activities of the Port Gamble S'Klallam Tribe. According to S'Klallam oral traditions, ancestral Port Gamble people lived in the area of the level, sandy spit on the west shore of the mouth of Port Gamble Bay. Like other Washington treaty tribes, the S'Klallam people relied on their fisheries for much of their food supply, pre-dating the signing of the treaty by thousands of years. The tribes used all available species of fish, including all six species of salmon, herring and other smaller fish, and shellfish. Tribal customs and traditions reflected the importance of the fisheries by proscribing waste, regulating distribution of the catch, and discouraging water pollution. The annual First Salmon ceremony expressed the people's appreciation for their harvest. Trade in fish was a major element of the tribal economy, and the tribes developed a



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31912 Little Boston Rd. NE – Kingston, WA 98346

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vibrant cultural life based on the wealth of their fisheries.

In addition to rich fisheries, the waters surrounding the area offered the Tribe an easy means of travel. Each summer the S'Klallam dispersed by canoe to camps where they fished and met family and friends. The Treaty reserved to the S'Klallam the right to take fish at all these “usual and accustomed grounds and stations” (U&A)—an area that sweeps from the westernmost point of the Strait of Juan de Fuca north into the San Juan Islands, south through Admiralty Inlet and all of the Hood Canal. Within these areas the Port Gamble S'Klallam and other tribes that share the U&A are entitled to take half the harvestable fish and shellfish and retain the right to access private property to fish and to shellfish.

Today, 169 years after signing the Treaty of Point No Point, the Tribe retains deep cultural and economic ties to the surrounding waters and to their fisheries. More than a century of federal court decisions have fleshed out the components of the treaty right, including the right of access to places, the right to a share of harvest to meet tribal moderate living needs, and the right to protection of fish habitat in all areas of the Tribe's U&A. More than 150 tribal members earn all or a portion of their livelihood working as commercial finfish and shellfish fishers (PGST 2020 survey). Subsistence harvests from the Tribe's U&A are a key element of the diet of many tribal members, as of the 2020 survey, there are about 300 subsistence finfish and shellfish fishers that rely on the availability of these historic food sources to feed themselves and their family. In addition, the Tribe conducts fisheries in its U&A to obtain fish for ceremonial use.

### **General Comments**

We recognize that this Comprehensive Plan update will incorporate significant changes. A new Climate Change Element is included in the draft. A different approach to growth will be needed to accommodate the population, housing units, employment, and protection and enhancement of the environment for the next 20 years. Some key components missing from the Comprehensive Plan and Development Regulations include ecosystem connectivity/wildlife corridors, urban forestry, planting of trees, retention/protection of rural forests, and wildland urban interface. Specific comments below offer the Tribe's requested changes to the Land Acknowledgement and some suggestions for Ecosystem Connectivity and Urban forestry, which are borrowed from Pierce County. Additional comments are provided for the Environment and Climate Change Elements and development regulations. We understand there will be continued discussion related to the rural element, character, and development patterns and we look forward to working with you on those hard topics.

### **Land Acknowledgement:**

Kitsap County is located on 396 square miles of land within the ancestral territory of the suq̓wabš “People of Clear Salt Water” (Suquamish Tribe) and the Nux Sklai Yem “the Strong People” (Port Gamble S'Klallam Tribe) and other tribes. The Suquamish people live in harmony with the lands and waterways along Washington's Central Salish Sea as they have for thousands of years.





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The ~~Port Gamble S'Klallam~~ *nəx<sup>w</sup>qíyt nəx<sup>w</sup>s'káyám* people are the living descendants of the Salish people who have been well established in these lands since time immemorial. the Puget Sound basin and surrounding areas since 2400 B.C. The Port Gamble S'Klallam Tribe along with their sister tribes, the Lower Elwha Klallam and Jamestown S'Klallam, hold a deep historical connection and legacy of respect for the land and natural resources. ~~In Kitsap County, the Suquamish and the Port Gamble S'Klallam people live on and protect the land and waters of their ancestors for future generations as guaranteed by the Point Elliott and Point No Point Treaties of 1855. In addition, T~~the Treaty of Point No Point of 1855 ~~ensures that the Jamestown S'Klallam, Skokomish, and Chimakum People maintain~~ their sovereign hunting, fishing, and gathering rights on “usual and accustomed” grounds which include land and waterways within Kitsap County. ~~With a deep historical connection and legacy of respect for the land and natural resources, t~~These Tribal nations enrich Kitsap County through environmental stewardship, cultural heritage, and economic development, as well as collaboration with local governments to shape Kitsap County's future. You are encouraged to reach out to learn more about the Strong People in this area. Visit <https://pgst.nsn.us>.

Land Use Element:

Pg. 18 Table 1.5: Remove the Rural Residential Zone. Maintain existing 5 acre lots but allow no more. This zone has the biggest developmental pressure in Kitsap County and one of the highest environmental costs.

Pg. 33

Land Use Policy 6.2. Actively integrate amenities ~~such as~~ for open space, including trails, plazas, tree canopies, wildlife corridors, and pedestrian features within urban growth areas.

Land Use Policy 6.5. Actively seek new opportunities for public waterfront access, and restoration of waterfront properties, especially in support of the Kitsap Peninsula Water Trails system, while preserving and connecting to existing public waterfront access.

Pg. 55 Land Use Goal. Forest resource lands

Aggressive expansion and enhancement of rural and urban forest cover and forest health is essential. King County is implementing the Land Conservation Initiative, which is a regional collaboration to conserve the last, most important natural lands and urban green spaces in King County between 2016 and 2050. It calls for a series of accelerated actions to address rapidly shrinking open spaces and climbing land prices. The initiative has identified approximately 20,000 acres of forest land. A second strategy is the 30-Year Forest Plan, which was developed with Indian tribes, nonprofits, and others as a strategy to expand and enhance rural and urban forest cover and forest health between 2021 and 2051. See 2024 King County Comprehensive Plan (DRAFT) Rural Areas and Natural Resource Lands Line 403 Page 3-12.

Pierce County has a new Urban Forestry section, goal, and policies in the DRAFT Comprehensive Plan Open Space Element Pg. 7.

Land Use Policy 19.5 Adopt and maintain a forestry plan to preserve and enhance the tree canopy in a way that equitably distributes to residents the benefits that trees can provide, especially urban heat island mitigation.

Land Use Strategy 19.5.a Coordinate forestry plans with other open space planning efforts to



provide overlapping benefits where practicable, such as improving riparian habitat corridors and improving water quality by lowering temperatures due to increased shading.

Land Use Strategy 19.5.b Identify and implement an achievable rural and urban tree canopy coverage target based on existing conditions, planned land uses, and the work of KNRAMP.

Land Use Strategy 19.5.c Enhance tree canopy in rural and urban areas by identifying underserved communities.

Land Use Strategy 19.5.d Work with landowners and businesses to develop strategies to support rural and urban tree canopy goals.

### Environment Element

Pg. 69

Kitsap County strives to treat its environment as an asset. Adjacent to Puget Sound and Hood Canal, the county includes 216 miles of marine shorelines. The county is part of Water Resource Inventory Area (WRIA) 15 located within the usual and accustomed places for the Port Gamble S'Klallam- Tribes. The WRIA and includes 1,000 miles of streams, numerous wetlands, lakes, and estuaries. Kitsap County's landscape is varied, with large areas of forested land cover including second and third growth trees.

Pg. 71 Key Terms

**Net ecological gain** means that after development, there is an increase in biodiversity or resilience that improves the delivery of valued ecosystem functions in the affected ecosystem.

Pg. 70

Kitsap County works with area Tribes, agencies, and other groups to protect important natural environments ~~prioritized~~ protected by tribal treaty rights.

Pg. 72

**Environment Strategy 1.b.** Coordinate an improved development planning and review system that ~~maintains~~ improves the ~~ecological~~ functional ~~and~~ values of the natural environment while meeting Growth Management Act requirements for land use, capital facilities, housing, protection of critical areas, and economic development.

**Environment Strategy 1.e.** Establish permanent funding and ~~Seek~~ additional funding opportunities to protect and restore natural systems.

**Environment Strategy 1.f.** Develop development standards ~~or programs~~ and design guidelines that protect tree canopy in urban and rural areas.

### Ecosystem Connectivity

Kitsap County contains varied terrestrial and aquatic ecosystems including lowland riparian areas and wetlands, oak savannas and prairies, old-growth forests, and alpine meadows. These varied habitats host numerous different plant and animal species throughout the County. Ongoing development within and outside of the UGA boundaries has contributed to continued habitat degradations.



Ecosystem Connectivity is key to promoting resilience to stressors from development, a changing climate, and to allow for fish and wildlife migration. Kitsap County will map biodiversity networks to connect biologically rich areas and corridors that are critical for wildlife conservation. They will be documented in a series of Biodiversity Plans. The Biodiversity Plans are not regulatory documents but are used to inform planning efforts on the location and boundaries of open space corridors.

Aquatic habitats include Freshwater Wetlands & Fresh Deepwater, Instream, and Puget Sound Nearshore habitats. Aquatic ecosystems provide many essential services to our communities including clean water for drinking and recreation, fishery and aquaculture industries, and resources guaranteed in treaties to tribal nations.

Kitsap County's waterways support several species, including nine fish species of local importance and three salmonoids protected under the Endangered Species Act (ESA).<sup>29</sup> The decline of wild salmonoids throughout Kitsap County and the Pacific Northwest has been well studied. It has been attributed to toxic runoff including 6PPD quinone (tire dust) and widespread loss and degradation of habitat, due to hydropower, temperature increases in streams linked to climate change, and forestry.

The protection and recovery of listed salmonoid species will continue to be a priority for Kitsap County due to their significance to tribes, local and regional character, salt and freshwater ecosystems, and recreational and commercial fisheries.

The Puget Sound Partnership is Washington State's designated regional salmon recovery organization for the Puget Sound regions, and it supports the work that Salmon Recovery Lead Entities do at the local level to develop strategies to protect and restore salmon habitat. At the Regional scale, the Puget Sound Salmon Recovery Plan (2007) guides recovery work.

Lead Entities coordinate salmon recovery efforts in one or more WRIA's, and write and facilitate the implementation of salmon recovery strategies at the watershed level. Two Lead Entities work within Kitsap County:

- Hood Canal Recovery Lead Entity (WRIA 15)
- West Sound Partners for Ecosystem Recovery (WSPER) (WRIA 15)

Each lead entity has a standalone salmon recovery strategy, some of which are also chapters of the ESA Recovery Plans for Chinook and Steelhead. These plans guide where state and federal money is spent to maximize the impact public investments have in producing habitat capable of sustaining healthy salmon populations. Lead entities are established in law (RCW Chapter 77.85) and are funded by the Washington State Legislature and the federal government through the Salmon Recovery Funding Board. Some lead entities also receive funding from other organizations.

Local Integrating Organizations (LIOs) are forums that collaborate on science-based, community-supported strategies to protect and restore Puget Sound ecosystems. They are considered the experts on ecosystem recovery and members generally include elected officials, tribal staff, city and county government staff, non-profits, interest groups, citizens, and educational organizations.

LIOS develop and implement Ecosystem Recovery Plans. These voluntary stewardship plans establish Watershed-scale priorities and actions for Puget Sound recovery. They were funded by the US EPA through the Puget Sound Partnership.





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There are two LIOs who work within Kitsap County's boundaries:

- Hood Canal Coordinating Council
- West Sound Partners for Ecosystem Recovery

Ecosystem Recovery Plans represent Kitsap County's priorities for ecosystem recovery efforts and direct National Estuary Program funding from the EPA. Kitsap County will reference these plans to guide engagement and decision making for ecosystem protection, restoration, and recovery in the watershed, and local priorities for funding.

Watershed Councils were established by the Watershed Planning Act of 1997 and promote stewardship of their watersheds. Across the Puget Sound there are varying structures and relationships between the watershed groups.

**Environment Goal X.** Identify, protect, and enhance terrestrial and aquatic ecosystems so that they maintain viable, reproducing populations of plants and animals.

ENVIRONMENT STRATEGY-X.1 Coordinate ecosystem restoration strategies with tribal, federal, state, and local jurisdictions, countywide planning groups, and watershed groups in watersheds regulated or managed by the County.

ENVIRONMENT STRATEGY-X.2 Incentivize the conservation of lands that represent the highest level of biological diversity and restore connectivity between protected areas to promote conservation of these ecosystems and foster climate resilience.

ENVIRONMENT STRATEGY-X.3 Coordinate with state and federal partners to evaluate long term cumulative impacts to watershed hydrology, including the provision of sufficient streamflow for salmonids, and identify mitigation options.

ENVIRONMENT STRATEGY-X.4 Promote urban forests through tree planting programs; maintenance of large healthy trees in parks, residential, commercial, and industrial areas; increase education and awareness, and through the protection and restoration of forest ecosystems.

ENVIRONMENT STRATEGY-X.5 Maximize ecological benefits and climate resiliency of aquatic ecosystems through the implementation of recommendations of salmon recovery and other ecosystem recovery plans, as appropriate.

ENVIRONMENT STRATEGY-X.6 Assess recommendations of approved Lead Entity salmon recovery plans and Ecosystem Recovery Plans to inform updates to County plans and development regulations.

ENVIRONMENT STRATEGY-X.7 Work with tribal, public, and private sector partners to restore the functions of streams and floodplains to improve the resilience of aquatic ecosystems and reduce flood risk.

ENVIRONMENT STRATEGY-X.8 Work with tribal, public, and private sector partners to remove physical barriers to fish movement and migration to restore aquatic ecosystems and protect tribal treaty rights.



Pg. 73

**Environment Strategy 1.m.** Establish and implement a monitoring and evaluation program to determine the effectiveness of restoration, enhancement, and recovery strategies for ESA-listed species and for species of tribal significance including salmon, wildlife, culturally significant vegetation and trees, and the habitat necessary for continuation of the species for the next seven generations.~~and other species of tribal significance.~~

Pg. 77

Support the Kitsap Public Health Department in enforcing existing state regulations regarding routine septic maintenance regulations through the expansion of an operation and maintenance program.

#### Development Regulations

Pg. 12 KCC 17.120.010

Remove Rural Residential Zone Classification.

Page 30 KCC 17.420.052:

Remove Rural Residential Zone, Increase density from 1 to 5 for UR and GB Zones.

Pg. 31

Add a maximum impervious surface coverage for RR of 5%.

Pg. 64 KCC 17.495.010

This Section shall establish tree replacement standards for properties undergoing development to promote tree canopy conservation in the urban land use zones of Kitsap County. A healthy tree canopy contributes to physical and mental health, safety, aesthetics, and overall welfare of the public. Trees also mitigate the negative effects of ~~urban~~ development including the loss to native wildlife biodiversity, increased temperatures, airborne particulates, carbon dioxide, noise, and stormwater runoff caused by increases in impervious surfaces and vehicular traffic.

Pg. 68 KCC 17.495.050.C

Protection fencing and other tree and soil protection measures, per Best Management Practices, shall be shown on the Plan when clearing and grading is proposed ~~within the critical root zone of retained trees on a site that will retain trees.~~

Pg. 68 KCC 17.495.060.A

Trees to be retained shall have readily visible temporary protection at their approved critical root zones or drip line, which ever provides the most protection.

Add drip line to remainder of code provisions to ensure proper protection of trees during construction.

Title 21

No changes are proposed in Title 21, however, this title directly affects how development projects are reviewed and the ability for the tribe to assert sovereign treaty rights onto a development that will directly impact fish and wildlife habitat functions and values.



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- Critical Area Buffer Reduction-Remove the Type I option. Any buffer reduction should require consultation with tribes. Critical areas such as wetlands, floodplains, and fish and wildlife habitat conservation areas are locations that support reserved tribal treaty rights to culturally significant and subsistence harvest of species and habitats.
- Shoreline Buffer Reduction-Remove the Type I option. Any shoreline buffer reduction should require consultation with tribes. These are areas of significant importance for the protection of reserved tribal treaty rights.
- Zoning Variance-Administrative- Modify Zoning Variance >10% - < 25% to Hearing Examiner review.
- Zoning Variance – Hearing Examiner > 25%-Remove any variance option greater than 25%. Changes beyond 25% of a standard is unacceptable and speaks to the fact that something is wrong with code provisions or development practices to necessitate this standard.

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

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

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

Thank you for considering our comments.

Sincerely,

Marla Powers,  
Environmental Planner  
Port Gamble S'Klallam Tribe

[Return to Comment Matrix](#)

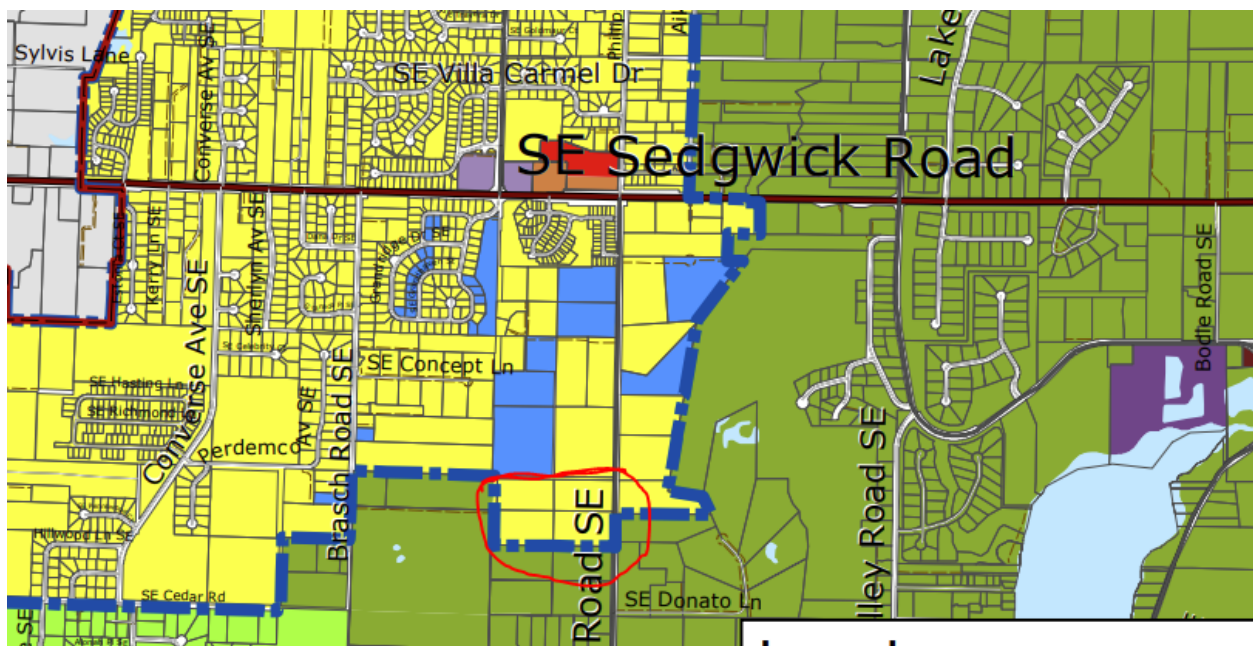


March 26, 2024

To: Kitsap County Planning Commission

RE: Kitsap County Comprehensive Plan – Preferred Alternative

This letter is in support of the inclusion of parcel #'s 072302-3-033-2005, 072302-3-037-2001, 072302-3-034-2004 and 072302-3-038-2000 into the Port Orchard UGA. These parcels were applied for in the summer of 2022 to be included in the expanded UGA. They were included in one of the three study alternatives developed by staff last summer (Alternative 3), circled in red below:



However, these properties have not been included in the preferred alternative that is before the Planning Commission today. The properties make complete sense for inclusion into the UGA to provide much needed housing capacity for Kitsap County. The owners of these properties also own the property immediately to the north that is currently inside the UGA. Unfortunately, the property inside the UGA has serious environmental constraints that make development challenging so it is not providing true “buildable land” capacity to meet the county’s future housing needs. By including these four parcels into

the UGA you can create 70-100 new single family homesites that will be supported by current infrastructure while protecting the stream corridor and providing open space at the same time. Additionally, this proposal will match the characteristics of development within and surrounding the immediate area.

Under the state Growth Management Act (GMA), and Kitsap County's countywide planning policies, these properties should be included in the UGA for the following reasons:

- To provide diverse housing options and the opportunity for residents to own homes in difficult market circumstances, where developable space is limited. (The county has acknowledged the urgent need for housing.)
- It's a logical extension of Urban Growth Boundary (These parcels are directly adjacent and contiguous to the current Port Orchard UGA and Urban Low Density Residential zone.)
- Utilization of existing infrastructure (Infrastructure such as water and sewer are already in place to serve these parcels.)
- The proposed new home development will support the economic growth and development of the community.
- This proposal will provide for the protection of critical areas.
- This proposal will create an opportunity to maintain open space in protected areas.

Sincerely,

**Matt Lewis**  
**President - GCH**  
Garrette Custom Homes  
Email: [MattL@buildgch.com](mailto:MattL@buildgch.com)  
Direct: 253-904-3676  
[www.GarretteCustomHomes.com](http://www.GarretteCustomHomes.com)

*"Our Mission is to deliver an exceptional new home experience"*

[Return to Comment Matrix](#)





# Apex Airport Compatibility Zones

[Return to Comment Matrix](#)



0 0.125 0.25 0.5 Miles

06/15/2021







Keyport Improvement Club  
PO Box 575  
Keyport, Washington 98345

March 28, 2024

To Whom It May Concern:

We appreciated Eric Baker's presentation to Keyport residents on 11/30/23 to present changes to Keyport's section of the Comprehensive Plan Update. The presentation spurred conversations in town – especially about supporting efforts of an aging population to age in place. I'd like to share feedback I've heard from Keyport residents.

- **Public transportation** remains an important missing element in Keyport – a concern that we share with the smaller communities throughout Kitsap County. We cannot demonstrate demand when we have no service. We voiced our concern to Kitsap Transit when they were working on their 20- year plan, which left out Keyport for service, in addition to Olalla, Seabeck, Brownsville, Hansville, and other small communities. We received no response. We remain troubled by the lack of service and strongly recommend finding a way to provide a feeder service similar to Bainbridge's Dial-A-Ride from smaller communities to Kitsap Transit's scheduled routes. This change would support seniors and citizens in any age group who do not have a car.
- **Housing prices and availability** are a challenge for renters and homeowners alike. We strongly encourage streamlining the process for permitting and building housing in Kitsap County, especially for smaller affordable residences. We ask that the Department of Community Development make the permitting process timely and efficient to expedite easing building affordable housing. Our town was platted over 100 years ago with small lots, so setbacks from streets and parking requirements have derailed projects that would fit our neighborhood's density.
- **Incentivize building smaller dwellings** built to universal design standards. As people age and want to downsize to a more manageable house or apartment, we need more accessible, one level options. Again, please reconsider parking requirements and allow garages to be counted as parking.
- **Support improving Kitsap's medical care.** We are alarmed by reports from neighbors about long waits to get into Saint Michaels' emergency room, days of boarding in the ER because hospital beds are full, Medicare patients unable to find a primary care doctor, long-term care facilities short on caregivers. We strongly support our county government working cooperatively with other agencies and the private sector to strengthen our local health care system. Workforce development

with Olympic College and local high schools is a place to start. Such a complicated problem requires cooperation from many sectors.

- **Encourage civic involvement.** Support developing and maintaining parks and community centers. Gathering places make it possible to organize activities and events, which strengthen communities. Continue to offer online options for attending county meetings to make it easier for citizens to stay involved.

Thank you for your efforts to improve our county. We know these goals are aspirational, and we appreciate sharing our ideas. We love our town and work every year to make it a better place to live.

Sincerely,

A handwritten signature in black ink that reads "Karol Stevens". The script is fluid and cursive, with the first name "Karol" and last name "Stevens" clearly distinguishable.

Karol Stevens  
President

[Return to Comment Matrix](#)





## Skokomish Legal Department

N. 80 Tribal Center Road

Tel: 360.877.2100 ext. 2071

Skokomish Nation, WA 98584

Fax: 360.877.2104

March 27, 2024

Kitsap County Commissioners

614 Division St. MS-4

Port Orchard, WA 98366

Emailed request to: [kitsapcommissioners@kitsap.gov](mailto:kitsapcommissioners@kitsap.gov); [compplan@kitsap.gov](mailto:compplan@kitsap.gov)

**Re: Kitsap County Comprehensive Plan Update - Government-to-Government Consultation Request to address Skokomish Economic Development Project – Reclassification & Urban Growth Area Designation**

Dear Kitsap County Commissioners:

The Skokomish Indian Tribe seeks to open a government-to-government consultation regarding the Kitsap County Comprehensive Plan Update as it relates to the Skokomish Economic Development Projects located in Kitsap County. Reference materials are attached to this request. We hope to meet to discuss our concerns on or before April 3, 2024.

I may be called at 360.490.8959 during regular business hours to discuss the Tribe's request. I may also be contacted by email at [elees@skokomish.org](mailto:elees@skokomish.org).

Very truly yours,

Earle David Lees, Attorney and Director  
Skokomish Legal Department

Approved by:

Charles Miller, Chair  
Skokomish Tribal Council





# Skokomish Indian Tribe Government to Government Consultation Request for Kitsap County Comprehensive Plan Update

Supporting Documentation, March 27, 2024

The Skokomish Tribe writes this letter to strongly urge Kitsap County staff to reconsider the recommended zoning and urban growth area designation for parcels owned by the Tribe, located along State Route 3 (SR-3), directly adjacent to the City of Bremerton and Puget Sound Industrial Center - Bremerton (PSICB) Subarea Plan. These Subject Properties are shown in **Exhibit 1** and include:

- 1) Parcel Number **152301-4-013-1000**, consisting of 43.5 acres. This property is proposed for federal trust acquisition for the development of an entertainment complex, including casino, bowling alley, movie theater and restaurant space, hotel, and associated parking and infrastructure (Proposed Entertainment Complex). The Proposed Entertainment Center is projected to employ approximately 600 employees.
- 2) Parcel Number **152301-4-014-1009**, consisting of 3.26 acres. This property is proposed federal trust acquisition for development of a fueling / electric vehicle charging station, convenience store/deli, and associated parking and infrastructure (Proposed C-Store). The Proposed C-Store is projected to employ approximately 25 employees.

The Tribe has submitted applications to the U.S. Bureau of Indian Affairs for the trust acquisition of these properties so that the Tribe may develop them for economic purposes. The classification of the Tribe's properties for commercial development and inclusion within the Urban Growth Area may be necessary to allow the potential for municipal utilities to serve the properties. As demonstrated in the attached exhibits, on multiple occasions, the Tribe and/or the BIA have either informed, sought participation, or provided opportunities for the County to participate in these plans and associated environmental studies. Most recently, these efforts include the following:

- **Exhibit 2**, September 14, 2022: Letter from Tribal Staff to County staff, indicating that the Tribe is engaged in an economic development project and requesting that the properties be classified as "Urban High-Intensity Commercial/Mixed Use" to support the Tribe's future use of the parcels. This letter also requested amendments to the Comprehensive Plan language to acknowledge the Skokomish Tribe as a partnering jurisdiction.
  - *No County questions or engagement*
- November 17, 2022: Representatives of the Tribe attended an open house meeting for the Comprehensive Plan update at the Commissioners Chambers in Port Orchard. Mr. Lees informed County staff of the Tribes projects and inquired as to the status of the

Tribe's pending request for reclassification of its parcels. County staff acknowledged the request and expressed optimism for the projects.

- *No County follow-up outreach or concerns were communicated to the Tribe*
- **Exhibit 3**, September 29, 2023: Notices of Applications from the BIA informing the County of the Tribe's fee to trust requests and proposals to construct the Proposed Entertainment Complex on the 43-acre property, and C-Store Project on the 3.26-acre property and invitation to comment.
  - *No County response received.*
- **Exhibit 4**, December 26, 2023: Letter from the BIA inviting the County to participate as a cooperating agency for the Environmental Assessment (EA) for "*the Skokomish Indian Tribe's (Tribe's) application for a 43.5-acre fee-to-trust transfer and casino project in unincorporated Kitsap County, Washington adjacent to the City of Bremerton (see attached map). The proposal includes the development of an entertainment complex, including casino, bowling alley, movie theater and restaurant space, hotel, and associated parking and infrastructure.*"
  - *No County Response received.*
- **Exhibit 5**, January 28, 2024: Notice of Availability of Environmental Assessment and Finding of No Significant Impact, posted in the Kitsap Sun. The EA and FONSI were made publicly available at <http://www.skokomishea.com>, and describe the environmental effects of the development of the Proposed C-Store on the 3.26-acre property, as well as the WSDOT commercial access roundabout.
  - *No County comments received.*

Additionally, to further aid the County's consideration of this request, please find attached:

- **Exhibit 6**, Administrative Draft Environmental Assessment for Entertainment Complex. Note that this is a preliminary draft still under consideration by the BIA as the lead agency. In response to an invitation from the BIA, the Tribe accepted cooperating status for the EA, and thus was provided with a preliminary copy for review. Although this document is pre-decisional, we are providing a copy to the County as a courtesy, as it provides relevant background information to aid in the UGA designation request. We request that the County maintain this document as confidential. The County and the public will be notified by the BIA when the final version is approved for release.
- **Exhibit 7**, Documentation submitted by Tribe to demonstrate that much of the County, including the subject properties, lies within the Tribe's traditional territory.

The Tribe's development plans for these properties have been ongoing for several years and have included a lengthy and formal process with the Washington State Department of Transportation (WSDOT) to allow for commercial access of the property. WSDOT has granted the Tribe an access break at the subject property and has approved a roundabout intersection on SR 3 (current mainline). This planning was done in coordination with the proposed Freight Mobility corridor and realignment of SR 3 (see **Exhibit 8**). The approved access will facilitate public access to the adjacent property identified for Industrial Reclassification in the County's staff's recommendations, as well as the Tribe's own properties. The roundabout represents a

significant infrastructure investment that warrants consideration as part of the zone classification for the subject parcels.

In the March 26, 2024 presentation to the Planning Commission, the County staff proposed to the planning commissioners (page 9 of presentation), that UGA expansions should be limited to those that provide employment opportunities or support City annexation goals. The Proposed Projects would directly generate more than 600 employment opportunities. Further the project would bring the needed infrastructure to support growth and employment opportunities within the PSIC-B, including those properties within the Port of Bremerton, with whom the Tribe has met and shared development plans and discussed compatibility with the Port's own development plans.

The Skokomish Tribe is deeply concerned about the lack of engagement from the County in response to these critically important Economic Development Projects for the Skokomish Tribe. The Skokomish Tribe has spent many years and invested significant resources into the careful planning of these projects, which have the potential for significant benefits, not only to the Skokomish Tribe, but for the broader community, in an area that has long been planned for growth.

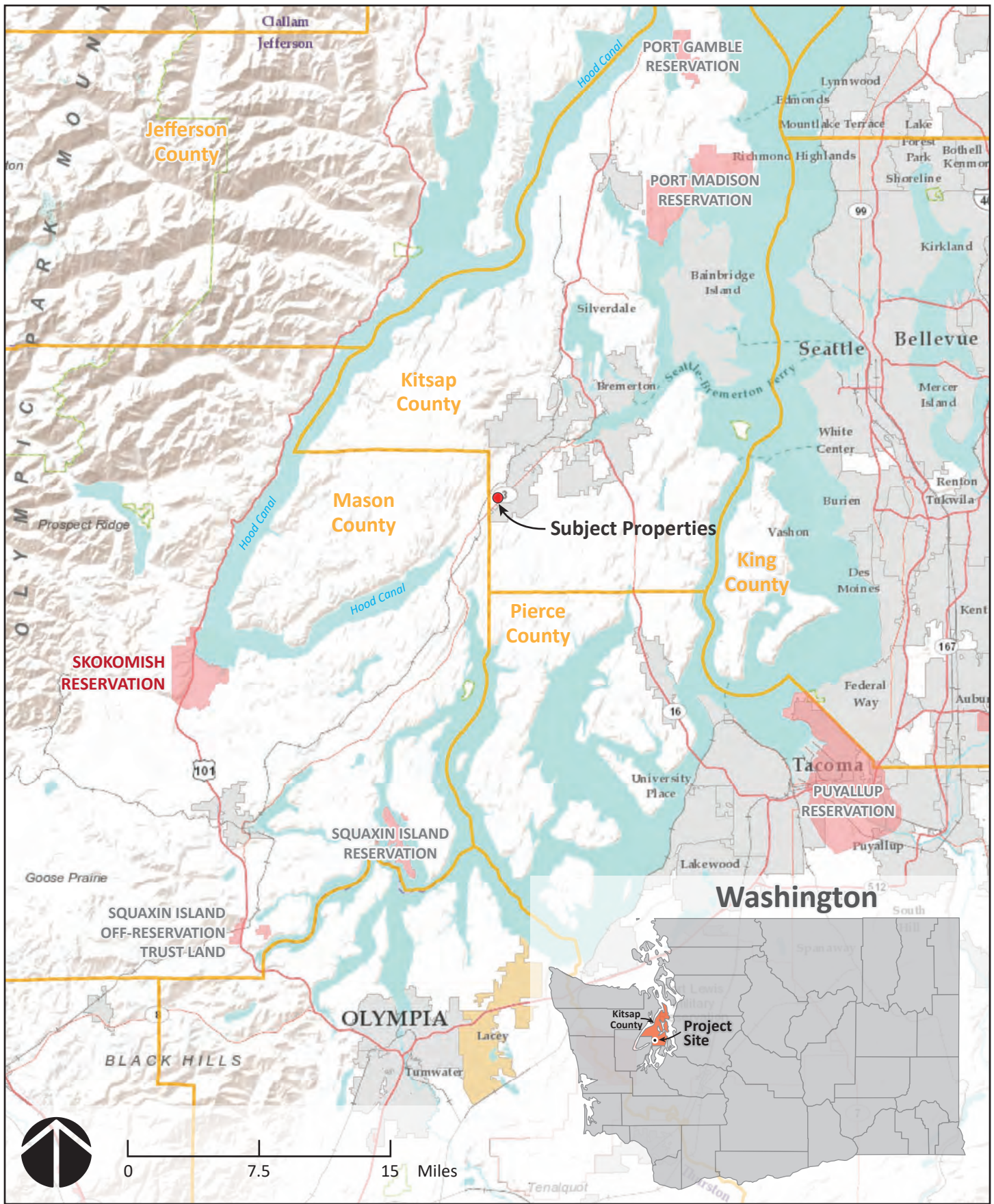
To that end, the Tribe is respectfully requesting government to governmental consultation with the County. The Skokomish Indian Tribe people (SqWuqWu'b3sh "people of the river") are the traditional inhabitants of the Hood Canal Basin within Kitsap County. A significant portion of Kitsap County, including the Tribe's properties, lies within the adjudicated territory of the Skokomish Tribe, as determined in the 1974 Boldt Decision, which established that "The usual and accustomed fishing places of the Skokomish Indians before, during and after treaty times included all the waterways draining into Hood Canal and the Canal itself." A map illustrating the boundaries of the Skokomish's U&A as defined by the Hood Canal drainage basin is provided in **Exhibit 7**. A settlement agreement between the Skokomish Tribe, Port Gamble Band of Klallam Indians, and other participating tribes is also provided in **Exhibit 7**, further acknowledging that the Hood Canal drainage basin is the undisputed traditional territory of the Tribe. This documentation should provide sufficient evidence for the County to acknowledge the Skokomish Tribe as the appropriate Native American consulting party for County actions within the northwestern portion of the County.

We respectfully request a response to this letter as soon as possible.



## Exhibit 1

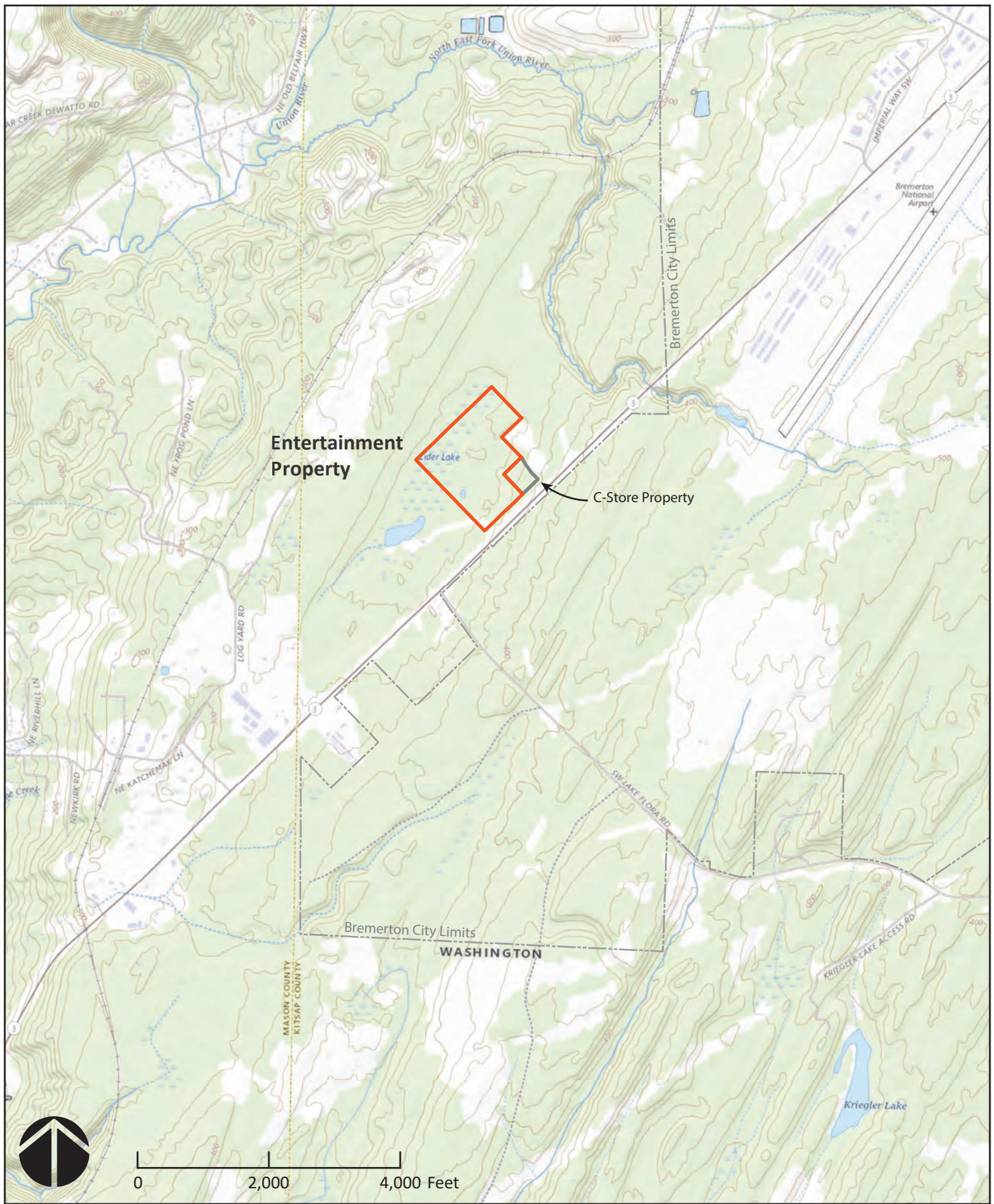
# Maps



Source: ESRI, USGS, NOAA

REGIONAL LOCATION

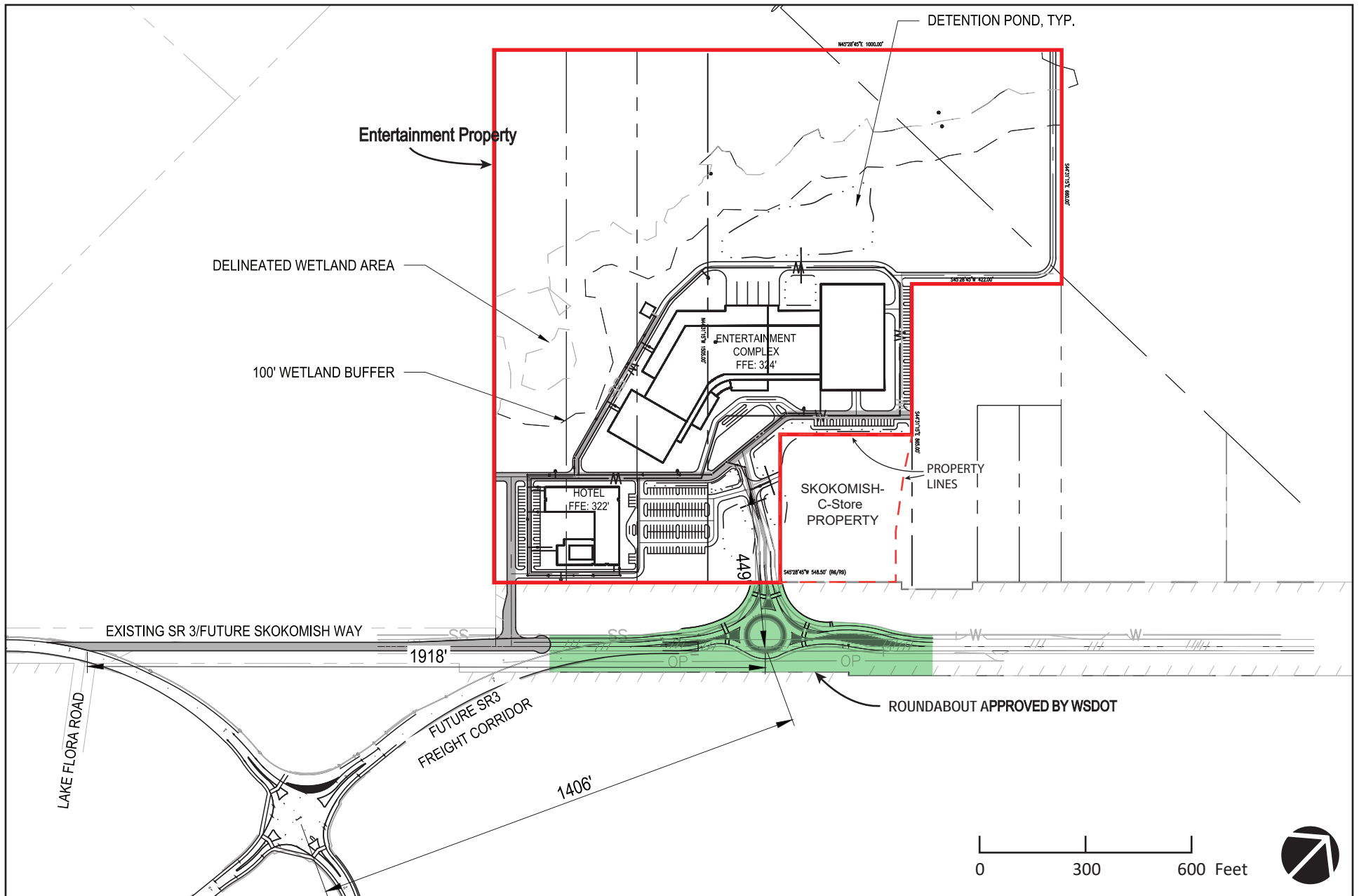




Source: USGS, Kitsap County

## SITE AND VICINITY





Source: Parametrix, 2022

Exhibit 2

Skokomish Tribe Letter  
Requesting Reclassification of  
Parcels as Part of  
Comprehensive Plan Update



## Skokomish Indian Tribe

80 North Tribal Center Road, Skokomish, WA. 98584 | P: (360) 426-4232 F: (360) 877-5943

September 14, 2022

Jeff Rimack, Director  
Kitsap County Department of Community Development  
619 Division Street  
Port Orchard, WA 98366

Dear Mr. Rimack,

The Skokomish Indian Tribe, as a neighboring jurisdiction, has lands and resources within Kitsap County and an overall vested interest in the development and management of the landscape. We have a working relationship with the County through our mutual participation on the Hood Canal Coordinating Council and our involvement in the development and implementation of natural and cultural resource protection and management codes, ordinances, and plans. We are currently engaged in an economic development project within the county and take this opportunity to provide input to the update of the *Kitsap County Comprehensive Plan*.

The Tribe requests changing the classification of parcels **152301-4-014-1009** and **152301-4-013-1000** from Rural Protection to Urban High-Intensity Commercial/Mixed Use. The Skokomish Tribe owns these parcels and we propose this change consistent with the immediate land uses and designations of nearby parcels.

The Skokomish parcels are in close proximity to the Puget Sound Industrial Center, designated as such to encourage development and provide for regional employment. Recent developments and proposals for redevelopment of land in the vicinity include Amazon warehouse and an automobile racetrack. Nearby Olympic Industrial Park continues to support industrial development. There are also numerous gravel pits within the immediate vicinity (see attached graphic).

The Port of Bremerton is located across State Route 3 from the Skokomish parcels. The Port lands are industrial in nature and use and compatible with an urban industrial designation for the Skokomish parcels. Further, the Port of Bremerton properties are within the City of Bremerton Urban Growth Area.



WSDOT has recognized the area between Gorst and Belfair as a key Freight Corridor, and is working on improvements to the existing SR 3 route through this area, to support the safe and efficient movement of goods. The Tribe has worked with WSDOT on identifying appropriate access location and access breaks in SR 3 to support the Tribe's future use of the parcels. The realignment of SR 3 and the new Freight Corridor literally – and by design - intersect at the Tribe's parcels.

The parcels are adjacent to future utility corridors for water and sewer, from the City of Bremerton and Mason County, respectively. The planned presence of urban facilities indicates growth for this area.

The Tribe is committed to ensuring the protection of critical habitats on these parcels, through use of a buffer and setback area along high-quality wetlands. This designation and protection ensures that the ecological function standards intent of the Rural Protection continues to be met.

Please note the inclusion of the Skokomish Tribe as a partnering jurisdiction in the Transportation Strategies section Strategy 4 on page 73.

***Strategy 4 – Coordinate with Neighboring Jurisdictions***

*Supports policies 8, 9, 11, 17, 33*

*Partnerships: Kitsap County is home to two Tribal governments, the Suquamish Tribe located in the community of Suquamish, and the Port Gamble/S'Klallam Tribe. The Skokomish Tribe has holdings in Kitsap County and is also a partnering jurisdiction. The County is responsible for roads within the Tribal borders and works with Tribal staff on issues of maintenance, improvements, non-motorized connections and safety. The county welcomes this strategic partnership and will continue to engage Tribal staff in matters pertaining to the reservations and lands owned by the Tribes.*

Thank you for your attention to these proposed changes to the *Kitsap County Comprehensive Plan*. Please contact me if you have any questions ([jpavel@skokomish.org](mailto:jpavel@skokomish.org), cell (360) 490-7954)

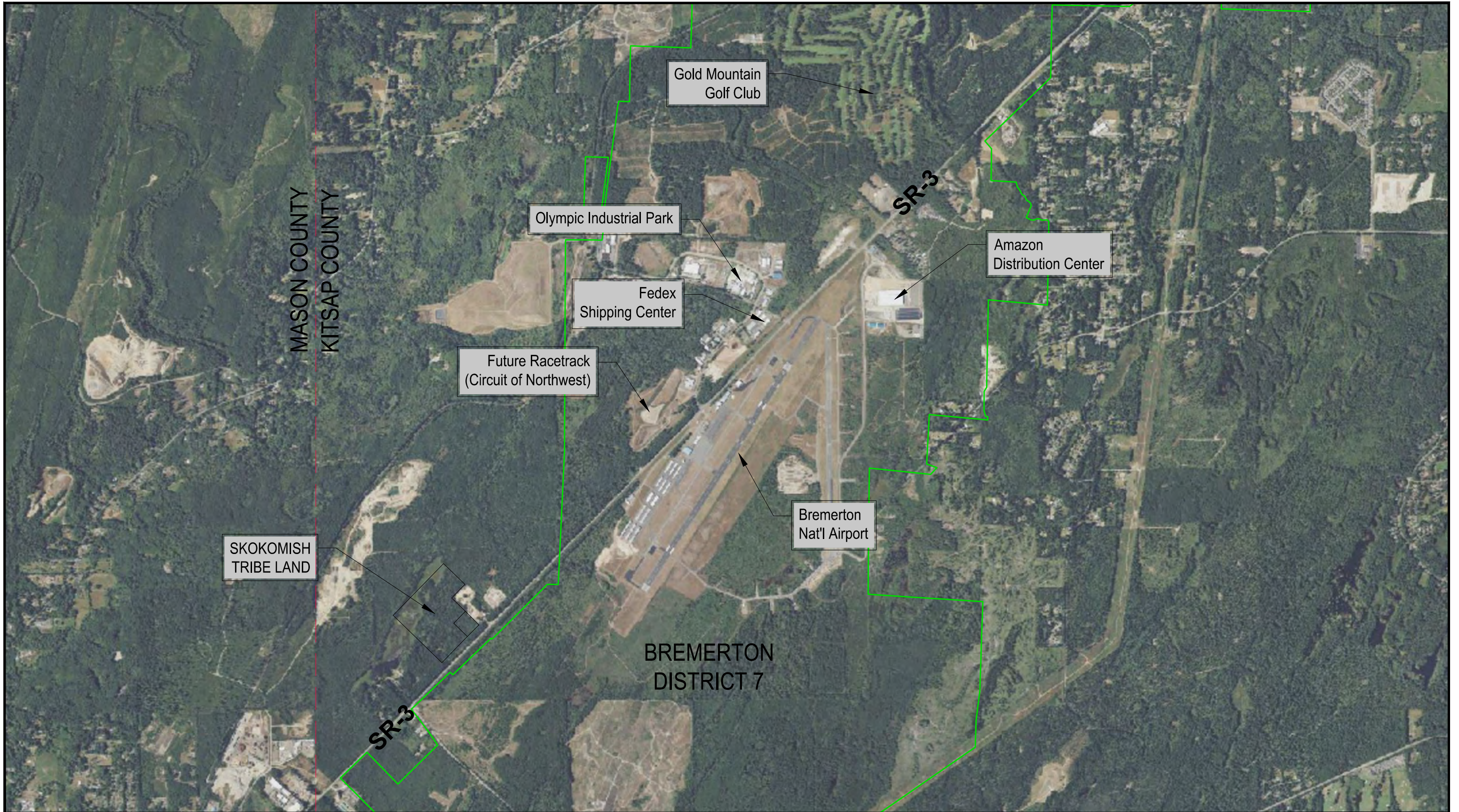
Sincerely,



Joseph Pavel, Director  
Skokomish Natural Resources

attachment





**SKOKOMISH ECONOMIC DEVELOPMENT  
REGION - SEPTEMBER 2022**



Exhibit 3

## BIA Notice of Applications





## United States Department of the Interior

### BUREAU OF INDIAN AFFAIRS

Northwest Regional Office

911 Northeast 11<sup>th</sup> Avenue

Portland, Oregon 97232

IN REPLY REFER TO:  
**Division of Realty**

Case Number: 52059

### **NOTICE OF GAMING LAND ACQUISITION APPLICATION**

Pursuant to the Code of Federal Regulations, Title 25, INDIANS, 151.11 Off-Reservation, notice is given of the application filed by the Skokomish Indian Tribe to have real property accepted "in trust" for said applicant by the United States of America. The determination whether to acquire this property "in trust" will be made in the exercise of discretionary authority which is vested in the Secretary of the Interior, or his authorized representative, U.S. Department of the Interior. To assist us in the exercise of that discretion, we invite your comments on the proposed acquisition. In order for the Secretary to assess the impact of the removal of the subject property from the tax rolls, and if applicable to your organization, we also request that you provide the following information:

- (1) If known, the annual amount of property taxes currently levied on the subject property allocated to your organization;
- (2) Any special assessments, and amounts thereof, that are currently assessed against the property in support of your organization;
- (3) Any governmental services that are currently provided to the property by your organization; and
- (4) If subject to zoning, how the intended use is consistent, or inconsistent, with the zoning.

We provide the following information regarding this application:

**Applicant:**

Skokomish Indian Tribe

**Legal Land Description/Site Location:**

See "Exhibit A" for legal descriptions.

**Project Description/Proposed Land Use:**

An entertainment complex, including a 55,000-square foot casino with approximately 1,000 gaming positions (920 Class III and Class II gaming positions, and 12 table games with approximately 6 positions each), 18-lane bowling alley, 5-screen movie theater, and restaurants, as well as a separate 120-room hotel and three-level parking garage.

As indicated above, the purpose for seeking your comments regarding the proposed trust land acquisition is to obtain sufficient data that would enable an analysis of the potential impact on local/state government, which may result from the removal of the subject property from the tax roll and local jurisdiction.


This notice does not constitute, or replace, a notice that might be issued for the purpose of compliance with the National Environmental Policy Act (NEPA) of 1969.

Your written comments should be addressed to the Bureau of Indian Affairs office listed at the top of this notice. Any comments received within thirty days of your receipt of this notice will be considered and made a part of our record. You may be granted one thirty day extension of time to furnish comments, provided you submit a written justification requesting such an extension within thirty days of receipt of this letter. Additionally, copies of all comments will be provided to the applicant for a response. You will be notified of the decision to approve or deny the application.

If any party receiving the enclosed notice is aware of additional governmental entities that may be affected by the subject acquisition, please forward a copy to said party.

A copy of the application, excluding any documentation exempted under the Freedom of Information Act (FOIA), is available for review at the above address. A request to make an appointment to review the application, or questions regarding the application, may be directed to the Northwest Regional Office attention: Theresa Cavasos, Realty Specialist, (503) 231-2237.

Sincerely,



Digitally signed by  
BRYAN MERCIER  
Date: 2023.09.29  
09:38:47 -07'00'

Bryan Mercier  
Northwest Regional Director

Enclosure(s)

CC:

**BY CERTIFIED MAIL:**

Kitsap County Commissioners  
619 Division Street MS34  
Port Orchard, WA 98366

Certified Mail ID: 70151520000267238779

Governor of Washington State  
Post Office Box 40002  
Olympia, Washington 98504-0002

Certified Mail ID: 70151520000267238762

City of Bremerton  
345 6<sup>th</sup> Street Suite 100  
Bremerton, Washington 98337

Certified Mail ID: 70151520000267238106

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**First Class Mail**

Skokomish Legal Department  
Attn: Earle David Lees  
N. 80 Tribal Center Road  
Skokomish, Washington 98584



Case Number: 52059  
Applicant Name: SKOKOMISH INDIAN  
TRIBE

## LEGAL DESCRIPTION EXHIBIT A

**Tract ID:**

**Tract Name: DUHELAP PROPERTY**

<u>Land Area</u>	<u>Land Area Name</u>	<u>Tract Number</u>	<u>LTRO</u>	<u>Region</u>	<u>Agency</u>	<u>Resources</u>	
120	SKOKOMISH		PORTLAND, OR	NORTHWEST REGIONAL OFFICE	PUGET SOUND AGENCY	Both (Mineral and Surface)	
<u>Section</u>	<u>Township</u>	<u>Range</u>	<u>State</u>	<u>County</u>	<u>Meridian</u>	<u>Legal Description</u>	<u>Acres</u>
15	023.00N	001.00W	WASHINGTON	KITSAP	Willamette		43.520

METES AND BOUNDS: PARCEL A: RESULTANT PARCEL A, OF LOT COMBINATION AND BOUNDARY LINE ADJUSTMENT RECORDED UNDER KITSAP COUNTY AUDITOR'S FILE NO. 202105170394, BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS: THAT PORTION OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER, THE NORTHWEST QUARTER OF THE SOUTHEAST QUARTER, THE SOUTHWEST QUARTER OF THE SOUTHEAST QUARTER, THE NORTHEAST QUARTER OF THE SOUTHWEST QUARTER, THE SOUTHEAST QUARTER OF THE SOUTHWEST QUARTER, AND THE SOUTHEAST QUARTER OF THE NORTHWEST QUARTER OF SECTION 15, TOWNSHIP 23 NORTH, RANGE 1 WEST, W.M., KITSAP COUNTY, STATE OF WASHINGTON, DESCRIBED AS FOLLOWS: COMMENCING AT A POINT ON THE SOUTH LINE OF THE SOUTHEAST QUARTER OF THE SOUTHWEST QUARTER, SECTION 15, TOWNSHIP 23 NORTH, RANGE 1 WEST, W.M., IN KITSAP COUNTY, WASHINGTON, WHICH SAID LINE IS INTERSECTED BY THE CENTERLINE OF SR 3; THENCE NORTH 45°59'06" EAST, ALONG SAID CENTERLINE; 1,000 FEET; THENCE LEAVING SAID CENTERLINE, NORTH 44°00'54" WEST, 180.00 FEET TO A 5/8-INCH REBAR AND CAP, "PLS 27133", AT THE SOUTHWEST CORNER OF THAT PARCEL CONVEYED BY JOSEPH H. PEDEFERRI TO SKOKOMISH INDIAN TRIBAL ENTERPRISE (S.I.T.E, INC.) BY STATUTORY WARRANTY DEED, AUDITOR'S FILE NO. 201709010180, SAID POINT BEING THE TRUE POINT OF BEGINNING OF THIS DESCRIPTION; THENCE CONTINUING NORTH 44°00'54" WEST, 1,505.00 FEET TO A 5/8-INCH REBAR AND CAP, "PLS 27133" AT THE NORTHWEST CORNER OF S.I.T.E, INC. STATUTORY WARRANTY DEED, AUDITOR'S FILE NO. 201709010180; THENCE NORTH 45°59'06" EAST, 1,600.00 FEET TO A 5/8-INCH REBAR AND CAP, "PLS 27133" AT THE NORTHEAST CORNER OF THAT PARCEL CONVEYED BY POPE RESOURCES TO S.I.T.E, INC. BY BARGAIN AND SALE DEED, AUDITOR'S FILE NO. 201610190070; THENCE SOUTH 44°00'54" EAST, 660.00 FEET TO A 5/8-INCH REBAR AND CAP, "PLS 27133" AT THE MOST EASTERLY CORNER OF THAT PARCEL CONVEYED BY THOMAS W. JOHNSON AND THE ESTATE OF C.R. SCHILLINGER TO S.I.T.E, INC. BY STATUTORY WARRANTY DEED, AUDITOR'S FILE NO. 201512180162; THENCE. SOUTH 45°59'06" WEST, 422.00 FEET ALONG THE BOUNDARY OF SAID PARCEL, SAID LINE BEING CONTIGUOUS WITH THE NORTH LINE OF THAT PARCEL CONVEYED BY JESSIE L. RANDLE TO RICHARD AND ROBERTA DAVIS, BY STATUTORY WARRANTY DEED, AUDITOR'S FILE NO. 3202026; THENCE CONTINUING ALONG SAID S.I.T.E, INC. BOUNDARY, BEING CONTIGUOUS WITH THE WEST LINE OF SAID DAVIS DEED, SOUTH 44°00'54" EAST, 425.00 FEET; THENCE LEAVING SAID LINE, SOUTH 45°59'06" WEST, 370.68 FEET; THENCE SOUTH 44°00'54" EAST, 420.00 FEET TO THE NORTH RIGHT OF WAY LINE OF SR 3; THENCE SOUTH 45°59'06" WEST, ALONG SAID NORTH RIGHT OF WAY LINE OF SR 3, PARALLEL WITH AND 180 FEET DISTANT NORTHWESTERLY FROM THE CENTERLINE OF SAID SR 3, 807.32 FEET TO THE TRUE POINT OF BEGINNING SUBJECT TO AN EASEMENT FOR INGRESS AND EGRESS, OVER A STRIP OF LAND LYING NORTHWESTERLY OF THE NORTH RIGHT OF WAY OF SR 3 AND SOUTHEASTERLY OF THE FOLLOWING DESCRIBED LINE: BEGINNING AT A POINT WHICH BEARS NORTH 45°59'06" EAST, 1,000.00 FEET AND NORTH 44°00'54" WEST, 180.00 FEET FROM THE INTERSECTION OF THE SOUTH LINE OF THE SOUTHEAST QUARTER OF THE SOUTHWEST QUARTER, SECTION 15, TOWNSHIP 23 NORTH, RANGE 1 WEST, W.M., IN KITSAP COUNTY, WASHINGTON, WITH THE CENTERLINE OF SR 3; THENCE NORTH 45°59'06" EAST, ALONG A LINE PARALLEL WITH AND 210 FEET DISTANT NORTHWESTERLY FROM THE CENTERLINE OF SAID SR 3, 807.32 FEET TO THE TERMINUS OF THIS DESCRIBED LINE. CONTAINING 43.52 ACRES, MORE OR LESS

WDAEAD1

\*P ; P ; 10 ; 120 ; 4200401300 ; 52059 ; 120T000055\*  
Office Codes: P.P.10.120 AD Number: 4200401300 Case: 52059



United States Department of the Interior  
BUREAU OF INDIAN AFFAIRS  
PUGET SOUND AGENCY  
2707 COLBY AVE. SUITE 1101  
EVERETT, WA 98201-3528

IN REPLY REFER TO:

Real Estate Services  
TR-4609-P5

Case Number: 52062

**NOTICE OF NON-GAMING LAND ACQUISITION APPLICATION**

Pursuant to the Code of Federal Regulations, Title 25, INDIANS, 151.11 Off-Reservation, notice is given of the application filed by the SKOKOMISH INDIAN TRIBE to have real property accepted "in trust" for said applicant by the United States of America. The determination whether to acquire this property "in trust" will be made in the exercise of discretionary authority which is vested in the Secretary of the Interior, or his authorized representative, U.S. Department of the Interior. To assist us in the exercise of that discretion, we invite your comments on the proposed acquisition. In order for the Secretary to assess the impact of the removal of the subject property from the tax rolls, and if applicable to your organization, we also request that you provide the following information:

- (1) If known, the annual amount of property taxes currently levied on the subject property allocated to your organization;
- (2) Any special assessments, and amounts thereof, that are currently assessed against the property in support of your organization;
- (3) Any governmental services that are currently provided to the property by your organization; and
- (4) If subject to zoning, how the intended use is consistent, or inconsistent, with the zoning.

We provide the following information regarding this application:

**Applicant:**

SKOKOMISH INDIAN TRIBE

**Legal Land Description/Site Location:**

See "Exhibit A" for legal descriptions.

**Project Description/Proposed Land Use:**

THE LAND IS CURRENTLY UNDEVELOPED AND THERE WILL BE A CHANGE OF USE AS FOLLOWS: 10,000 SQUARE FOOT CONVENIENCE STORE, GAS STATION WITH 8 FUEL DISPENSERS, AND ASSOCIATED PAVED PARKING AND ACCESS.

NOLAQ01

**\*P ; P ; 10 ; 120 ; 4200401360 ; 52062 ; 120T000055\***  
Office Codes: P, P, 10, 120 AD Number: 4200401360 Case: 52062

As indicated above, the purpose for seeking your comments regarding the proposed trust land acquisition is to obtain sufficient data that would enable an analysis of the potential impact on local/state government, which may result from the removal of the subject property from the tax roll and local jurisdiction.

This notice does not constitute, or replace, a notice that might be issued for the purpose of compliance with the National Environmental Policy Act (NEPA) of 1969.

Your written comments should be addressed to the Bureau of Indian Affairs office listed at the top of this notice. Any comments received within thirty days of your receipt of this notice will be considered and made a part of our record. You may be granted one thirty day extension of time to furnish comments, provided you submit a written justification requesting such an extension within thirty days of receipt of this letter. Additionally, copies of all comments will be provided to the applicant for a response. You will be notified of the decision to approve or deny the application.

If any party receiving the enclosed notice is aware of additional governmental entities that may be affected by the subject acquisition, please forward a copy to said party.

A copy of the application, excluding any documentation exempted under the Freedom of Information Act (FOIA), is available for review at the above address. A request to make an appointment to review the application, or questions regarding the application, may be directed to the PUGET SOUND AGENCY Office attention: MONICA DEHRENS, REALTY SPECIALIST, (503) 231-6757.

Sincerely,



Digitally signed by KELLY  
MILLHOUSE  
Date: 2023.09.29 14:07:36 -07'00'

---

ACTING SUPERINTENDENT

Enclosure(s)

NOLA001

**\*P ; P ; 10 ; 120 ; 4200401360 ; 52062 ; 120T000055\***  
Office Codes: P1P1101120 AD Number: 4200401360 Case: 52062



CC:

BY CERTIFIED MAIL:

**STATE OF WASHINGTON GOVERNOR'S OFFICE OF INDIAN AFFAIRS**

1110 CAPITOL WAY SOUTH, SUITE 225

OLYMPIA, WA 98504-0909

Certified Mail ID: **7020 0640 0002 1120 6715**

**KITSAP COUNTY - BOARD OF COUNTY COMMISSIONERS**

615 DIVISION STREET MS- 4

PORT ORCHARD, WA 98366

Certified Mail ID: **7020 0640 0002 1120 6722**

**CITY OF BREMERTON**

345 6TH STREET SUITE 100

BREMERTON, WASHINGTON 98337

FEDEX TRACKING NO. **8166 2729 9531**

BY FIRST CLASS MAIL:

**Skokomish Legal Department**

Attn: Earle David Lees

N. 80 Tribal Center Road

Skokomish, Washington 98584

N0LAQ01

**\*P ; P ; 10 ; 120 ; 4200401360 ; 52062 ; 120T000055\***  
Office Codes: P, P, 10, 120 AD Number: 4200401360 Case: 52062

Exhibit 4

## BIA Cooperating Agency Request Letter



United States Department of the Interior  
BUREAU OF INDIAN AFFAIRS  
Northwest Regional Office  
911 NE 11<sup>th</sup> Avenue  
Portland, Oregon 97232-4169

12/26/2023

Via: Certified Mail Return Receipt #7015 1520 0002 6689 0008

Kitsap County Commissioners  
Attn: Charlotte Garrido, District 2 Commissioner  
614 Division St. MS - 4  
Port Orchard, WA 98366

Dear Commissioner Garrido,

The Bureau of Indian Affairs (BIA) is preparing an Environmental Assessment in accordance with the National Environmental Policy Act (NEPA) to analyze the potential environmental consequences of the Skokomish Indian Tribe's (Tribe's) application for a 43.5-acre fee-to-trust transfer and casino project in unincorporated Kitsap County, Washington adjacent to the City of Bremerton (see attached map). The proposal includes the development of an entertainment complex, including casino, bowling alley, movie theater and restaurant space, hotel, and associated parking and infrastructure.

The BIA, Northwest Region is serving as the Lead Agency for NEPA compliance. At this time, the BIA is extending an invitation to Kitsap County to participate in the NEPA process as a Cooperating Agency. Please inform this office of your willingness to accept this role at your earliest convenience.

If you have any questions or need additional information, please contact Tobiah Mogavero, Regional NEPA Coordinator, Bureau of Indian Affairs, Northwest Regional Office, 911 Northeast 11th Avenue, Portland, OR 97232-4169; telephone: (971-940-5875); e-mail: [Tobiah.mogavero@bia.gov](mailto:Tobiah.mogavero@bia.gov).

Sincerely,

Digitally signed by DALE  
SEBASTIAN  
Date: 2023.12.27 11:26:40 -08'00'

Dale L. Sebastian  
Acting Deputy Regional Director  
Trust Services

Enclosures: Skokomish Site Map

cc: Leslie MacMillan, Senior Paralegal/Land Manager, Skokomish Indian Tribe



Exhibit 5

Notice of Availability of Finding of No  
Significant Impact and Environmental  
Assessment for C-Store Project

# Kitsap Sun

PART OF THE USA TODAY NETWORK

PO Box 52173, Phoenix, AZ. 85072-2173

## **PROOF OF PUBLICATION**

Bibiana Sparks  
5170 Golden Foothill Parkway  
El Dorado Hills CA 95762

STATE OF WISCONSIN, COUNTY OF BROWN.

I, being first duly sworn on oath, deposes and says: That I am now, and at all times embraced in the publication herein mentioned was the principal clerk of the printers and publishers of KITSAP SUN; that said newspaper has been approved as a legal newspaper by the order of the Superior Court of the County of Kitsap, in which County it is published and is now and has been for more than 6 months prior to the date of the publication hereinafter referred to, published in the English language continually as a daily newspaper in Bremerton, Kitsap County, Washington, a weekly newspaper in Kitsap County, Washington and is now and during all of the said time, was printed in an office maintained in the aforesaid place of publication of said newspaper; that the following is a true text of an advertisement as it was published in regular issues (and not in supplement form) of said newspaper on the following date(s), to wit: And on

01/28/2024

such newspaper was regularly distributed to its subscribers during all of said period.

Subscribed and sworn to before on 01/28/2024

Legal Clerk

Notary, State of WI, County of Brown

My commission expires

Publication Cost: \$212.20

Order No: 9782326

# of Copies:

Customer No: 1344212

0

PO #: LBKS0055476

**THIS IS NOT AN INVOICE!**

*Please do not use this form for payment remittance.*

KATHLEEN ALLEN  
Notary Public  
State of Wisconsin

**Notice of Availability: Finding of No Significant Impact and Environmental Assessment for the proposed Convenience Store 3.26-Acre Duhlelap Property Fee-to-Trust Project, Skokomish Indian Tribe, Kitsap County, Washington**

**LEAD AGENCY:** Department of the Interior, Bureau of Indian Affairs

**SUMMARY:** This notice is to advise interested parties that the Bureau of Indian Affairs (BIA) as lead federal agency, with the Skokomish Indian Tribe has signed a notice of availability (NOA) and prepared a final Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) for the proposed action in Kitsap County, Washington. This notice also announces the NOA, EA and FONSI are now available at [www.skokomishea.com](http://www.skokomishea.com) and in hard copy at the address(s) below.

**ADDRESSES:** You may request a hard copy of the EA and FONSI by writing the BIA Northwest Region Office, Division of Environmental & Cultural Resource Management (DECRM), 911 NE 11th Avenue, Portland, Oregon 97232-4169 and/or BIA Puget Sound Agency, 2707 Colby Ave., Suite 1101, Everett, WA 98201-3528, and the Skokomish Indian Tribe, 80 North Tribal CTR Road, Shelton, WA 98584-9748

**FOR FURTHER INFORMATION CONTACT:** Tobiah Mogavero, BIA Regional NEPA Coordinator, at (971) 940-5875, or Janine Van Dusen, BIA Puget Sound Agency Superintendent, at (425) 622-9158.

**SUPPLEMENTAL INFORMATION:** Skokomish Indian Tribe has proposed an off-reservation Fee to Trust acquisition that will bring 3.26 acres into trust to build a 10,000 sq. ft. convenience store, a gas station with 8 fuel pumps, and paved access areas. The property is located within Township 23 North, Range 1 West, Section 15, Willamette Meridian, Kitsap County, Washington.

January 28 2024

LBKS0055476



## DEPARTMENT OF THE INTERIOR

### Bureau of Indian Affairs

#### **Final Environmental Assessment for the proposed Convenience Store 3.26-Acre Duhlelap Property Fee-to-Trust Project, Skokomish Indian Tribe, Kitsap County, Washington**

**AGENCY:** Bureau of Indian Affairs

**ACTION:** Notice of Availability

**SUMMARY:** This notice is to advise interested parties that the Bureau of Indian Affairs (BIA) as lead federal agency, with the Skokomish Indian Tribe has prepared a final Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) for the proposed action in Kitsap County, Washington. This notice also announces the EA and FONSI are now available in hard copy at the address(s) below.

**ADDRESSES:** You may request a hard copy of the EA and FONSI by writing the BIA Northwest Region Office, Division of Environmental & Cultural Resource Management (DECRM), 911 NE 11<sup>th</sup> Avenue, Portland, Oregon 97232-4169 and/or BIA Puget Sound Agency, 2707 Colby Ave., Suite 1101, Everett, WA 98201-3528, and the Skokomish Indian Tribe, 80 North Tribal CTR Road, Shelton, WA 98584-9748

**FOR FURTHER INFORMATION CONTACT:** Tobiah Mogavero, BIA Regional NEPA Coordinator, at (971) 940-5875, or Janine Van Dusen, BIA Puget Sound Agency Superintendent, at (425) 622-9158.

**SUPPLEMENTAL INFORMATION:** Skokomish Indian Tribe, through contractual obligations to the BIA, has proposed an off-reservation Fee to Trust acquisition that will bring 3.26 acres into trust to build a 10,000 sq. ft. convenience store, a gas station with 8 fuel pumps, and paved access areas. The property is located within Township 23 North, Range 1 West, Section 15, Willamette Meridian, Kitsap County, Washington.

**AUTHORITY:** This notice is published pursuant to 43 CFR 46.305 of the Department of Interior Regulations (43 CFR 46 et seq.), the procedural requirements of the National Environmental Policy Act of 1969, as amended (42 U.S.C. 4371 et seq.), and in accordance with the exercise of authority delegated to the Assistant Secretary – Indian Affairs by 209 DM 8.

---

Janine Van Dusen Superintendent  
Puget Sound Agency  
Bureau of Indian Affairs  
U.S. Department of the Interior

---

01/22/2024

Date

## **Finding of No Significant Impact (FONSI)**

### **Skokomish Indian Tribe, Convenience Store 3.26-Acre Duhlelap Property Fee-to-Trust Project Kitsap County, Washington**

Based on the attached Final Environmental Assessment's (EA) for the Proposed Action Alternative-Alternative A for the Skokomish Indian Tribe FTT application, an off-reservation conveyance that will bring 3.26 acres into trust to build a 10,000 sq. ft. convenience store, a gas station with 8 fuel pumps, and paved access areas. The property is within Kitsap County, Washington, located within Township 23 North, Range 1 West, Section 15, Willamette Meridian. The proposed FTT acquisition and development will not have a significant impact on the quality of the human environment. In accordance with Section 102 (2) (c) of the National Environmental Policy Act (NEPA), as amended, an Environmental Impact Statement will not be required.

This determination is supported by the following:

1. The Skokomish Indian Tribe Convenience Store 3.6-Acre Duhlelap Property Fee-to-Trust Project Environmental Assessment (EA) discloses the environmental consequences of Alternative B-the No Action Alternative, and Alternative A-the Proposed Action Alternative.
2. Protective measures will be levied to protect soil, air (Clean Air Act as amended 42 U.S.C. 7401 et seq.) and water quality (Clean Water Act of 1977, 33 U.S.C. 1251 et seq.). Development of the Proposed Action will comply with the requirements within the U.S. Environmental Protection Agency (USEPA) National Pollution Discharge Elimination System (NPDES) General Construction Permit, which includes adopting a Stormwater Pollution Prevention Plan (SWPPP) that would include soil erosion prevention BMPs. These measures will include appropriately placed silt fencing, straw wattles, rock check dams, and plastic covering of exposed slope cuts and soil stockpiles.

The following measures are recommended for the Proposed Alternative-Alternative A to prevent erosion and impacts to surface water quality:

- The outfall from the underground stormwater detention basin shall be armored or the stormwater otherwise dissipated to avoid erosion on or off the Project Site.
- The outfall from the underground stormwater detention basin shall be directed to a vegetated swale or diffused to sheet flow in a manner that ensures that erosion does not occur on or off of the Project Site and that stormwater from the Project Site is diffused and dissipated in a manner that does not adversely increase stormwater flows downstream.

The following measures are recommended for the Proposed Alternative-Alternative A to prevent impacts to the groundwater basin, the Union River, or nearby wells:

- If the Tribe chooses to develop a groundwater well on the Project Site to provide water to the proposed development, the Tribe shall first develop a test well to determine if a well can provide an adequate and sustainable yield without significant impacts to the Union River or existing legal groundwater wells used for public or private water supply. A hydrogeologic study shall be conducted to evaluate the hydraulic connectivity with the shallow aquifer to assess potential impairment to the Union River and determine mitigation needs.
  - If the hydrogeologic study determines that the streamflow of the Union River would be impaired or depleted by use of the Tribe's groundwater well on the Project Site, a mitigation program shall be drafted and adopted by the Tribe to offset any associated losses in the streamflow of the Union River. Options to offset the adverse effects of the Tribe's groundwater withdrawal include, but are not limited to percolation of reclaimed water, retiring an existing water right, or cessation of an existing use.
3. The proposed action was developed to result in a '**no-effect**' finding for threatened or endangered species (Threatened and Endangered Species Act of 1983, as amended, 16 U.S.C et seq.).

The following measures are recommended for the Proposed Alternative-Alternative A to avoid and/or reduce impacts to potentially nesting migratory birds and other birds of prey in accordance with the federal Migratory Bird Treaty Act:

- Tree clearing and removal of vegetation shall occur outside the bird nesting season (February 15 to September 15) to the extent feasible.
- If tree removal or trimming of vegetation and trees cannot avoid the bird nesting season, a qualified wildlife biologist shall conduct a pre-construction nesting survey within 7 days prior to the start of such activities or after any construction breaks of 14 days or more. Surveys shall be performed for the Project Site and suitable habitat within 250 feet of the Project Site in order to detect any active passerine (perching bird) nests and within 500 feet of the Project Site to identify any active raptor (bird of prey) nests.
- If active nests are identified during the pre-construction bird nesting surveys, the wildlife biologist shall place species, and site-specific no-disturbance buffers around each nest. Buffer size would typically be between 50 and 250 feet for passerines and between 300 and 500 feet for raptors (birds of prey). These distances may be adjusted depending on the level of surrounding ambient activity (i.e., if the Project Site is adjacent to a road or community development) and if an obstruction, such as a building structure, is within line-of-sight between the nest and construction.

For bird species that are federally- and/or State-listed sensitive species (i.e., fully protected, endangered, threatened, species of special concern), a Project representative, supported by the wildlife biologist, shall consult with the USFWS and/or WDFW regarding modifying nest buffers. The following measures shall be implemented based on their determination:



- If construction would occur outside of the no-disturbance buffer and is not likely to affect the active nest, then construction may proceed. However, the biologist should be consulted to determine if changes in the location or magnitude of construction activities could affect the nest.
  - If construction may affect the active nest, the biologist and a Project representative shall consult with the USFWS and/or WDFW, dependent on regulatory status, to develop alternative actions such as modifying construction, monitoring of the nest during construction, or removing or relocating active nests.
  - Any birds that begin nesting within the Project Site and survey buffers amid construction activities shall be assumed to be habituated to construction related or similar noise and disturbance levels and minimum work exclusion zones of 25 feet shall be established around active nests in these cases.
4. Per §36 CFR 800.5(b), the BIA has determined that the implementation of the proposed undertaking will result in a **‘No Adverse Effect’** to historic properties by implementing the Proposed Alternative-Alternative A. For the purpose of 36 CFR 800.9 (b). The following mitigation measures shall be implemented in accordance with federal regulatory requirements:
- In the event of any inadvertent discovery of prehistoric or historic archaeological resources during construction-related earth-moving activities, all such finds shall be subject to Section 106 of the NHPA as amended (36 CFR 800). Specifically, procedures for post-review discoveries without prior planning pursuant to 36 CFR 800.13 shall be followed. All work within 50 ft of the find shall be halted until a professional archaeologist meeting the Secretary of the Interior’s qualifications (36 CFR § 61), or paleontologist if the find is of a paleontological nature, can assess the significance of the find in consultation with the Tribal Historic Preservation Office (THPO), BIA, other appropriate agencies. If any find is determined to be significant by the archaeologist or paleontologist, a THPO representative shall meet with the archaeologist or paleontologist to determine the appropriate course of action, including the development of a Treatment Plan and implementation of appropriate provisions, if necessary. All significant cultural or paleontological materials recovered shall be subject to scientific analysis, professional curation, and a report prepared by the professional archaeologist or paleontologist, according to current professional standards.
  - If human remains are discovered during ground-disturbing activities on Tribal lands, the THPO and BIA representative shall be contacted immediately. No further disturbance shall occur until the THPO and BIA representative have made the necessary findings as to the origin and disposition. If the remains are determined to be of Native American origin, the BIA representative shall notify a Most Likely Descendant. The Most Likely Descendant is responsible for recommending the appropriate disposition of the remains and any grave goods.
5. The proposed action will not cause a significant effect to energy resources (Energy Policy Act of 2005), water resources, wetlands (E.O. 11990), or flood plains (E.O. 11988). There

are no wetlands within the Project Site. However, there are delineated wetlands to the northwest near Lider Lake. The wetlands are over 750 feet from the northwesterly property line of the Project Site.

6. The proposed action will not affect unique characteristics of the geographic area such as prime farmlands. The site was assessed by the Bureau of Indian Affairs (BIA) and the National Resource Conservation Service (NRCS) using the NRCS Farmland Conversion Impact Form. The site was evaluated for its characteristics and rated at a score of 95. Since the rating is less than 160, the proposed action will result in a **‘No Adverse Effect’** prime farmlands (EA, Appendix L).
7. The proposed action is not highly controversial, does not present uncertain effects on the human environment, or involve unknown risks.
8. The proposed action will not establish a precedent for future actions with significant effects or represent a decision in principle about a consideration.
9. There proposed action would improve the economic and social conditions of the affected Tribal community and promote Tribal self-sufficiency. Construction and operation of the project alternatives will result in economic outputs that has the potential to induce economic growth within the surrounding communities.
10. The proposed action conforms to Federal, State or local law or requirements imposed for the protection of the environment. Prior to the commencement of ground disturbing construction activities, the Tribe would apply for coverage under the EPA's Construction General Permit through submittal of a Notice of Intent and preparation of a Construction Stormwater Pollution Prevention Plan (CSWPPP) that would be stored on site in accordance with the requirements of the National Pollutant Discharge Elimination System permitting process under the Clean Water Act.

Furthermore, the source-control BMPs listed below give a broad overview of measures that will be taken to prevent stormwater from coming into contact with pollutants on-site, both during and after construction activities:

- To minimize dust generation during construction, soil will be wetted down with water prior to ground disturbance. All generated waste must be properly disposed of.
- Perimeter erosion control measures will be installed to retain sediment and other pollutants within the site limits. Existing catch basins with the project vicinity will have inlet protection measures installed to provide secondary protection from polluted stormwater entering the City's storm main system.
- Loose aggregate chunks and dust will be swept or shoveled and collected (not hosed down a storm drain) for recycling or proper disposal.
- A Spill Prevention Countermeasures and Control Plan (SPCC) Plan may be prepared from the contractor to mitigate any potential spills or leaks from construction materials, machinery, and equipment during construction.

- The gas station will be covered and have internal drains (i.e., trench drains) to collect any spills or minor amounts of precipitation. The liquids collected by the internal drain system will be conveyed to an oil/water separator and then outfall to the sewer system.
- Solid waste storage containers will be stored in a roofed enclosure so that runoff cannot come into contact with the waste storage containers. The storage area will be paved with the area's grading to prevent uncontaminated stormwater from flowing into the waste storage area.

---

Janine Van Dusen, Superintendent  
Puget Sound Agency  
Bureau of Indian Affairs  
U.S. Department of the Interior

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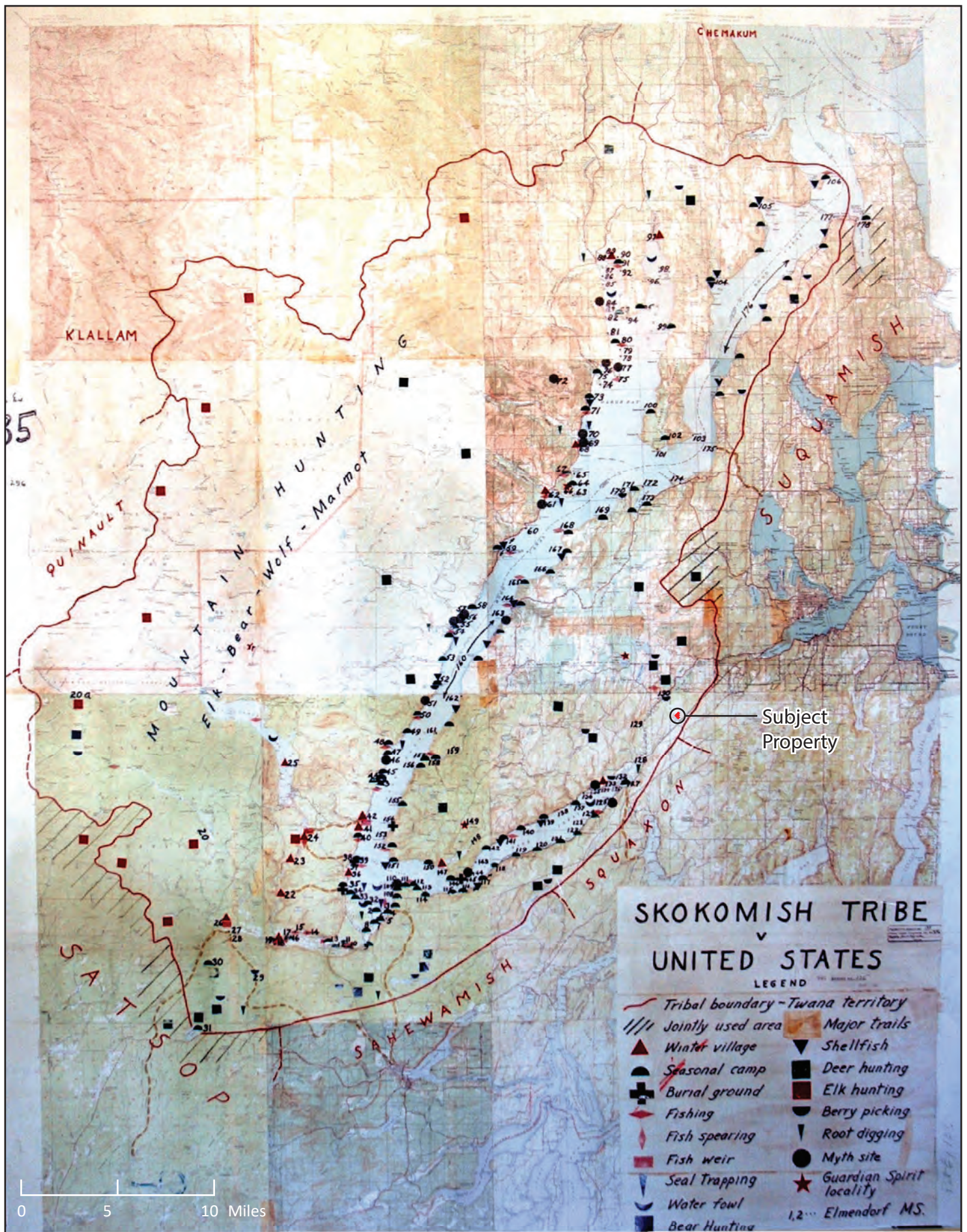
01/22/2024

Date



Exhibit 7

## Skokomish Territory Documentation



Source: Skokomish, ICC Dkt. No. 296 - Map Ex. 135 - Twana Map (1956)

INDIAN CLAIMS COMMISSION - MAP OF TWANA TERRITORY SHOWING SUBJECT PROPERTY



Special Master  
Robert Cooper

FILED  
NOTED  
RECEIVED

NOV 3 1992

CLERK U.S. DISTRICT COURT  
UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,  
et al.,

Plaintiffs,

v.

STATE OF WASHINGTON, et al.,

Defendants.

CIVIL NO. 9213 - Phase I

HOOD CANAL AGREEMENT  
BETWEEN SKOKOMISH INDIAN  
TRIBE, PORT GAMBLE BAND  
OF KLALLAM INDIANS, LOWER  
ELWHA BAND OF KLALLAM  
INDIANS AND JAMESTOWN  
BAND OF KLALLAM INDIANS

The Skokomish Indian Tribe, Port Gamble Band of Klallam Indians, Lower Elwha Band of Klallam Indians and Jamestown Band of Klallam Indians [hereinafter referred to as "the Stipulating Parties"] agree as follows:

I.

PURPOSE OF SETTLEMENT

1. The purpose of this Hood Canal Agreement is to achieve a mutually acceptable settlement among the Stipulating Parties of the following litigation:

A. Request for Determination Re: Primary Right of Skokomish Indian Tribe in Hood Canal Fishery, filed June 17, 1981 (hereinafter "Skokomish Primary Right case").

Hood Canal Agreement - 1.

LAW OFFICES OF  
WICKWIRE, LEWIS, GOLDMARK  
& SCHORR  
800 MAYNARD BUILDING  
SEATTLE, WASHINGTON 98104  
(206) 622-0603



1 B. Request for Determination: Port Gamble Klallam  
2 Usual and Accustomed Fishing Areas, filed August 11, 1978  
3 (hereinafter "Port Gamble Klallam U and A case").

4 C. Request for Determination: Lower Elwha Klallam  
5 Usual and Accustomed Fishing Areas, filed August 11, 1978  
6 (hereinafter "Lower Elwha Klallam U and A case").

7 2. It is the intent of the Stipulating Parties to confirm  
8 and preserve the pre-treaty historical relationship between the  
9 Clallam and Skokomish (or Twana) peoples concerning fishing  
10 rights in the Hood Canal fishery. Because of their close inter-  
11 tribal relationship and the fact that historically the Skokomish  
12 Tribe and the Klallam Bands have been able to share the Hood  
13 Canal fishery resources on a mutually acceptable basis, the  
14 Skokomish Tribe and the Klallam Bands have determined that the  
15 best course for them is to settle any differences between them  
16 regarding fishing in Hood Canal by this Agreement rather than by  
17 further litigation.

18 II.

19 BASIS FOR SETTLEMENT

20 3. The Skokomish Indian Tribe filed its request for deter-  
21 mination of its primary right in the Hood Canal fishery on  
22 June 17, 1981. In that proceeding the Skokomish Tribe seeks a  
23 determination that its "treaty fishing rights in Hood Canal and  
24 all the rivers and streams draining into the Canal are primary to  
25  
26

1 the rights of any other tribe which has or claims to have usual  
2 and accustomed fishing places there." Skokomish Tribe's Request  
3 for Determination Re: Primary Right of Skokomish Indian Tribe in  
4 Hood Canal Fishery. The Skokomish Tribe also asserts in this  
5 proceeding that its primary right "includes the right to regulate  
6 or prohibit fishing by other tribes in Hood Canal and all rivers  
7 and streams draining into it." Id. The Port Gamble Klallam  
8 Band, the Makah Tribe, the Tulalip Tribes of Washington, and the  
9 Suquamish Tribe objected to the Skokomish Tribe's primary right  
10 request.

11 4. The Skokomish Tribe's primary right request was ini-  
12 tiated to protect the Tribe's vital interests in the Hood Canal  
13 fishery. Since time immemorial, members of the Skokomish Tribe  
14 and its aboriginal predecessors have relied for their livelihood  
15 on the Hood Canal fishery. Today the Skokomish Tribe continues  
16 to be entirely dependent on the Hood Canal fishery for its catch  
17 because it has no established usual and accustomed fishing places  
18 outside Hood Canal and the rivers and streams draining into it.  
19 Historically, substantial numbers of Clallam Indians have also  
20 fished in Hood Canal and in rivers and streams draining into it.  
21 Today the Klallam Bands, and particularly the Port Gamble Band of  
22 Klallam Indians, continue to have a strong interest in access to  
23 and protection of the Hood Canal fishery.

24 5. The Stipulating Parties agree to the entry of the  
25 following findings of fact to support this agreement:  
26

1           A.   On and before January 6, 1855, the date the Treaty  
2 of Point-No-Point was executed by its signatories, the  
3 Skokomish Tribe, through its aboriginal predecessors the  
4 Twana Indians, exercised legitimate territorial control over  
5 the Hood Canal fishery, including Hood Canal and all rivers  
6 and streams draining into it. This territorial control was  
7 the product of: (1) the proximity of Hood Canal and its  
8 drainage basin to the winter villages and summer camping and  
9 fishing grounds of the Twana people; (2) the high frequency  
10 of use of the Hood Canal and the rivers and streams draining  
11 into it by the Twana Indians; (3) a contemporary conception  
12 among the Coast Salish Indians (of whom the Stipulating  
13 Parties are constituent groups) that Hood Canal and the  
14 rivers and streams draining into it were legitimately in the  
15 possession of the Twana people and subject to use by others  
16 only upon invitation and permission given by the Twana; (4)  
17 behavior of the Stipulating Parties consistent with a mutual  
18 recognition that the Twanas controlled the Hood Canal  
19 fishery, including Hood Canal and all rivers and streams  
20 draining into it.

21           B.   The Clallam Indians, the aboriginal predecessors of  
22 the Stipulating Klallam Bands, and the Twana Indians enjoyed  
23 a strong and cordial relationship at and before treaty time.  
24 This relationship was unique in degree to the two peoples and  
25  
26



1 was founded in a common culture, mutual respect and admira-  
2 tion, and resulting marriage and ritual ties. The Clallam  
3 villages were situated at the mouths of rivers draining into  
4 the Strait of Juan de Fuca. Each year significant numbers of  
5 Clallam Indians would travel from their villages to sites on  
6 Hood Canal to fish with the Twana. Most, if not all, of  
7 these Clallam visitors were marriage relatives of Twana  
8 Indians. The Clallam who fished on Hood Canal did so with  
9 the understanding that the Hood Canal fishery was Twana  
10 territory. There is no evidence that the Twana people ever  
11 attempted to, or did, exclude Clallam fishermen from the Hood  
12 Canal fishery, or that any need to do so ever arose. Because  
13 of their shared culture and the perceived importance of  
14 favorable relations between the Clallam and Twana peoples, it  
15 is likely that the Twana people welcomed and affirmatively  
16 encouraged Clallam friends and marriage relatives to come to  
17 the Hood Canal area for fishing, as well as for socializing  
18 and ritual activities. The Clallam reciprocated by inviting  
19 Twana people to their villages as guests and relatives.

20 6. The Stipulating Parties hereby agree to the introduction  
21 and consideration by the Court of the following evidence in sup-  
22 port of the above-stated findings:

23 A. Dr. Barbara Lane, "Anthropological Report on the  
24 Identity, Treaty Status and Fisheries of the Skokomish Tribe  
25 of Indians," Exhibit USA 23;

1 B. Dr. Barbara Lane, "Skokomish Usual and Accustomed  
2 Fishing Places in Hood Canal: A Supplemental Report"  
3 (February, 1981), filed on June 17, 1981, as Exhibit A to  
4 Skokomish Tribe's Request for Determination herein;

5 C. Deposition of Dr. William W. Elmendorf  
6 (February 25-26, 1982), taken and lodged herein;

7 D. Dr. William W. Elmendorf, The Structure of Twana  
8 Culture, Monographic Supplement No. 2; Research Studies,  
9 Volume 28, No. 3 (September 1960) (with comparative notes on  
10 the structure of Yurok culture), attached to the deposition  
11 of Dr. Elmendorf as Exhibit 2;

12 E. All primary and secondary sources to the extent  
13 referred to in the foregoing documents.

14 III.

15 TERMS OF THE AGREEMENT

16 In consideration of the mutual promises contained in this  
17 Agreement, the Stipulating Parties hereby agree as follows:

18 7. A. The Skokomish Tribe has the primary right to fish  
19 in the Hood Canal fishery. As used in this Agreement, the term  
20 "Hood Canal fishery" includes all waters of the Hood Canal south  
21 of a line drawn between Foulweather Bluff and Olele Point, and  
22 all rivers and streams draining into Hood Canal. The primary  
23 right of the Skokomish Tribe is an aboriginal right of that tribe  
24 confirmed and preserved by the Treaty of Point-No-Point (12 Stat.

1 933). (See United States v. Lower Elwha Tribe, 642 F.2d 1141  
2 (9th Cir.), cert. denied, \_\_\_\_ U.S. \_\_\_\_, 102 S. Ct. 320 (1981).)

3 B. Because of the close relationship that exists and  
4 has existed between the Skokomish Tribe and the Klallam Bands and  
5 because they have traditionally fished together in Hood Canal  
6 sharing the fishery resources in a mutually acceptable manner,  
7 the Stipulating Parties further agree that north of Ayock Point  
8 on Hood Canal the Skokomish Tribe and the Klallam Bands may exer-  
9 cise their respective treaty fishing rights without any limita-  
10 tion or control whatsoever by any of the Stipulating Parties,  
11 except as the Stipulating Parties may mutually agree by compact  
12 or otherwise. The Skokomish Tribe specifically agrees that it  
13 will not, under any condition or for any reason whatsoever, exer-  
14 cise or seek to exercise its primary right on Hood Canal north of  
15 Ayock Point, or on the streams and rivers draining into Hood  
16 Canal north of Ayock Point, against any of the other Stipulating  
17 Parties without its or their express consent.

18 8. The parties agree that the usual and accustomed fishing  
19 grounds of the Port Gamble Band and Lower Elwha Band as set forth  
20 in the "Corrected Order Re: Request for Determination of Port  
21 Gamble and Lower Elwha Usual and Accustomed Fishing Places" filed  
22 October 28, 1981, be revised to exclude the Skokomish River and  
23 all of its tributaries from Klallam usual and accustomed fishing  
24 areas. The intent of the parties is that the Klallam usual and  
25  
26



1 accustomed fishing areas shall include all of Hood Canal and the  
2 streams draining into Hood Canal except the Skokomish River and  
3 all of its tributaries, but that fishing in Hood Canal and the  
4 streams draining into Hood Canal shall be subject to the primary  
5 right of the Skokomish Tribe as set forth in paragraph 7 of this  
6 Agreement. To that end, the parties agree that findings of fact  
7 341 and 342 of the Court's October 28, 1981, order be revised to  
8 read as follows:

9 341. The usual and accustomed fishing  
10 grounds of the Port Gamble Band of Klallam  
11 Indians include the waters of the Strait of  
12 Juan de Fuca, and all the streams draining  
13 into the Strait from the Hoko River east to  
14 the mouth of Hood Canal. In addition, the  
15 Port Gamble Klallam Band has usual and  
16 accustomed fishing rights to the Sekiu River,  
17 but the fishing on this river shall be subject  
18 to the control and regulation of the Makah  
Indian Tribe. Furthermore, the usual and  
accustomed fishing grounds of the Port Gamble  
Klallam Band include the waters of the San  
Juan Island archipelago and the waters off the  
west coast of Whidbey Island. The usual and  
accustomed fishing grounds of the Port Gamble  
Klallam Band also include Hood Canal and all  
streams draining into Hood Canal except the  
Skokomish River and all of its tributaries.

19 342. The usual and accustomed fishing  
20 grounds of the Lower Elwha Band of Klallam  
21 Indians include, in addition to those deter-  
22 mined in the Order of April 18, 1975, 459  
23 F. Supp. at 1049, and the Order of March 10,  
24 1976, 459 F. Supp. at 1066, the waters of the  
25 San Juan Island archipelago and the waters off  
26 the west coast of Whidbey Island and Hood  
Canal and all streams draining into Hood Canal  
except the Skokomish River and all of its  
tributaries.

1           9.    The parties recognize that the Jamestown Band does not  
2 yet have adjudicated usual and accustomed fishing areas and are  
3 currently fishing pursuant to an interim order. The parties  
4 agree that while fishing pursuant to any interim orders, the  
5 Jamestown Band's treaty fishing rights in Hood Canal and the  
6 streams draining into Hood Canal shall be as follows:

7           The usual and accustomed fishing grounds of  
8 the Jamestown Band of Klallam Indians include  
9 Hood Canal and all streams draining into Hood  
Canal except the Skokomish River and all of  
its tributaries.

10          Nothing in this paragraph shall have the effect of waiving or  
11 qualifying any objection to the final determination of usual and  
12 accustomed fishing areas of the Jamestown Band by any of the  
13 other Stipulating Parties.

14          10.   Resolutions of the governing bodies of the Stipulating  
15 Parties are attached hereto in support of this Agreement.

16  
17 Dated:

10-15-82

Lucy A. Schayler  
Chairperson, Skokomish Tribal  
Council

18  
19 Dated:

10-06-82

Ronald J. Usher  
Chairman, Port Gamble  
Klallam Band

20  
21 Dated:

10-1-82

Gerald Charles A.  
Chairman, Lower Elwha  
Klallam Band

1  
2 Dated:

10-2-82

Wm. Ben Allen  
Chairman, Jamestown  
Klallam Band

Presented by:

EISENHOWER, CARLSON, NEWLANDS,  
REHA, HENRIOT & QUINN

8 Dated:

October 21, 1982

By

Michael R. Thorp  
Michael R. Thorp  
Attorneys for Port Gamble  
Klallam Tribe

WICKWIRE, LEWIS, GOLDMARK  
& SCHORR

13 Dated:

November 1, 1982

By

Gregory M. O'Leary  
Gregory M. O'Leary  
Attorneys for Skokomish  
Tribe [on Skokomish Tribe's  
Primary Right Request]

16 Dated:

October 27, 1982

By

Stephen V. Quesenberry  
Stephen V. Quesenberry  
Attorney for Skokomish  
Tribe [on Port Gamble U&A  
Request]

[The United States will file a separate statement on the  
foregoing Agreement.]

22 Dated:

November 2, 1982

By

Stephen K. Strong  
Stephen K. Strong  
Attorney for Jamestown  
Klallam Band



FILED  
MAR 12 1983

U.S. DISTRICT  
COURT DISTRICT OF WASH.

RECOMMENDATION OF SPECIAL MASTER

Pursuant to the authority conferred upon me by the Amended Order of Reference to Special Master (Primary Right of Skokomish Indian Tribe in Hood Canal), entered herein on June 13, 1982, I have reviewed and hereby recommend that the Court approve the foregoing Hood Canal Agreement to the extent it concerns the primary right of the Skokomish Tribe in the Hood Canal fishery in relation to the Klallam Bands named in the agreement.

The matter referred to in paragraph 8 of the Hood Canal Agreement (dispute concerning location of Klallam usual and accustomed fishing places in the Hood Canal fishery) has not been referred to me and is presently pending before the Court. Accordingly, I make no recommendation concerning the contents of that paragraph.

Dated February 22, 1983

Robert E. Cooper

Robert E. Cooper  
Special Master

ORDER

Upon review of the foregoing Hood Canal Agreement and consideration of the recommendation of Special Master Robert E. Cooper concerning that agreement, the Court finds that the agreement represents a fair and equitable resolution between the

Hood Canal Agreement - 11

Law Offices of  
WICKWIRE, LEWIS, GOLDMANN  
& SCHORR  
800 MAYNARD BUILDING  
SEATTLE, WASHINGTON 98104  
(206) 442-1503

8240

3-17-83 copy to parties - dls

1 Skokomish Tribe and the named Klallam Bands of the matters iden-  
2 tified therein, and it is therefore

3 ORDERED that the foregoing Hood Canal Agreement is approved  
4 and the terms thereof are binding upon the parties to the  
5 agreement; and it is

6 FURTHER ORDERED that the United States submit an appropriate  
7 form of order to effect the revision of findings of fact 341 and  
8 342 of the Court's October 28, 1981 Order, as provided by  
9 paragraph 8 of the foregoing Hood Canal Agreement.

10  
11 Dated March 8, 1983

12  
13   
14 Walter E. Craig  
15 United States District Judge  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

# Skokomish Indian Tribe

Fisheries Bldg. (206) 877-5213 — Fire Hall (206) 877-5118

Rt. 5, Box 432

Shelton, WA 98584

## SKOKOMISH TRIBAL COUNCIL

### RESOLUTION #82- 47

WHEREAS, the Skokomish Tribal Council is the governing body of the Skokomish Tribe pursuant to the Constitution and By-Laws of the Skokomish Tribe approved by the Secretary of the Interior on March 17, 1980; and

WHEREAS, at the direction of the Skokomish Tribal Council, the Skokomish Tribe's attorney initiated in the United States District Court a request for determination of the Skokomish Tribe's primary treaty right to fish in Hood Canal and all rivers and streams draining into Hood Canal; and

WHEREAS, the Port Gamble band of Klallam Indians, the Makah Indian Tribe, the Tulalip Tribes of Washington, and the Suquamish Indian Tribe have all appeared in court and opposed the Skokomish primary right request (and the Makah Tribe has subsequently withdrawn its opposition); and

WHEREAS, the Skokomish Tribe has opposed a portion of an order of the court establishing the Port Gamble and Lower Elwha Klallam usual and accustomed fishing places in Hood Canal and on rivers and streams draining into Hood Canal, and has asked the court to modify its order to exclude from those places the Skokomish River system and certain other areas; and

WHEREAS, representatives of the Skokomish Tribe and the Port Gamble Band have engaged in negotiations to settle the disputes concerning the Skokomish primary right and the Port Gamble and Lower Elwha usual and accustomed fishing places, and have proposed adoption of the "Hood Canal Agreement Between Skokomish Indian Tribe, Port Gamble Band of Klallam Indians, Lower Elwha Band of Klallam Indians, and Jamestown Band of Klallam Indians" (attached to this resolution); and

WHEREAS, the Hood Canal Agreement provides that, between the Skokomish Tribe and the Klallam bands, the primary fishing right of the Skokomish Indian Tribe shall extend throughout the Hood Canal fishery, but that the Skokomish Tribe shall not enforce the primary right against the Klallam bands north of Ayock Point; and the Hood Canal Agreement also settles the dispute concerning the location of the Port Gamble and Lower Elwha usual and accustomed fishing places by providing that the order establishing those places should be modified to exclude the Skokomish River and all of its tributaries from the Klallam usual and accustomed fishing places; and



WHEREAS, the Hood Canal Agreement does not prevent the Skokomish Tribe from continuing its primary right case against the Tribe's other than the Klallam bands which have objected, and the Hood Canal Agreement is not binding on the Skokomish Tribe unless it is also approved by the Klallam bands; and

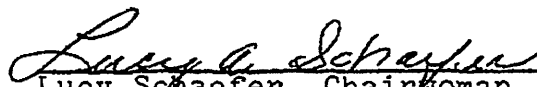
WHEREAS, the Skokomish Tribal Council finds that the Hood Canal Agreement is fair and just and in the best interests of the Skokomish Indian Tribe;


NOW THEREFORE BE IT RESOLVED, that the Skokomish Tribal Council hereby approves the attached Hood Canal Agreement Between Skokomish Indian Tribe, Port Gamble Band of Klallam Indians, Lower Elwha Band of Klallam Indians and Jamestown Band of Klallam Indians; and

BE IT FURTHER RESOLVED, that the Skokomish Tribal Council hereby directs its Chairperson to execute the Hood Canal Agreement on behalf of the Tribe; and further directs its attorneys to execute the agreement and to present it to the court for approval after all Klallam bands have approved the agreement.

### C E R T I F I C A T I O N

I, Lucy Schaefer, Chairwoman of the Skokomish Tribal Council, certify that the above resolution was adopted at a regular meeting of the Skokomish Tribal Council on 10-1-82, 1982, at which a quorum was present by a vote of 6 for and 0 against.

  
Lucy Schaefer, Chairwoman  
Skokomish Tribal Council

Attest:   
Diane Gouley, Secretary  
Skokomish Tribal Council

GERALD CHARLES, SR.  
Chairman

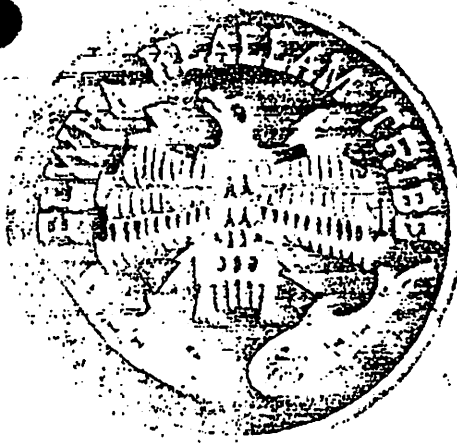
P.O. BOX 1370  
PORT ANGELES, WA 98362  
(206) 452-8471

Ed Sampson, Jr.  
Vice-Chairman

FLOYD COOKE  
Secretary-Treasurer

Alan Charles  
Councilman

OLIVER CHARLES, SR.  
Councilman



RESOLUTION NUMBER 82-133

WHEREAS, the Lower Elwha Tribal Community Council is the governing body of the Lower Elwha Band of the Klallam Tribe in accordance with its constitution and bylaws, approved by the Secretary of the Interior on April 28, 1968 and in accordance with the Indian Reorganization Act of June 18, 1934; and

WHEREAS, the Lower Elwha Klallam Tribe is currently involved in the following litigation:

1. Request for Determination Re: Primary Right of Skokomish Indian Tribe in Hood Canal Fishery, filed June 17, 1981.
2. Request for Determination: Lower Elwha Klallam Usual and Accustomed Fishing Areas, filed August 11, 1978; and


WHEREAS, the Lower Elwha Klallam Community Council believes it to be in the best interest of the Lower Elwha Klallam Tribe to settle these matters by agreement rather than by litigation.


NOW, THEREFORE BE IT RESOLVED, that the Lower Elwha Klallam Community Council hereby approves the Hood Canal Agreement between Skokomish Indian Tribe, Port Gamble Band of Klallam Indians, Lower Elwha Band of Klallam Indians and Jamestown Band of Klallam Indians, a copy of which is attached hereto and hereby incorporated by reference.

IT IS HEREBY FURTHER RESOLVED, that the Tribal Chairman or Vice Chairman is hereby authorized and directed to execute the attached Hood Canal Agreement on behalf of the Lower Elwha Klallam Community Council.

CERTIFICATION

The before mentioned resolution was adopted at a regular meeting of the Lower Elwha Business Committee at which time a quorum was present with a vote of 6 for and 1 against dated this day of September 15, 1982.

  
Gerald Charles, Sr.  
Chairman

  
Floyd Cooke  
Secretary-Treasurer

LOWER ELWHA TRIBAL COUNCIL

PORT GAMBLE KLALLAM

BUSINESS COMMITTEE

OF THE

BE IT KNOWN TO ALL

PORT GAMBLE KLALLAM

COMMUNITY COUNCIL

## I.

WHEREAS, the Port Gamble Klallam Indian Community is organized under the Indian Reorganization Act of June 18, 1934; and

## II.

WHEREAS, under its Constitution and Bylaws adopted August 5, 1939 the Community Council was designated as the governing body of the Port Gamble Klallam Indian Community; and

## III.

WHEREAS, by resolution dated April 22, 1956 the Port Gamble Klallam Community Council delegated the authority to conduct the business of the Port Gamble Klallam Indian Community to the Port Gamble Klallam Business Committee; and

## IV.

WHEREAS, the Port Gamble Klallam Tribe is currently involved in the following litigation:

1. Request for Determination RE: Primary Right of Skokomish Indian Tribe in Hood Canal Fishery, filed June 17, 1981.
2. Request for Determination: Port Gamble Klallam Usual and Accustomed Fishing Areas, filed August 11, 1978; and,

## V.

WHEREAS, the Port Gamble Klallam Business Committee believes it to be in the best interest of the Port Gamble Klallam Tribe to settle these matters by agreement rather than by litigation.

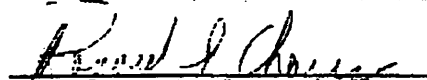
NOW, THEREFORE, BE IT RESOLVED, that the Port Gamble Klallam Business Committee hereby approves the Hood Canal Agreement between Skokomish Indian Tribe, Port Gamble Band of Klallam Indians, Lower Elwha Band of Klallam Indians and Jamestown Band of Klallam Indians, a copy of which is attached hereto and hereby incorporated by reference.

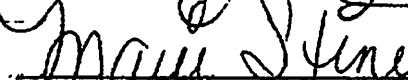
IT IS HEREBY FURTHER RESOLVED, that the Tribal Chairman or Vice Chairman is hereby authorized and directed to execute the attached Hood Canal Agreement on behalf of the Port Gamble Klallam Business Committee.

## C E R T I F I C A T I O N

WE HEREBY CERTIFY that on this date there was a meeting held of the Port Gamble Klallam Business Committee on the Port Gamble Indian Reservation, at which time a quorum was present;

WE FURTHER CERTIFY that the above numbered resolution, was at said meeting, introduced, evaluated, and was passed by a vote of 4 FOR, and 0 AGAINST, Dated this 4 day of October, 1982.

  
 Ronald G. Charles, Chairman  
 TRIBAL BUSINESS COMMITTEE

  
 Marie Stiner, Secretary  
 TRIBAL BUSINESS COMMITTEE





# JAMESTOWN KLALLAM TRIBE

150 South 5th - Suite 2 • Sequim, WA 98382  
Phone: (206) 683-1109 - (Fisheries) (206) 683-1001

## Resolution #62-82

WHEREAS, THE Jamestown Klallam Tribal Council is the governing body of the Jamestown Klallam Tribe in accordance with its constitution and by-laws adopted November 14, 1975; and

WHEREAS, THE Jamestown Klallam Indian Tribe has been Federally acknowledged by the Secretary of the Interior on February 10, 1981; and

WHEREAS, THE Jamestown Klallam Tribal Council is responsible for health, safety, and welfare of the Jamestown Klallam Indian Tribe; and

WHEREAS, THE Jamestown Klallam Tribe is currently involved in the following litigation:

1. Request for Determination Re: Primary Right of Skokomish Indian in Hood Canal Fishery, filed June 17, 1981.

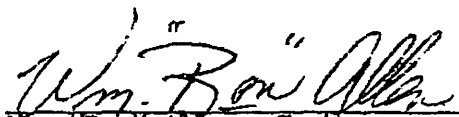
WHEREAS, THE Jamestown Klallam Tribal Council believes it to be in the best interest of the Jamestown Klallam Tribe to settle these matters by agreement rather than by litigation.

THEREFORE, BE IT RESOLVED, that the Jamestown Klallam Tribal Council hereby approves the Hood Canal Agreement between Skokomish Indian Tribe, Port Gamble Band of Klallam Indians, Lower Elwha Band of Klallam Indians and Jamestown Band of Klallam Indians, a copy of which is attached hereto and hereby incorporated by reference.

BE IT FURTHER RESOLVED, that the Tribal Chairman or Vice-Chairman is hereby authorized and directed to execute the attached Hood Canal Agreement on behalf of the Jamestown Klallam Tribal Council.

### CERTIFICATION

The foregoing resolution was adopted at a meeting of the Jamestown Klallam Tribal Council, held September 20, 1982, at the Jamestown Klallam Tribal Office in Sequim, Washington, at which time a quorum was present and approved by a vote of 3 FOR and 0 AGAINST.

  
Wm. "Ron" Allen, Chairman

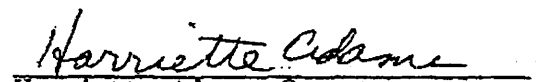
  
Harriette Adams, Secretary

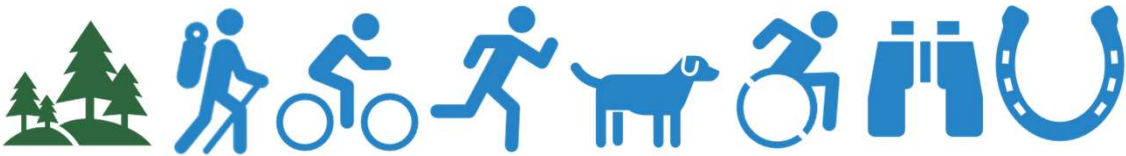
Exhibit 8

## WSDOT Roundabout

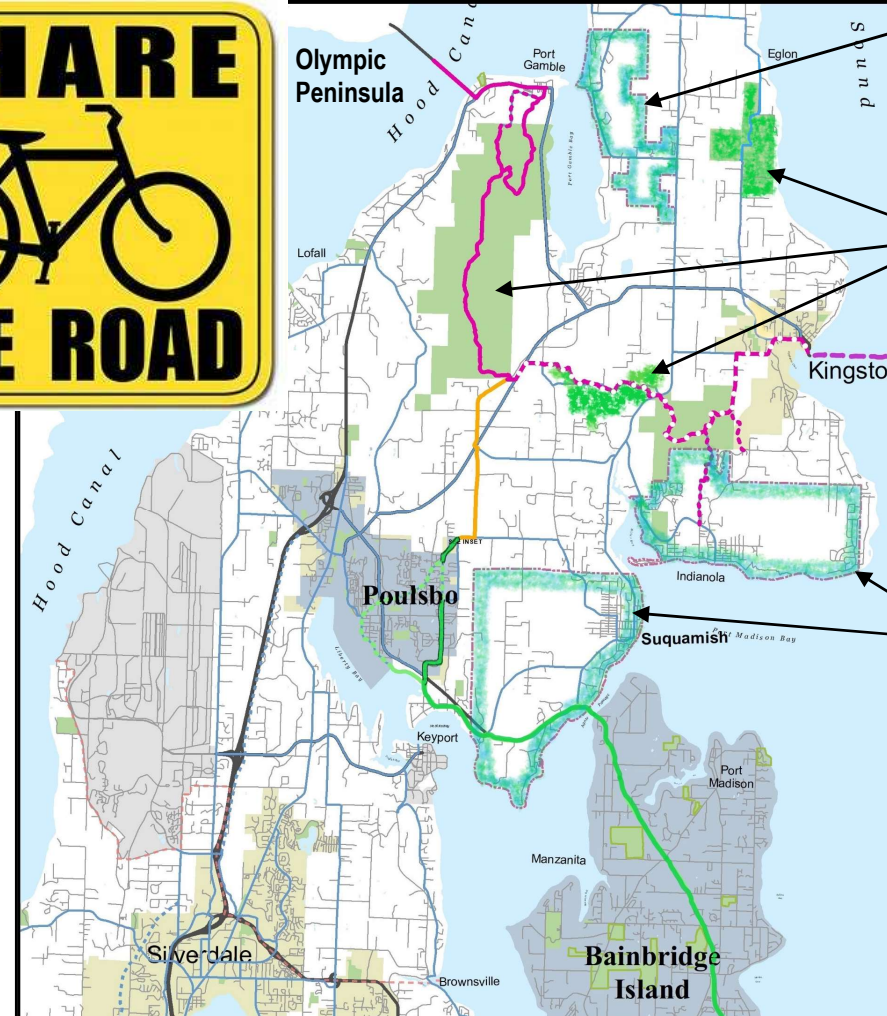
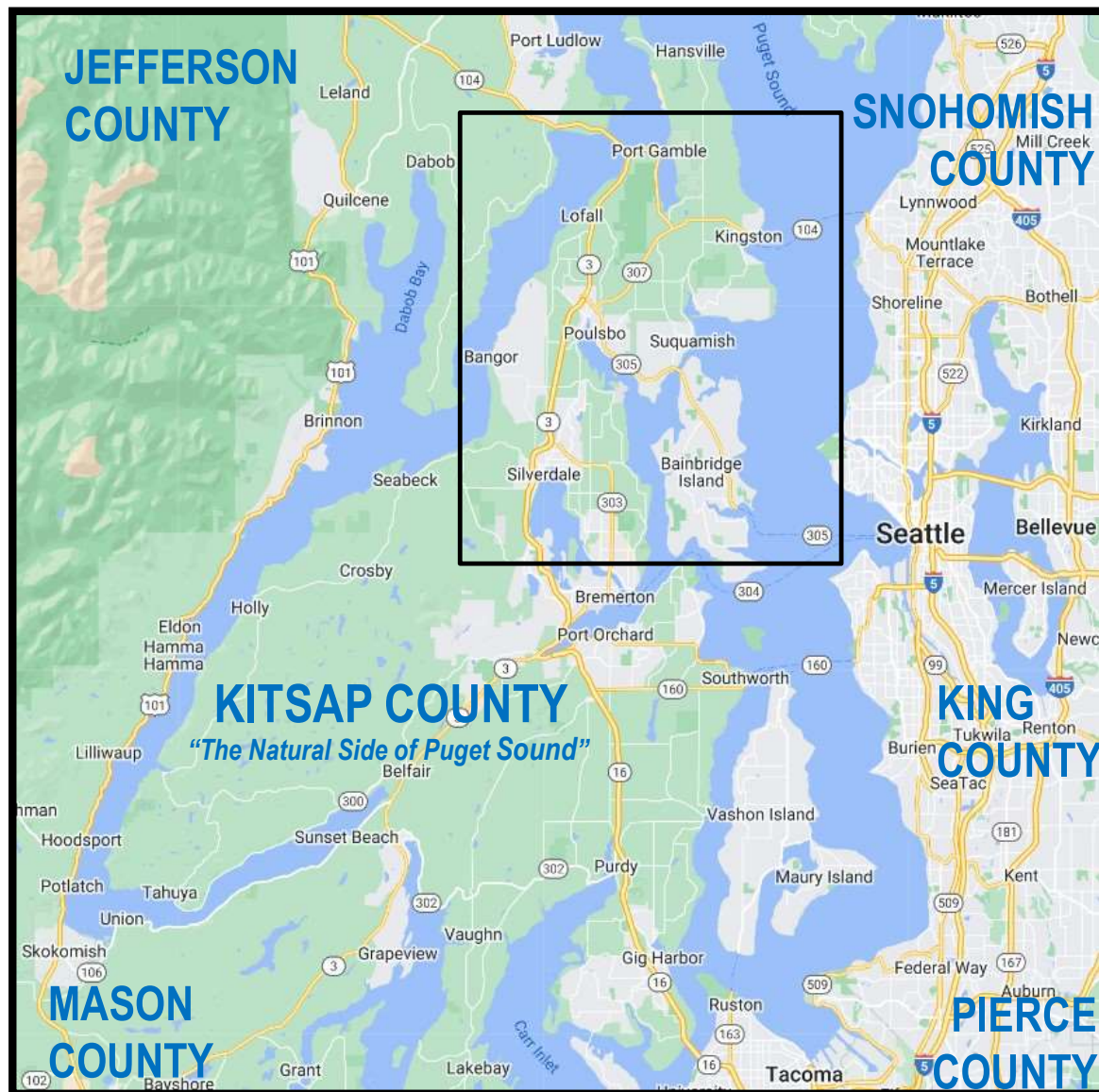




# SHARE THE ROAD IN NORTH KITSAP







S'Klallam Nation



Parks,  
Community  
Forest & Open  
Space

Suquamish  
Nation



NORTH KITSAP





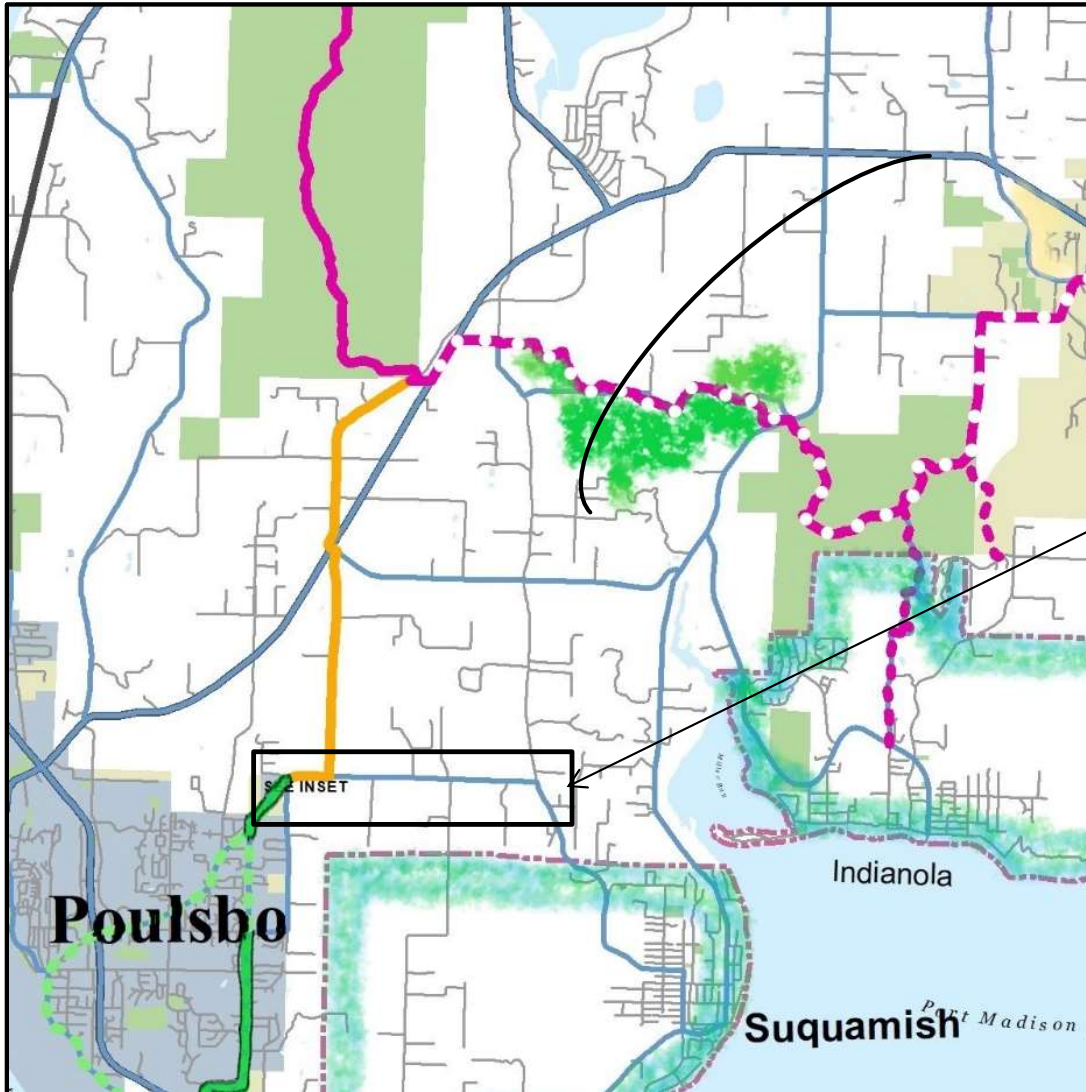
DECREASE MPH IN RURAL NORTH  
KITSAP COUNTY ON PROPOSED  
BICYCLE CORRIDORS



REDUCED VEHICLE SPEED OR SHARE THE ROAD SIGNAGE FOR INCREASED SAFETY



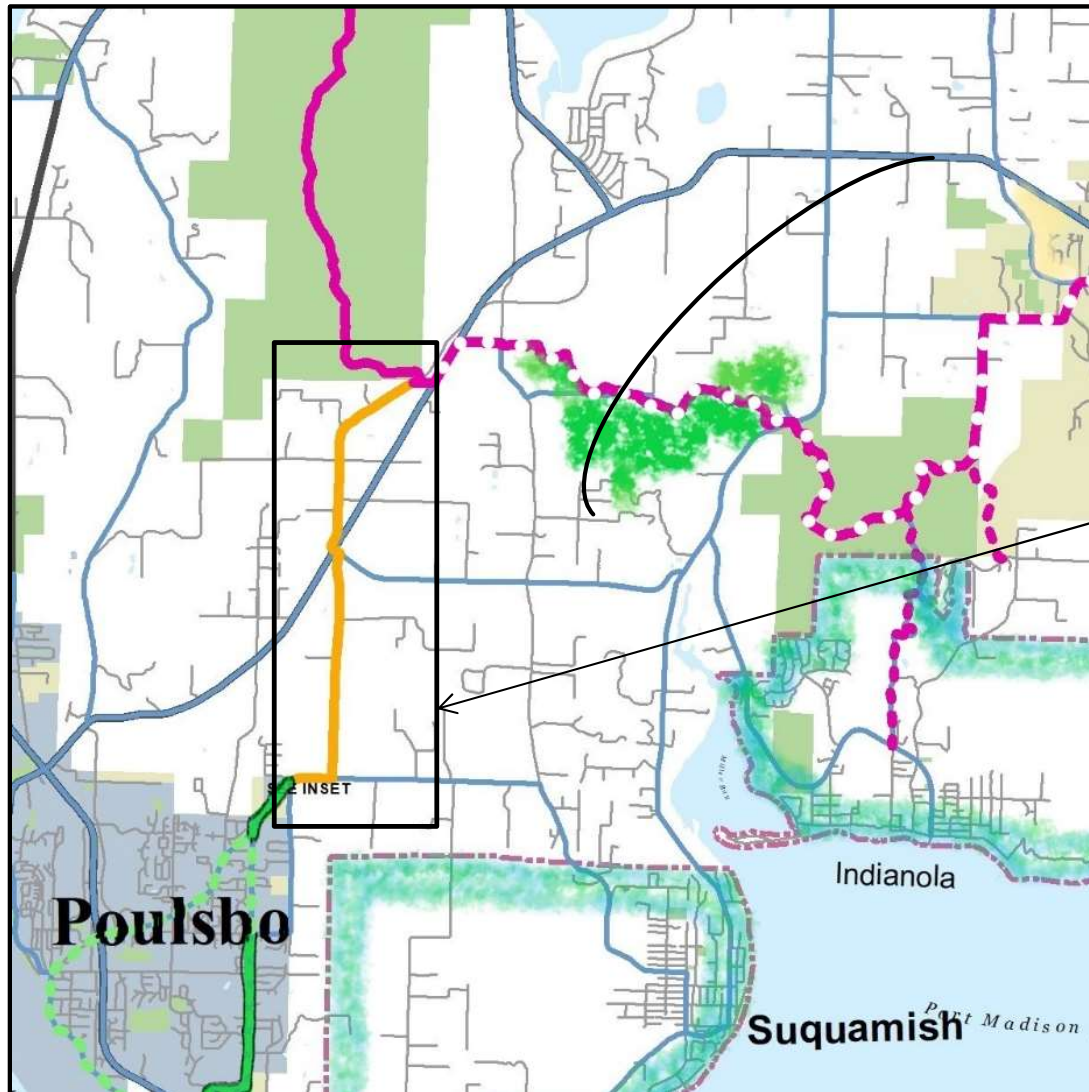




## LINCOLN ROAD LINKING RURAL COMMUNITIES



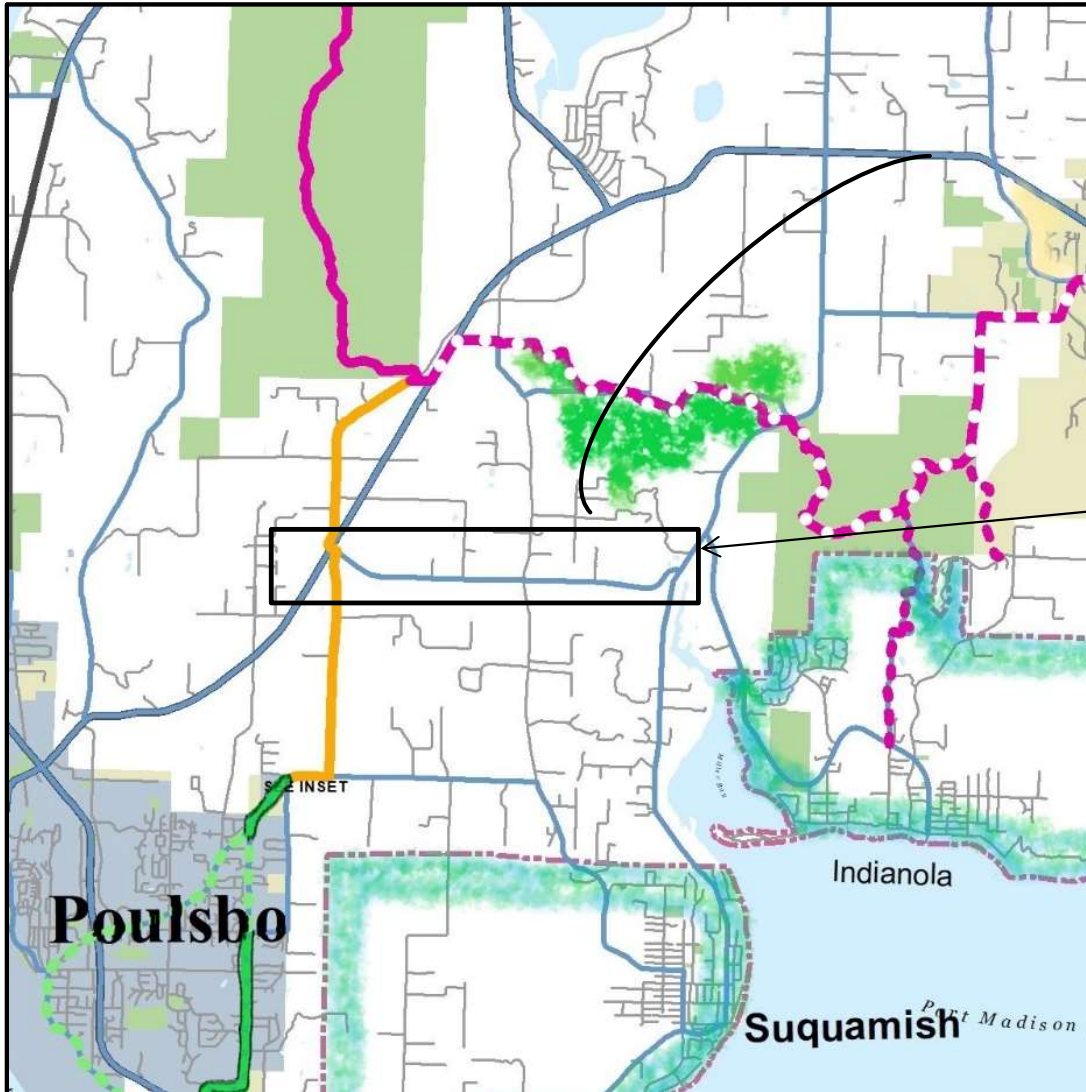




## STOTTEMEYER ROAD LINKING RURAL COMMUNITIES



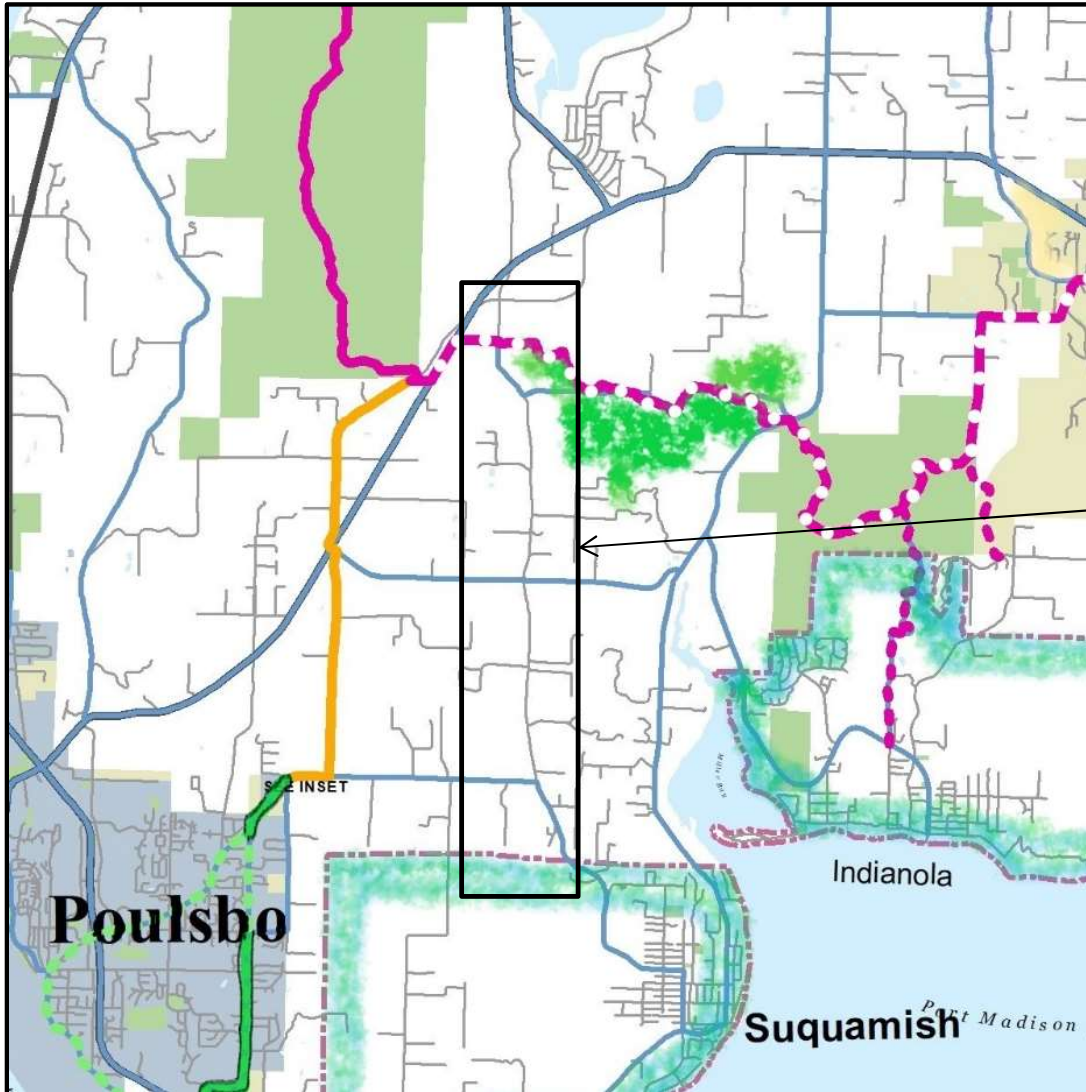




## GUNDERSON ROAD LINKING RURAL COMMUNITIES







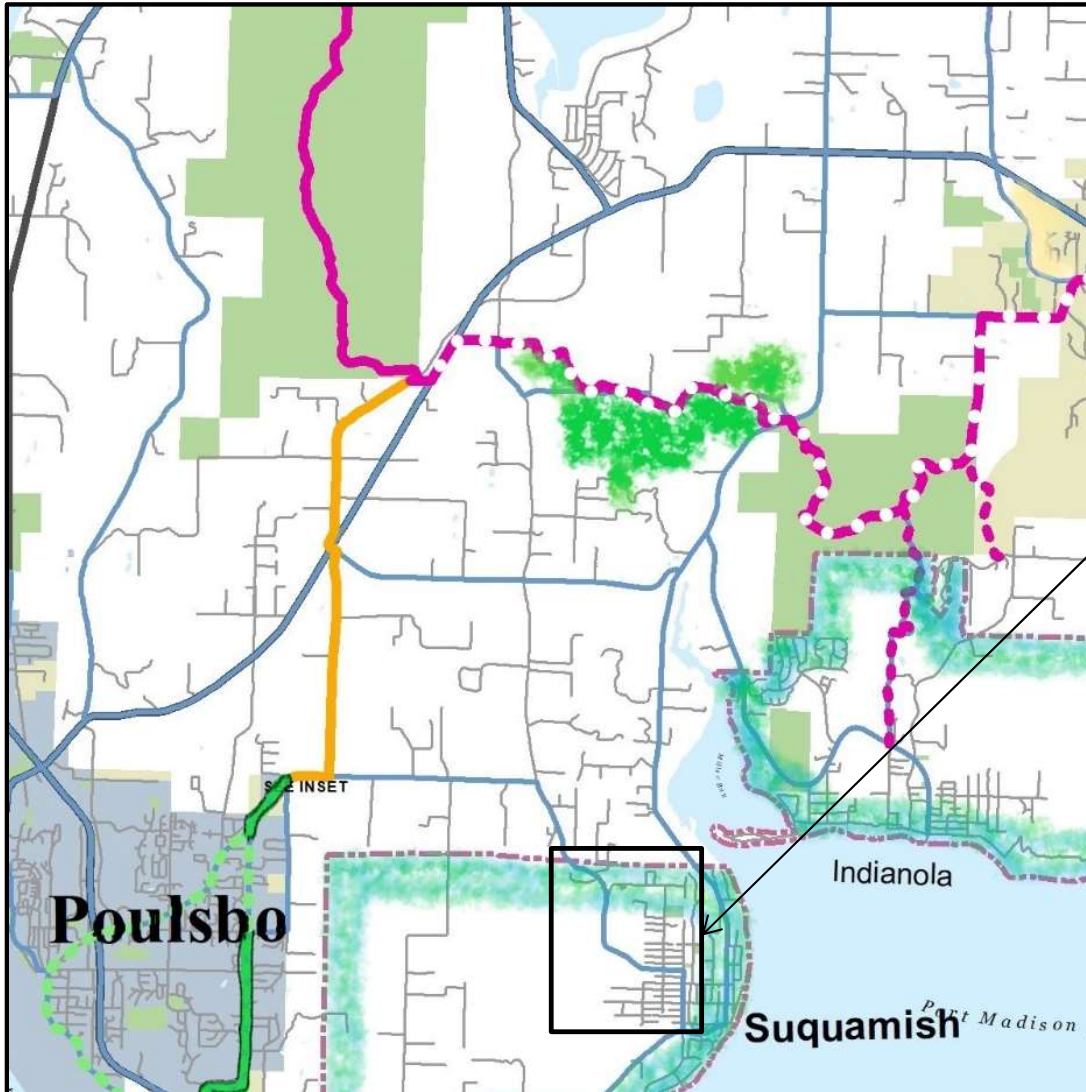
## PORT GAMBLE-SUQUAMISH ROAD

### LINKING RURAL COMMUNITIES

- HISTORIC ROUTE (SKID ROAD)



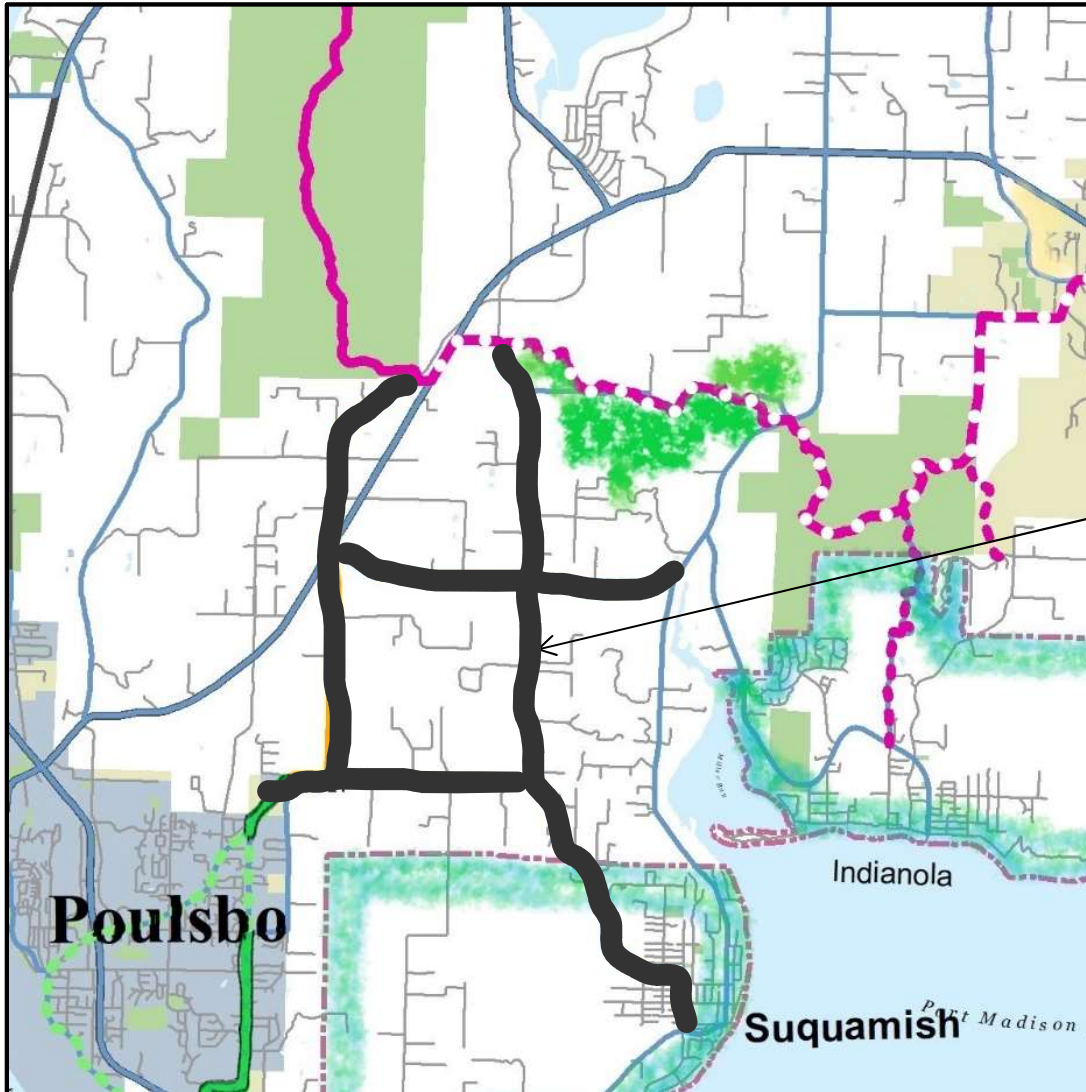




## PORT GAMBLE-SUQUAMISH ROAD TO COLUMBIA LINKING RURAL COMMUNITIES



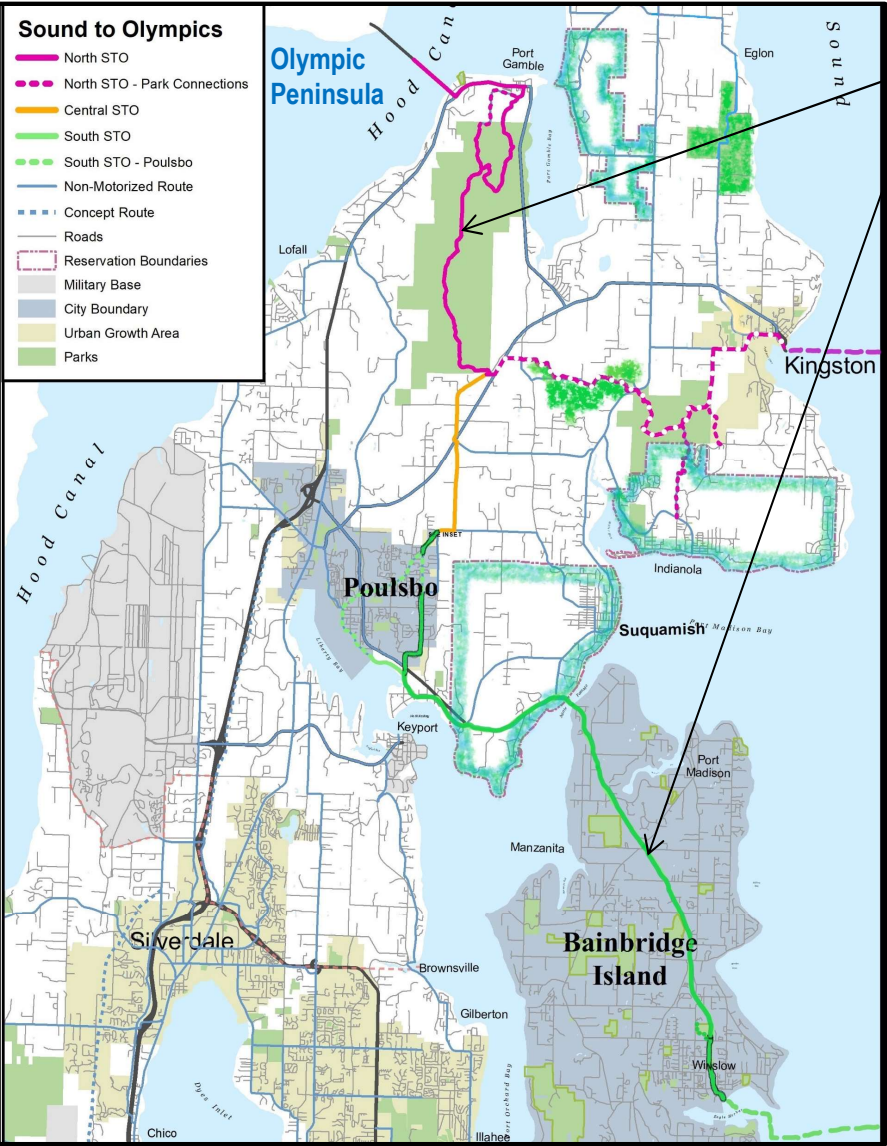




## SHARE THE ROAD BIKE CORRIDORS LINKING RURAL COMMUNITIES







# SOUND TO OLYMPICS (STO) TRAIL

## LINKING COMMUNITIES, PARKS & OPEN SPACE



## SHARE THE ROAD BIKE CORRIDORS

- LINKING RURAL COMMUNITIES
- PUBLIC SAFETY



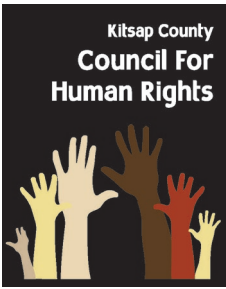


# Thank You



[Return to Comment Matrix](#)





**Council for Human Rights**

Augustine Lujan, Chair  
Rochelle Karlsen  
Elizabeth Holmes  
Jim Manlove  
Erika Anderson  
Kirsten Dahlquist  
Cris Amburgey  
Kirsten Dahlquist  
Shannae Peters  
Nicola D'Anella  
Barbara Dennis  
Jeffrey Hora  
Morgan Pasquier  
Wilder Kruzan

**Vision**

Kitsap County shall be a caring, supportive, and safe community for all its citizens—a community which values each individual, celebrates individual differences, and recognizes the importance of each person's contribution.

**Mission**

The mission of the Kitsap County Council for Human Rights is twofold:  
1) To advise county government and Kitsap County residents on issues related to discrimination, violence and harassment based on race or national origin, religion, age, gender, gender expression, sexual orientation, disability, or economic status;  
2) Promote the equitable treatment of all citizens and reduce prejudice through education, resource referrals, and advocacy.

**Board of  
County Commissioners**

Christine Rolfes  
Charlotte Garrido  
Katherine Walters



# KITSAP COUNTY COUNCIL FOR HUMAN RIGHTS

Commissioners' Office, 614 Division Street, MS-4, Port Orchard, WA 98366

<https://kcowa.us/chr>

[kitsapcouncilhumanrights@gmail.com](mailto:kitsapcouncilhumanrights@gmail.com)

March 28, 2024

Department of Community Development

Planning and Environmental Programs

614 Division St, MS-36

Port Orchard, WA 98366

Email: [compplan@kitsap.gov](mailto:compplan@kitsap.gov)

Subject: Kitsap County Council for Human Rights – Comments 2024 Kitsap County Comprehensive Plan Draft

To Whom it May Concern:

These comments reflect how the Comprehensive Plan Draft contributes to the promotion and protection of human rights for residents of Kitsap County. General comments, as well as specific comments for the Land Use, Transportation and Housing section are as follows.

Outstanding questions about the equitable collection of data from our community during the Comprehensive Plan Update process:

- It is unclear to the KCCHR how outreach was conducted about the Comprehensive Plan Update to acquire information specifically from BIPOC communities. Please provide additional information.
- It is unclear to the KCCHR which community groups have been invited to participate in outreach, including virtual/in person public meetings, community advisory council public meetings on the Comprehensive Plan Update. Please provide additional information.
- It is unclear to the KCCHR if BIPOC communities have been compensated for their time providing input in the Comprehensive Plan Update. Please provide additional information.
- It is unclear to the KCCHR if the county hired a third-party Equity Consultant to assist in development of the Comprehensive Plan Update. Please provide additional information.

Overarching comment about the Comp Plan Update:

- The Comprehensive Plan appears to be only currently available in English language format. This is an immense barrier to participation in this process and understanding of the proposed changes to our community. It is a human right to participate in civic engagement (article 21 of UDHR) as well as freedom of opinion and expression (article 19 of UDHR). As a result, non-English speaking residents of Kitsap County are being intentionally excluded from the Comprehensive Plan Update process.

## Land Use Section

### Page Specific Comments:

- Page 32 - States goal of Full and Equal Access including racial equity assessment tools and expanded community outreach – Encouraging to see language that speaks to engaging folks that may not have been previously included in the process. This contributes to the human right to freedom of association and the right to participate in civic affairs (article 20 and 21 of Universal Declaration of Human Rights). KCCHR looks forward to hearing more about the policies that support increased citizen engagement.
- Page 33 - Mentions understanding land use decision impacts through Social Determinants of Health (non-medical factors that influence health outcomes) to improve health outcomes - Encouraging to see language that supports the human right of health (article 25 of Universal Declaration of Human Rights). KCCHR looks forward to hearing more about the policies that support increased health outcomes.
- Page 33 also mentions removing barriers to expansion of medical and healthcare for seniors and underserved communities - Encouraging to see language that supports the human right of health (article 25 of Universal Declaration of Human Rights). KCCHR looks forward to hearing more about the policies that support removing barriers to medical and healthcare.
- Page 34 - Speaks to food security, food systems, and public health - Encouraging to see language that supports the human right of health (article 25 of Universal Declaration of Human Rights). KCCHR looks forward to learning more about the policies that support increased access to healthy food.
- Page 45- Consider development patterns that reduce sprawl. Language isn't strong enough— revise to move towards eliminating urban sprawl as it increases reliance on cars, proliferates car dependent communities, increases greenhouse gas emissions, encroaches on natural habitat, etc. Eliminating urban sprawl supports the human right of a healthy environment for present and future generations (article 25 of Universal Declaration of Human Rights). KCCHR looks forward to hearing more about the policies that support eliminating urban sprawl in Kitsap County.

## Transportation Section

### General comments:

- City of Bremerton and Naval Base Kitsap recently created the Joint Compatibility Transportation Plan (JCTP). There is no mention of the JCTP in this section.

### Page Specific comments:

- Page 106, 106 - Speaks to equitable public participation in multi-modal transportation planning recognizing and minimizing negative impacts to people of color, people with low-incomes, and people with special transportation needs - includes groups commonly left out of the process and who need transportation the most. This contributes to the human right to freedom of movement and the right to participate in civic affairs (article 13 and 21 of Universal Declaration of Human Rights). KCCHR looks forward to hearing more about the policies that support increased citizen engagement.
- Page 108 - Complete Streets, emphasize access for all ages and abilities, safety, and providing access to and linking land uses and activity areas within and between communities, public facilities, parks, and open space - supports freedom of movement human right (article 13 of Universal Declaration of Human Rights). KCCHR looks forward to hearing more about the policies that support more Complete Streets.
- Page 110 - Transit service will be provided to rural areas - no mention of walk, bike or roll facilities to rural areas.

## **Housing Section**

General comments:

- Overall, there were no concerns about human rights noted in this section.
- However, it is unclear how is the information about programs related to housing, affordable housing, rental assistance, etc being distributed to community members. Please provide additional information.

[Return to Comment Matrix](#)



Kitsap County Planning Commission  
619 Division Street  
Port Orchard, WA 98366

Dear Kitsap County Planning Commission:

Re: 2024 Comprehensive Plan Update – Public Comments

We wanted to bring to your attention three parcels within the Ruby Creek neighborhood of Port Orchard, which we believe should be included within the City of Port Orchard UGA: **Parcels 102301-1-041-2005, 102301-1-005-2009, and 102301-1-006-2008**. The inclusion of said parcels would enable the Ruby Creek Neighborhood to be developed as envisioned in the City of Port Orchard's 2016 Comprehensive Plan and its 2020-adopted Ruby Creek Neighborhood Subarea Plan.

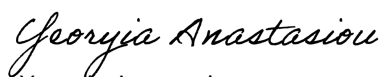
The parcels ending in -2009 and -2008 are currently the only parcels within the Ruby Creek neighborhood that front Sidney Road SW but that are *not* included in the City UGA. This poses challenges to fulfilling the City's Ruby Creek Neighborhood planning goals, as it leaves a nearly 600-foot section of the Sidney Road SW frontage outside of the City's jurisdiction. This complicates the ability of the parcels in question to meet City road improvement standards that the rest of the parcels within the corridor are held to. Thus, their exclusion hinders the ability for the neighborhood to develop its desired sidewalks, storm system, etc.

Adjacent to the parcels in question is Parcel No. 102301-1-053-2000, which we have entitled with the City of Port Orchard to build a rental townhome community, under the project name Haven Townhomes. However, the current UGA boundaries mean that the Haven Townhomes parcel is on an "island", surrounded by parcels excluded from the UGA. To ensure the future walkability of the Ruby Creek Neighborhood corridor, the adjacent parcels referenced above should be included within the City's UGA.

Additionally, making this adjustment to the UGA boundaries might make multifamily development along the Sidney Road SW corridor more feasible. The Haven Townhomes parcel -2000 is the narrowest parcel (from West to East) along the corridor, making it difficult to develop into a multifamily project, as envisioned in the City's Ruby Creek Subarea Plan. Were parcel -2005 to be included within the UGA, this would present the additional developable area that could better facilitate a multifamily project at the corner of Glenwood Rd. and Sidney Rd.

Thank you very much for your consideration. We have included an extract from the Kitsap County GIS Map for reference. Please, don't hesitate to reach out with any questions by phone or email.

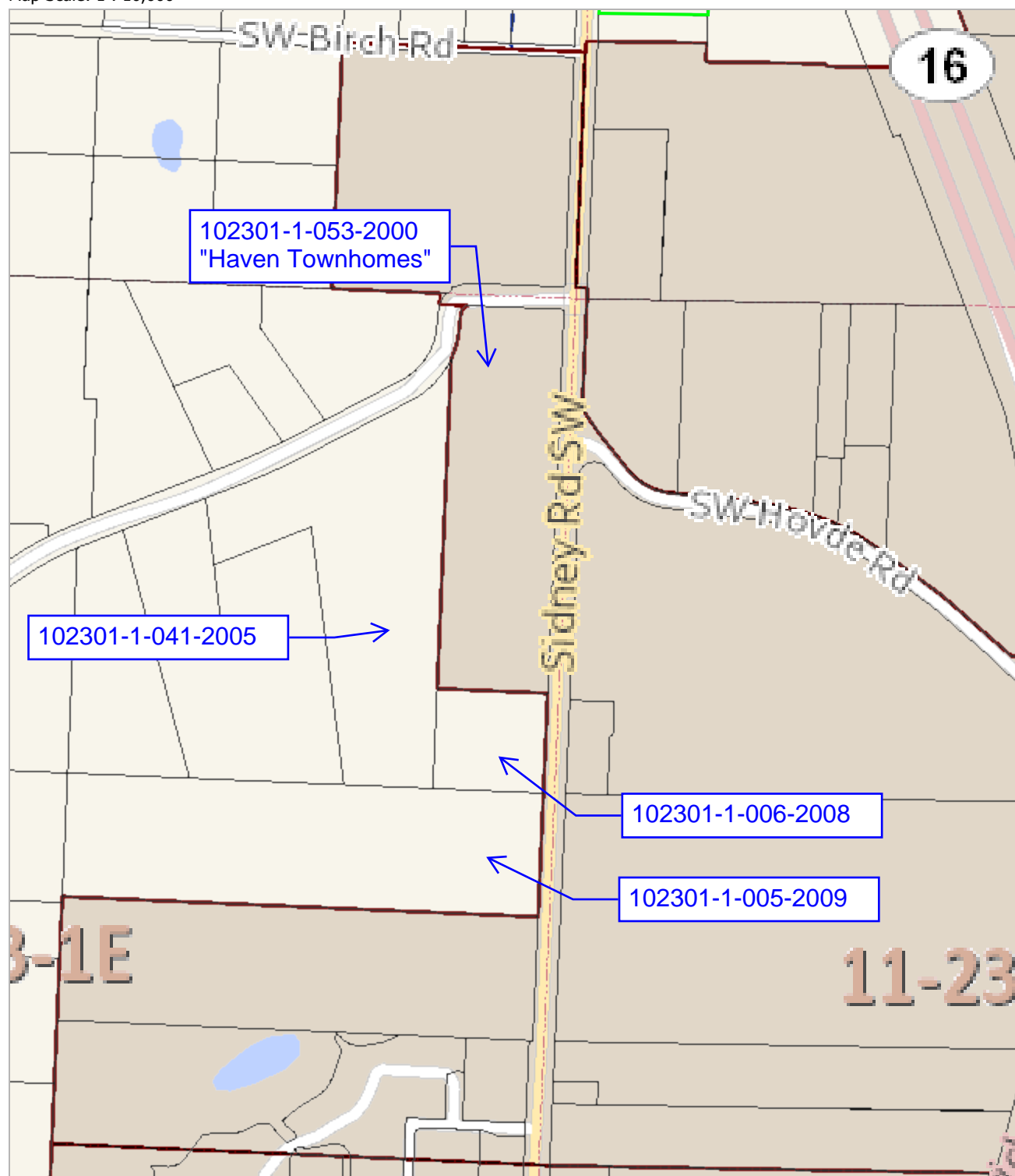
Sincerely,



Georgia Anastasiou  
Development Manager  
Encl.

Map Scale: 1 : 10,000

Printed: Monday, Apr 1, 2024



\*\* This map is not a substitute for field survey \*\*

0 200 400ft



Comments

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April 4, 2024

Board of County Commissioners  
Kitsap County Commissioner's Office  
614 Division St. MS - 4  
Port Orchard, WA 98366

**RE: Comment on Draft Development Regulations Title 17 – Zoning**

Dear Board of Commissioners:

Leeward Renewable Energy offers this comment to request an amendment to Kitsap County Code (“KCC”) 17.110.640 to include battery energy storage in the definition of Public Facilities. This amendment to the Development Regulations would streamline the permitting and siting of facilities that support the use of zero-emission renewable energy projects, thereby advancing Kitsap County’s energy reliability, climate change, and greenhouse gas emissions goals.

**I. Revision to “Public facilities” as Defined at KCC 17.110.640**

Kitsap County is currently updating its Comprehensive Plan, and as part of that process it has released draft revisions to the Development Regulations. The draft Development Regulations contain a number of revisions to the definitions in Title 17, and Leeward proposes an additional revision to the definition of Public Facilities, found at KCC 17.110.640. As currently drafted, the definition of Public Facilities does not clearly encompass the technologies used to incorporate renewable generating assets into the grid. A minor revision to the definition of Public Facilities would correct this omission.

Leeward proposes the following revision to KCC 17.110.640 to include battery energy storage in the definition of “Public facilities”:

“Public facilities” means streets, roads, highways, sidewalks, street and road lighting systems, traffic signals, domestic water systems, storm and sanitary sewer systems, waste handling facilities designated as public facilities in the comprehensive solid waste management plan, parks and recreational facilities, schools, public works storage facilities and road sheds, and utilities such as power, battery energy storage, phone and cable television.



## **II. The Revision Would Support the Goals in Kitsap County's Comprehensive Plan**

Leeward believes that a minor revision to the Development Regulations would significantly benefit Kitsap County by helping to advance the County's goals relating to energy reliability, greenhouse gas emissions reduction, and climate change.

Kitsap County's draft Comprehensive Plan sets important goals to address the challenges of climate change and energy reliability. For instance, Climate Change Policy 14.3 seeks to "promote cost-effective renewable low-carbon energy generation," and Climate Change Strategy 14.e aims to "explore programs and incentives for businesses and organizations to implement small-scale renewable energy production and storage at their properties." Climate Change Goals also include reducing greenhouse gas emissions consistent with the regional goal. Climate Change Policy 13. These goals align with the state-wide goal to transition the state's electric supply to 100% carbon neutral by 2030.<sup>1</sup>

Additionally, the Capital Facilities and Utilities Policies in the draft Comprehensive Plan promote the wider adoption of renewable energy generation and resources by, for instance, encouraging "alternative energy production as appropriate in urban and rural areas that are consistent with their respective zoning." Capital Facilities and Utilities Policy 12.2. These policies also are intended to "[s]upport necessary energy generation and redundant facilities to serve the Kitsap Peninsula." Capital Facilities and Utility Policy 12.4. The Keyport Policy 20.2 seeks to "Promote Solar, Wind, Tidal, Wave Generation and other renewable energy generation infrastructure to serve the Keyport Community." Finally, the draft Comprehensive Plan also articulates a strategy of coordinating with utility providers to enhance service quality and reliability. See Capital Facilities and Utility Strategy 7.b.

Revising the definition of Public Facilities to include battery energy storage will facilitate all of the County's goals with respect to climate change, greenhouse gas emission reduction, and energy reliability by allowing for wider use of renewable energy generation. Renewable energy generation, such as wind and solar, provides an emission-free source of energy. However, renewable generating assets can face issues related to intermittency and variation. A cost effective solution to these issues is the use of battery energy storage to store excesses energy for deployment when most needed. Battery back-up is a key component to the widespread adoption of renewable generating technologies, and it is a critical component of any energy policy that seeks to reduce the use of fossil fuels by utilizing non-emitting renewable generating sources.

Battery energy storage also plays a key role in providing grid stability. By having deployable energy resources on hand, electric service interruptions due to weather or other issues affecting the grid can be mitigated. In this way, battery energy storage increases the grid's reliability and

<sup>1</sup> See RCW 19.405.010.

resilience. These resources help to prevent widespread power outages and to balance the demands on the grid.

Amending the definition of Public Facilities in the Development Regulations to include battery energy storage would provide much needed clarity on how these facilities should be incorporated into Kitsap County's overall development program. The amendment would confirm that battery energy storage plays an important role in the County's energy reliability and climate change program, and would provide necessary flexibility for the siting and development of these facilities.

Leeward firmly supports Kitsap County's goals with respect to emissions reduction and energy resiliency. A minor amendment to the Development Regulations to explicitly incorporate battery energy storage into the County's development program would provide major benefits to the County's residents and the County's energy and climate resilience planning.

Sincerely,

A handwritten signature in black ink that reads "JD Brannock". The signature is written in a cursive, flowing style.

JD Brannock, Director of Energy Storage  
Leeward Renewable Energy

[Return to Comment Matrix](#)

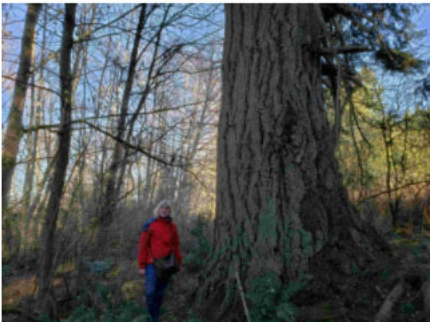
# Kitsap County to accept reclassification requests for 2024 Comprehensive Plan update

Rob Christiansen  
6750 NE KOURA RD  
Bainbridge Island, WA 98110  
(206) 497-7060 - robchristiansen2@gmail.com  
Parcels in question: [332702-4-004-2002] & [332702-4-005-2001]

**THIS PROPOSAL SUPERSEDES ALL OTHER PREVIOUS ONES. THROW THE PREVIOUS ONES AWAY AND REPLACE THEM WITH THIS ONE.**

My one parcel, which I refer to as "Ranch-South," used to be a bridal rink, where they would board people's horses - a big, open grassland. There used to be a house/office on top of the hill, but that has long since rotted away. There used to be a barn there as well. Considerably newer, it is now all but gone. At the present time these two parcels are zoned one house per 20 acres. It's my desire to rezone both parcels one house per 10 acres, or maybe 1/5. This is 37 acres of beautiful land and I have no intention of selling for the foreseeable future.

You don't see too many Doug Fir anymore. Center are the remains of the old barn. I remember as a kid that was standing strong and solid. Right is from Heritage Park parking lot looking south across my other parcel, "Ranch-North."



## PARCEL #1

**Project information** Email address to receive your completed required permit questionnaire  
robchristiansen2@gmail.com

**Parcel number:**

332702-4-005-2001 - "Ranch South" - 20.5 acres

**Current zoning =** 1 house per 20 acres

**Proposed zoning =** 1/10 or 1/5

**Select one of the following that best describes your request:**

Rezone from 1 house per 20 acres, to 1 house per 10 acres or 1 house per 5 acres. At this time I have no plans to do anything with this land, only to rezone it.

**Please describe how the proposed rezone is consistent with the purpose and interests of the comprehensive plan, respective community or sub area plan or other applicable regulations**

No one likes to see it, least of all myself, but the county is growing and there will be a need in the future for property less than 20 acres in size. But as I say I have no plans to do anything with this land.



**Please describe how the proposed rezone will not adversely affect the surrounding community:**

There will be no effect whatsoever

**Please describe how the proposed rezone bears a substantial relationship to the public health, safety or welfare of the community:**

I emphasize that today there is already a shortage of housing in Kitsap County. Hard-working Americans can not afford a 10 acre parcel - much less a 20. And increasing the density to 5 acre parcels is not exactly what I would call urban blight.

**Utility and Sewage additional contact information:**

This parcel used to be a business, they would board people's horses. I would estimate it's 85% cleared grassland.

**Water source:**

There might be a well on this parcel, but I don't know where it would be.

**Sewage disposal system**

There might be a septic system on this parcel, but I don't know where it would be.

## PARCEL #2

**Project information** Email address to receive your completed required permit questionnaire

robchristiansen2@gmail.com

**Parcel number:**

332702-4-004-2002 - "Ranch North" - 16.5 acres

**Current zoning =** 1 house per 20 acres

**Proposed zoning =** 1/10 or 1/5

**Select one of the following that best describes your request:**

Rezone from 1 house per 20 acres, to 1 house per 10 acres or 1 house per 5 acres. At this time I have no plans to do anything with this land, only to rezone it.

**Please describe how the proposed rezone is consistent with the purpose and interests of the comprehensive plan, respective community or sub area plan or other applicable regulations**

No one likes to see it, least of all myself, but the county is growing and there will be a need in the future for property less than 20 acres in size. But as I say I have no plans to do anything with this land.

**Please describe how the proposed rezone will not adversely affect the surrounding community:**

There will be no effect whatsoever

**Please describe how the proposed rezone bears a substantial relationship to the the public health, safety or welfare of the community:**

I emphasize that today there is already a shortage of housing in Kitsap County. Hard-working Americans can not afford a 10 acre parcel - much less a 20. And increasing the density to 5 acre parcels is not exactly what I would call urban blight.

**Utility and Sewage additional contact information:**

This parcel is totally undeveloped land.

**Water source:**

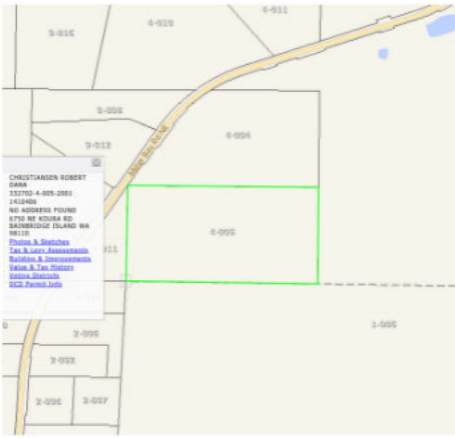
Individual well, but on this parcel I don't think there is one.

**Sewage disposal system**

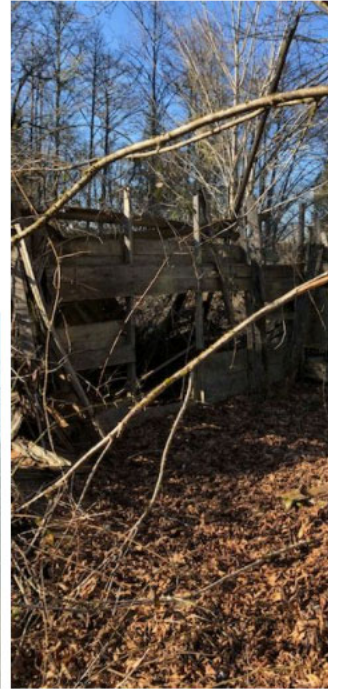
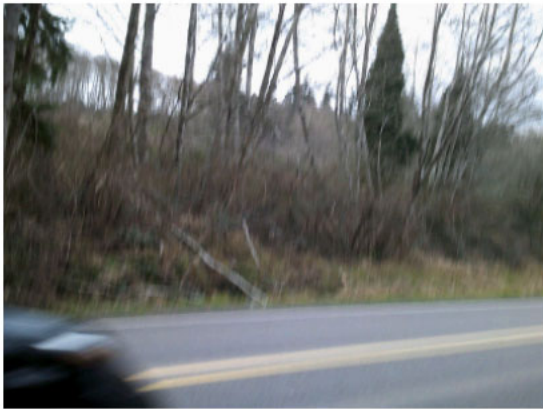
Individual septic system, but on this parcel I don't think there is one

---

Ranch-South is delineated by the green line. Ranch-North, my other parcel, is directly to the north of it.



Left is from Miller Bay road looking SE across my land. Center is looking west the other way across the neighbor's land. And right, once again, is the old barn. >



I want to reiterate that at this time I have no plans to develop this land, I only wish to change the zoning from the present 1-house-per-20-acres, to 1 house per 10 acres or maybe 1/5 acres. Here is my sister in Ranch-South.



[Return to Comment Matrix](#)





April 2, 2024

Dear Kitsap County Board of Commissioners,

Ueland Tree Farm (UTF), a 2,000+ acre family-owned tree farm located in central Kitsap County, makes the following submission in advance of the Board of Commissioners April 8<sup>th</sup> Public Hearing on the Comprehensive Plan.

UTF's original request was to change 168.42 acres from rural residential to industrial zoning. This included the original Kitsap Quarry's 61.54 acres and an additional 106.88 acres (parcel numbers 202401-3-002-2005 and 202401-2-050-2008). The proposed uses for parcel 202401-3-002-2005 include the permitted soil facility and the proposed power plant. The proposed uses for 202401-2-050-2008 include a laydown yard and alternative location for the soil facility.

The County's current Preferred Alternative includes 47.86 acres of our initial request (three of the five original Kitsap Quarry parcels: 202401-3-004-2003, 202401-2-024-2001, 202401-2-012-2005).

***We know the Board of Commissioners must balance many requests and is limited in its ability to add industrial land. Consequently, we are amending our previous submission and request adding only parcel 202401-3-002-2005 to the existing Preferred Alternative. This parcel is needed for the proposed power plant under all scenarios being discussed with our lessee and is already permitted for a soil facility, another industrial use.*** This parcel is adjacent to and directly west of Kitsap Quarry and adjacent to and directly east of a parcel already in the City of Bremerton (see enclosed map) and includes over 1,400 feet of rail access.

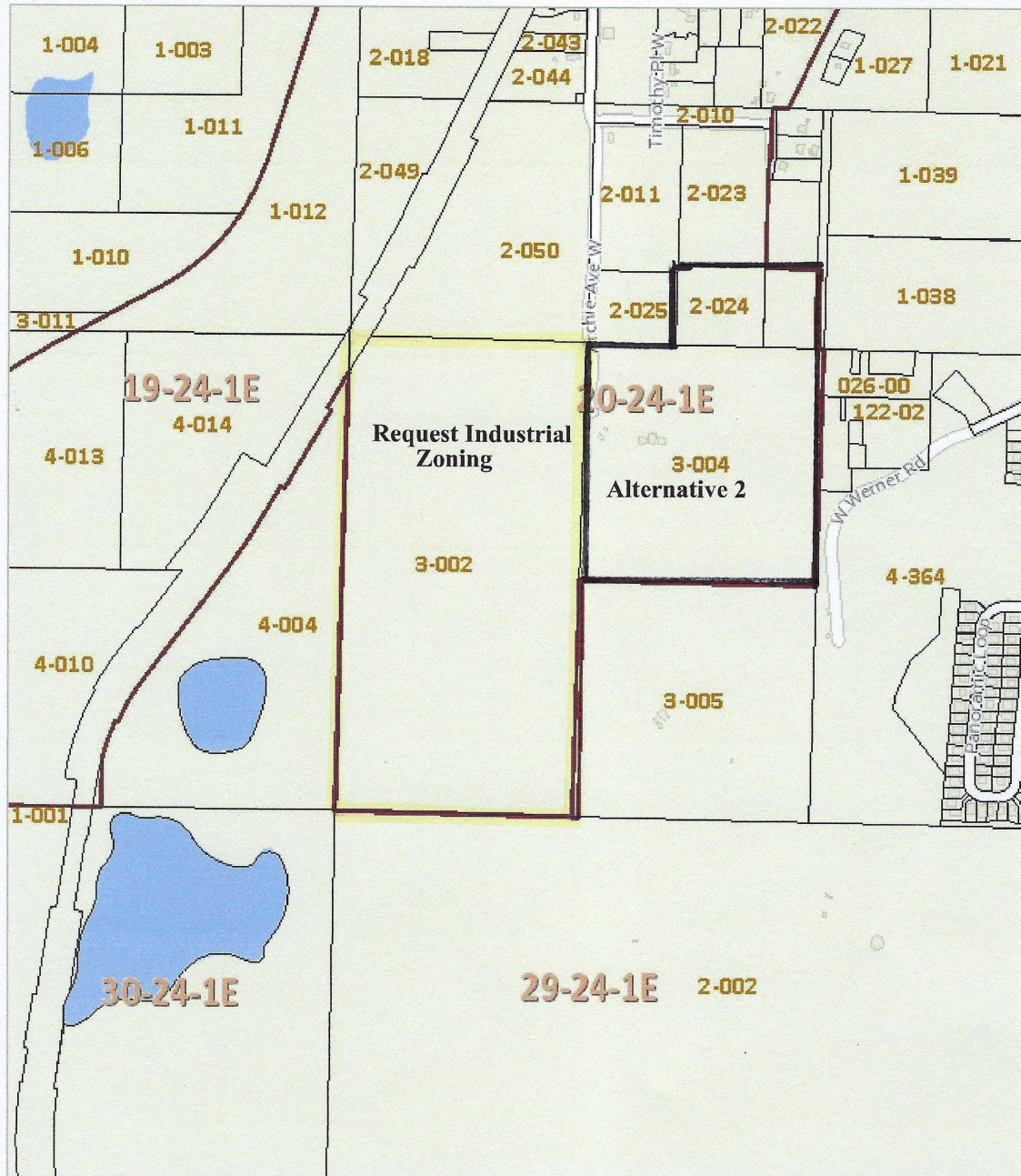
The County is aware that the useable acreage in this parcel is approximately half of its 79.67 acres because of critical areas, which will remain well protected. If required, UTF is also willing to have the Preferred Alternative industrial zoning removed from the two smaller Kitsap Quarry parcels (202401-2-024-2001, and 202401-2-012-2005), which are important but less essential than industrial zoning for parcel 202401-3-002-2005.

Mark Mauren  
Chief Operating Officer  
Ueland Tree Farm



Map Scale: 1 : 24,000

Printed: Wednesday, Apr 3, 2024



\*\* This map is not a substitute for field survey \*\*

0 500 1000ft



\*Kitsap County Alternative 2 ●  
\*Request adding back in parcel 202401-3-002-2005 to the existing preferred alternative ●



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April 5, 2024

Mr. Scott Diener  
Kitsap County  
Department of Community Development  
Planning and Environmental Programs  
614 Division Street, MS-36  
Port Orchard, WA 98366

Sent via email to: [compplan@kitsap.gov](mailto:compplan@kitsap.gov)

Dear Mr. Diener:

The Washington State Department of Transportation (WSDOT) Olympic Region appreciates the opportunity to review and comment on Kitsap County's (County) Draft Comprehensive Plan (Plan).

WSDOT acknowledges the substantial effort by the County to address housing, climate change and resilience. WSDOT shares the County's vision to support alternatives that endorse growth in areas that are already near public transportation and multi-modal options (Housing Policy 1.1). WSDOT commends the County on proactively including Complete Streets and the Climate Change Element.

In general, WSDOT concurs with the Kitsap Comprehensive Plan Update Planning Commission Recommendation (released March 26, 2024) to support Alternative 2 within the Preferred Alternative. WSDOT agrees with the emphasis of limiting UGA expansions to those that increase housing diversity and focus on missing middle housing.

WSDOT offers the following additional comments regarding the Plan:

- **Content & Organization.** WSDOT supports the Puget Sound Regional Council (PSRC) comment in their February 26, 2024, letter suggesting revisions to information spread across documents. WSDOT recommends the County to consider aggregating and cross-referencing technical transportation information and policies.
- **Urban Growth Areas.** WSDOT supports policies and plans that accommodate projected urban growth in a compact land use pattern. Such compact and efficient land use is a strategy to reduce impacts on the state highway system and would address the VMT increases as an unavoidable significant impact across alternatives. WSDOT concurs with PSRC's comment that expansion should be well-documented, especially in terms of growth first being located within existing UGA areas if capacity is



available (WAC 365-196-310 and WAC 365-196-320). In addition to or in lieu of UGA expansion, WSDOT requests the County consider additional land use strategies with higher density land use classifications within existing UGAs to accommodate housing capacity.

- **Vehicle Miles Traveled (VMT).** WSDOT recommends exploring VMT reduction policies and adding these to the Periodic Update. Given the emphasis on reducing greenhouse gases and VMT in Vision 2050 and RCW 36.70A.020, the County may choose to add a section specifically outlining policies and actions related to VMT reduction.
- **Active Transportation & Safety.** Areas with high density housing benefit from rich transit and active transportation facilities. WSDOT recommends policies for safety and active transportation that match the needs of high-density housing areas. Additionally, WSDOT appreciates the County's voluntary adoption of Complete Streets as a Plan Goal (Plan, Page 108), recognizing that Complete Streets is one step towards supporting active transportation. To understand WSDOT's approach towards the nexus of safety, vulnerable road users and Complete Streets, the County may refer to WSDOT's Vulnerable Road User Safety Assessment, 2023 report: [VRU-Safety-Assessment-2023.pdf \(targetzero.com\)](#) and the [Washington State Active Transportation Plan](#) for more information.

Thank you again for the opportunity to review the Comprehensive Plan. We look forward to continuing our productive partnership.

Sincerely,



George Mazur, P.E.  
WSDOT Olympic Region Multimodal Planning Manager

GM:gr

cc: Valerie Smith, Washington State Department of Commerce  
Maggie Moore, Puget Sound Regional Council  
Teri Chang, WSDOT Multimodal Planning and Data Division

[Return to Comment Matrix](#)

April 5, 2024

The Honorable Christine Rolfes  
The Honorable Charlotte Garrido  
The Honorable Katie Walters  
Kitsap County Board of Commissioners  
Kitsap County Commissioner's Office  
614 Division St. MS - 4  
Port Orchard, Washington 98366

Dear Commissioners Rolfes, Garrido, and Walters:

**Subject: Comments on the Kitsap Comprehensive Plan Update Planning  
Commission Recommendation Preferred Alternative**

Sent via email: [compplan@kitsap.gov](mailto:compplan@kitsap.gov); [Kitsapcommissioners@kitsap.gov](mailto:Kitsapcommissioners@kitsap.gov)

Thank you for the opportunity to comment on the Draft Kitsap County Comprehensive Plan 2024. Futurewise strongly supports the update. Overall, we support the Planning Commission recommendation provided that it includes important fixes to address community concerns, regional policies, and state law. We have additional comments on the Planning Commission recommendation below. We first summarize them and then provide more detailed recommendations in the following section.

Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. We have members across Washington State including Kitsap County.

## Summary of our Comments

- Futurewise supports the Planning Commission recommendation without the proposed urban growth area expansions and with some additional features. This alternative is more likely to reduce greenhouse gas pollution, allow more affordable and middle-income housing, and to be affordable to taxpayers and ratepayers.
- The comprehensive plan must reduce greenhouse gas pollution consistent with VISION 2050. This will reduce adverse impacts on water supplies, fish and wildlife habitat, flooding, and the environment. Please see page 3 of this letter for more information.

- Incorporate additional upzones within the existing urban growth areas to eliminate the need for UGA expansions. This will provide for more affordable housing and save taxpayers and ratepayers money. Please see page 7 of this letter for more information.
- The comprehensive plan should have stable urban growth areas consistent with VISION 2050. This will save taxpayers and ratepayers money and protect the environment. Please see page 8 of this letter for more information.
- Futurewise supports the Planning Commission recommended Tree Canopy Requirements. Tree canopies reduce heat related deaths, reduce storm water runoff, allow for ground water recharge which supplies much of the County's drinking water, and protects salmon habitat. See page 9 of this letter for more information.
- The comprehensive plan needs to reduce rural growth rates over time to achieve the Regional Growth Strategy rural population growth target of eight percent of the county's total population growth. This will save taxpayers and ratepayers money, reduce adverse effects on the environment, and reduce the adverse impacts of natural hazards. Please see page 5 of this letter for more information.
- The comprehensive plan should not include rural comprehensive plan amendments or upzones that increase rural population and employment capacity. Again, this will save taxpayers and ratepayers money, reduce adverse effects on the environment, and reduce the adverse impacts of natural hazards. Please see page 11 of this letter for more information.
- Futurewise supports Land Use Goal 7, Historic, archaeological, and cultural resources, and recommends the addition of a Land Use Strategy requiring pre-ground disturbance site investigations for sites where the state predictive model show cultural resources are likely or when requested by affected Native American Tribes and Nations. This will protect cultural sites from damage and reduce the potential for costly shutdowns for developments. Futurewise also recommends adding a strategy to protect historic landscape scale cultural resources. Please see page 13 of this letter for more information.
- Futurewise supports the Environment Element in the Comprehensive Plan. It will help protect the environment that benefits the community and fish and wildlife.
- The Environment Goals, Policies and Strategies should limit impervious surfaces and forest clearing, particularly outside urban growth areas to protect salmon habitat. This will help with salmon and steelhead recovery. Please see page 15 of this letter for more information.



- Futurewise strongly supports including the Climate Change Element in the Comprehensive Plan. The climate element will help the County reduce the severity of climate change and address the adverse impacts. We recommend that Climate Change Policy 5.1 also protect historic culturally important landscapes from climate impacts. See page 15 of this letter for more information.
- Please adopt policies and regulations to direct growth away from the Wildland-Urban Interface (WUI) and to encourage and require implementation of the Firewise Principles. This will protect people and property from wildfire and reduce burdens on firefighters. Please see page 16 of this letter for more information.
- Designate agricultural lands of long-term commercial significance in the Comprehensive Plan. This will help protect an important economic sector and provide for locally grown food. Please see page 17 of this letter for more information.
- The Growth Management Act requires water quantity policies and regulations as part of the 2024 comprehensive plan and development regulations update. These provisions will help protect senior water rights holders and protect salmon and steelhead and aid in their recovery. Please see page 18 of this letter for more information.
- Do not require parking for residential and mixed-use developments near transit stops with good existing or planned transit service. This will help reduce housing costs and promote infill development. Please see page 20 of this letter for more information.
- Please include information in the housing element or a background report identifying sufficient capacity of land for permanent supportive housing and affordable housing. This will help ensure that affordable housing can be successfully constructed. Please see page 23 of this letter for more information.

## Detailed Comments

**The comprehensive plan must reduce greenhouse gas pollution consistent with VISION 2050.**

We appreciate that the 2024 Comprehensive Plan Update Draft Environmental Impact Statement for Kitsap County (DEIS) projected greenhouse gas emissions

for the three alternatives. Unfortunately, the DEIS concludes that “[r]elative to 2019 greenhouse gas (GHG) emissions will increase under all three alternatives.”<sup>1</sup>

Increasing greenhouse gas emissions is inconsistent with VISION 2050. Comprehensive plans must be consistent multicounty planning policies.<sup>2</sup> VISION 2050 includes the following goal:

GOAL: The region substantially reduces emissions of greenhouse gases that contribute to climate change in accordance with the goals of the Puget Sound Clean Air Agency (50% below 1990 levels by 2030 and 80% below 1990 levels by 2050) and prepares for climate change impacts.<sup>3</sup>

Multicounty Planning Policy (MPP)-CC-11 provides “[s]upport achievement of regional greenhouse gas emissions reduction goals through countywide planning policies and local comprehensive plans.”<sup>4</sup> CC-Action-3, Policies and Actions to Address Climate Change, provides that:

Cities and counties will incorporate emissions reduction policies and actions that contribute meaningfully toward regional greenhouse gas emission goals, along with equitable climate resiliency measures, in their comprehensive planning. Strategies include land uses that reduce vehicle miles traveled and promote transit, biking, and walking consistent with the Regional Growth Strategy, developing and implementing climate friendly building codes, investments in multimodal transportation choices, and steps to encourage a transition to cleaner transportation and energy systems.<sup>5</sup>

<sup>1</sup> 2024 Comprehensive Plan Update Draft Environmental Impact Statement Kitsap County p. 1-8 (Dec. 2023) last accessed on April 3, 2024, at: [https://www.kitsap.gov/dcd/PEP%20Documents/121523\\_Kitsap%20County%20Comp%20Plan%20Update%20Draft%20EIS.pdf](https://www.kitsap.gov/dcd/PEP%20Documents/121523_Kitsap%20County%20Comp%20Plan%20Update%20Draft%20EIS.pdf).

<sup>2</sup> *West Seattle Defense Fund v. City of Seattle*, CPSGMHB Case No. 94-3-0016, Final Decision and Order (April 4, 1995), at \*55; *Friends of Pierce County, et al., City of Bonney Lake, and Marilyn Sanders, et al. v. Pierce County, and Orton Farms et al., City of Sumner, Bethell School District, Puyallup School District, and Forterra NW*, CPSRGMHB Case No. 12-3-0002c, Final Decision and Order (July 9, 2012), at 11 of 138.

<sup>3</sup> Puget Sound Regional Council, *VISION 2050: A Plan for the Central Puget Sound Region* p. 56 (Oct. 2020) last accessed on Feb 20, 2024, at: <https://www.psrc.org/planning-2050/vision-2050> and at the link on the last page of this letter with the filename: “vision-2050-plan.pdf.

<sup>4</sup> *Id.* p. 61.

<sup>5</sup> *Id.*

As you can see, the goal, multicounty planning policy, and action require the Kitsap County Comprehensive Plan to incorporate emissions reduction policies and actions that contribute meaningfully toward regional greenhouse gas emission goals. These goals are substantial. A comprehensive plan whose alternatives will increase greenhouse gas pollution is inconsistent with VISION 2050. The County must comply with the requirement that the comprehensive plan policies and actions must reduce greenhouse gas emissions. This the current draft does not do.<sup>6</sup>

We appreciate and support that the Planning Commission recommendation calls for incorporating the Puget Sound Regional Council Regional greenhouse gas emission targets.<sup>7</sup> Reducing the urban growth area expansions will help meet these targets but are likely not enough.<sup>8</sup>

To comply with VISION 2050, we recommend the following additional mitigation be included:

- Not approving comprehensive plan and zoning amendments that will increase greenhouse gas emissions. Amendments that increase greenhouse gas emissions include urban growth area expansions and rural capacity increases.<sup>9</sup>
- A peer-reviewed scientific paper has documented that to meet the necessary reductions in greenhouse gas pollution higher residential densities are

<sup>6</sup> 2024 Comprehensive Plan Update Draft Environmental Impact Statement Kitsap County p. 1-8 (Dec. 2023).

<sup>7</sup> *Kitsap Comprehensive Plan Update Planning Commission Recommendation Preferred Alternative* p. 8 (March 26, 2024) last accessed on April 3, 2024, at:

<https://www.kitsap.gov/dcd/PEP%20Documents/Comp%20Plan%20PC%20Pref%20Alt%20Recs%20032624%20%28002%29.pdf>.

<sup>8</sup> *Id.* pp. 2 – 3, p. 7.

<sup>9</sup> For the correlation between urban form and greenhouse pollution see Daniel Hoornweg, Lorraine Sugar, and Claudia Lorena Trejos Gomez, *Cities and Greenhouse Gas Emissions: Moving Forward* 5 URBANISATION 43, pp. 50 – 52 (2020) last accessed on Feb. 28, 2024, at:

<https://journals.sagepub.com/doi/pdf/10.1177/2455747120923557> and at the link on the last page of this letter with the filename: “hoornweg-et-al-2020-cities-and-greenhouse-gas-emissions-moving-forward.pdf.” Urbanisation is a peer reviewed journal. See the Urbanisation webpage last accessed on Feb. 28, 2024, at: <https://journals.sagepub.com/home/urb> and at the link on the last page of this letter with the filename: “Urbanisation webpage.pdf.”



needed.<sup>10</sup> Nationally, densities must increase on average by 19 percent.<sup>11</sup> The paper concluded this can be achieved by a “mix of small apartment buildings and modest single-family homes ....”<sup>12</sup> Incorporate these housing types and densities into the County’s urban growth areas (UGAs). This will also help make housing more affordable.

- Amend the zoning regulations to allow corner stores, cafes, day care, and other basic services in residential neighborhoods as a transportation mitigation strategy. Bringing these destinations closer to homes will shorten trips and increase the ability of residents to complete these trips by walking and bicycling. This will reduce greenhouse gas emissions and provide healthy, active transportation options.
- Invest in multimodal transportation facilities, which is already a feature of the comprehensive plan, and do not invest in transportation facilities that will increase greenhouse gas emissions.
- The Southern Resident Orca Task Force’s *Final Report and Recommendations* recommends promoting “‘live where you work’ to reduce commutes while improving public transportation infrastructure.”<sup>13</sup> This is an effective mitigating measure to reduce traffic and greenhouse gas emissions along with impacts on water quality and fish and wildlife habitats.
- The U.S. Environmental Protection Agency (EPA) found that state and local governments can significantly reduce greenhouse gas emissions through land and materials management practices such as materials efficiency, industrial ecology, green design, land revitalization, sustainable consumption, smart

<sup>10</sup> Benjamin Goldstein, Dimitrios Gounaridis, and Joshua P. Newell, *The carbon footprint of household energy use in the United States* 117 PROCEEDINGS OF THE NATIONAL ACADEMY OF SCIENCES OF THE UNITED STATES OF AMERICA (PNAS) 19122, p. 19122 (Aug. 11, 2020) last accessed on Feb. 20, 2024, at: <https://www.pnas.org/content/117/32/19122> and at the link on the last page of this letter with the filename: “goldstein-et-al-2020-the-carbon-footprint-of-household-energy-use-in-the-united-states.pdf.” PNAS is a peer-reviewed journal. PNAS Author Center last accessed on Oct. 19, 2023, at: <https://www.pnas.org/author-center> and at the link on the last page of this letter with the filename: “PNAS Author Center.pdf.”

<sup>11</sup> Benjamin Goldstein, Dimitrios Gounaridis, and Joshua P. Newell, *The carbon footprint of household energy use in the United States* 117 PROCEEDINGS OF THE NATIONAL ACADEMY OF SCIENCES OF THE UNITED STATES OF AMERICA (PNAS) 19122, p. 19128 (Aug. 11, 2020).

<sup>12</sup> *Id.*

<sup>13</sup> Southern Resident Orca Task Force, *Final Report and Recommendations* p. 107 (Nov. 2019) last accessed on Feb. 20, 2024, at: <https://www.orca.wa.gov/wp-content/uploads/TaskForceFinalReport-2019.pdf> and at the link on the last page of this letter of this letter with the filename: “TaskForceFinalReport-2019.pdf.”

growth, pollution prevention, and design for environment.<sup>14</sup> These should also be included as additional mitigation measures.

- We recommend adding as mitigating measures the strategies and actions identified as most effective to reduce vehicle use by the recent meta-analysis by Kuss and Nicholas.<sup>15</sup>

### **Incorporate additional upzones within the existing urban growth areas to eliminate the need for UGA expansions.**

The Southern Resident Orca Task Force's *Final Report and Recommendations* calls for Washington to "increase affordable housing and reduce urban sprawl by growing 'up instead of out.'"<sup>16</sup> We recommend that the comprehensive plan not expand urban growth areas and instead grow up.

The Kitsap County Buildable Lands Report identified a gap between the need for 9,700 housing units at medium high and high housing densities to provide housing affordable to individuals and families with incomes of less than 80 percent of the adjusted median income and the existing capacity of less than 4,500 units or, if housing is built to its maximum capacity, up to about 6,000 housing units.<sup>17</sup> To adequately serve those individuals and families the land zoned for medium high and high density housing units will have to be significantly above 9,700 housing

<sup>14</sup> US Environmental Protection Agency, Office of Solid Waste and Emergency Response, *Opportunities to Reduce Greenhouse Gas Emissions through Materials and Land Management Practices* pp. 19 – 28 (Sept. 2009) last accessed on Feb. 20, 2024, at:

<https://www.epa.gov/sites/production/files/documents/ghg-land-materials-management.pdf> and at the link on the last page of this letter with the filename: "ghg-land-materials-management.pdf."

<sup>15</sup> Paula Kuss and Kimberly A Nicholas, *A dozen effective interventions to reduce car use in European cities: Lessons learned from a meta-analysis and transition management* 10 CASE STUDIES ON TRANSPORT POLICY pp. 1494-1513 (Issue 3, Sept. 2022) last accessed on Feb. 19, 2024, at <https://www.sciencedirect.com/science/article/pii/S2213624X22000281> and at the link on the last page of this letter with the filename: "1-s2.0-S2213624X22000281-main.pdf." Case Studies On Transport Policy is a peer reviewed journal. Case Studies On Transport Policy Guide for Authors pp. \*13 – 14 last accessed on Feb. 20, 2024, at: <https://www.sciencedirect.com/journal/case-studies-on-transport-policy/publish/guide-for-authors> <https://www.sciencedirect.com/science/article/pii/S2213624X22000281> and at the link on the last page of this letter with the filename: "CASE STUDIES ON TRANSPORT POLICY Guide for Authors.pdf."

<sup>16</sup> Southern Resident Orca Task Force, *Final Report and Recommendations* p. 107 (Nov. 2019).

<sup>17</sup> *Buildable Lands Report Kitsap County, Washington Draft* (Aug. 2021) Appendix E: Draft Housing Availability and Affordability Memo p. 8 last accessed on April 3, 2024, at: [https://www.kitsap.gov/dcd/PEP%20Documents/FINAL%20Buildable%20Lands%20Report\\_November%202021.pdf](https://www.kitsap.gov/dcd/PEP%20Documents/FINAL%20Buildable%20Lands%20Report_November%202021.pdf) and at the link on the last page of this letter with the filename: "FINAL Buildable Lands Report\_November 2021.pdf."

units since housing at those densities is attractive to higher income individuals and families. These upzones should be in existing cities and urban growth areas.

**The comprehensive plan should have stable urban growth areas consistent with VISION 2050. See the Future Land Use Map.**

Comprehensive Plan Alternatives 2 and 3 propose urban growth area expansions.<sup>18</sup> “VISION 2050 calls for a stable and sustainable urban growth area into the future, thus any adjustments to the urban growth area [UGA] in the coming decades should continue to be minor. When adjustments to the urban growth area are considered, it will be important to avoid encroaching on important habitat and natural resource areas.”<sup>19</sup> MPP-RGS-5 provides “[e]nsure long-term stability and sustainability of the urban growth area consistent with the regional vision.”<sup>20</sup> MPP-RGS-6 also provides: “Encourage efficient use of urban land by optimizing the development potential of existing urban lands and increasing density in the urban growth area in locations consistent with the Regional Growth Strategy.”<sup>21</sup> Comprehensive plans must be consistent multicounty planning policies.<sup>22</sup> Consistent with VISION 2050, we recommend that the adopted comprehensive plan not include urban growth area expansions.

The GMA requires urban growth areas and limits their size for many reasons. One of the most important is that compact urban growth areas (UGAs) save taxpayers and ratepayers money. In a study published in a peer reviewed journal, Carruthers and Ulfarsson analyzed urban areas throughout the United States including Kitsap County.<sup>23</sup> They found that the per capita costs of most

<sup>18</sup> *Kitsap Comprehensive Plan Update Planning Commission Recommendation Preferred Alternative* pp. 2 – 6 (March 26, 2024).

<sup>19</sup> Puget Sound Regional Council, *VISION 2050: A Plan for the Central Puget Sound Region* p. 43 (Oct. 2020).

<sup>20</sup> *Id.*

<sup>21</sup> *Id.*

<sup>22</sup> *West Seattle Defense Fund v. City of Seattle*, CPSGMHB Case No. 94-3-0016, Final Decision and Order (April 4, 1995), at \*55; *Friends of Pierce County, et al., City of Bonney Lake, and Marilyn Sanders, et al. v. Pierce County, and Orton Farms et al., City of Sumner, Bethell School District, Puyallup School District, and Forterra NW*, CPSRMHB Case No. 12-3-0002c, Final Decision and Order (July 9, 2012), at 11 of 138.

<sup>23</sup> John Carruthers and Gudmaundur Ulfarsson, *Urban Sprawl and the Cost of Public Services* 30 ENVIRONMENT AND PLANNING B: PLANNING AND DESIGN 503, 511 (2003) last accessed on Feb. 20, 2024, at: [https://www.ezview.wa.gov/Portals/\\_1995/Documents/Documents/Exhibit%20%23J1%20-%20Futurewise\\_UrbanSprawl.pdf](https://www.ezview.wa.gov/Portals/_1995/Documents/Documents/Exhibit%20%23J1%20-%20Futurewise_UrbanSprawl.pdf) and at the link on the last page of this letter with the filename: “Urban sprawl and the cost of public services.pdf.” Environment and Planning B is a peer reviewed journal. See the Environment and Planning B webpage last accessed on Feb. 20, 2024,



public services declined with density and increased where urban areas were large.<sup>24</sup> Compact urban growth areas save taxpayers and ratepayers money. Compact urban growth areas will also help achieve the GMA requirements to plan for public facilities and transportation facilities because compact urban growth areas require less costly public facilities.<sup>25</sup>

We do appreciate that the Planning Commission recommendation did remove some urban growth area (UGA) expansions including the southwest Urban Low (single-family) expansion east of Arborwood that was proposed to be added to the Kingston UGA, the northern Urban Low (single-family) expansions on the northern boundary of the Silverdale UGA, and the Urban Low (UL) expansion at the northwest corner of the Port Orchard/South Kitsap UGA.<sup>26</sup> Removing these areas will help reduce greenhouse gas emissions, reduce adverse impacts on salmon, and reduce costs for taxpayers and ratepayers. We support not including these expansions in the UGAs.

### **Futurewise supports the Planning Commission's recommended Tree Canopy Requirements.**

Futurewise supports the Planning Commission's recommended Tree Canopy requirements.<sup>27</sup> A recent peer reviewed study of 93 European cities estimated that increasing the tree coverage to 30 percent would cool cities by a mean of 0.4°C and prevent 2,644 premature deaths.<sup>28</sup> A U.S. Forest Service team "found that 403 premature adult deaths – 3% of the city's total mortality – might be prevented each year if the city [of Philadelphia] increased tree canopy cover to 30% by 2025."<sup>29</sup> Urban trees have other benefits including energy savings, reduced air

<https://journals.sagepub.com/home/epb> and at the link on the last page of this letter with the filename: "Environ & Planning B webpage.pdf."

<sup>24</sup> John Carruthers and Gudmaundur Ulfarsson, *Urban Sprawl and the Cost of Public Services* 30 ENVIRONMENT AND PLANNING B: PLANNING AND DESIGN 503, 518 (2003).

<sup>25</sup> RCW 36.70A.020(10), (12); RCW 36.70A.060(2); RCW 36.70A.070(3), (6).

<sup>26</sup> *Kitsap Comprehensive Plan Update Planning Commission Recommendation Preferred Alternative* pp. 2 – 3, p. 7 (March 26, 2024).

<sup>27</sup> *Id.* p. 8.

<sup>28</sup> Tamara Iungman, MPH Marta Cirach, MSc Federica Marando, PhD Evelise Pereira Barboza, MPH Sasha Khomenko, MSc Pierre Masselot, PhD, *et al.*, *Cooling cities through urban green infrastructure: a health impact assessment of European cities* 401 THE LANCET 577, 577 (Published: Jan. 31, 2023 DOI: [https://doi.org/10.1016/S0140-6736\(22\)02585-5](https://doi.org/10.1016/S0140-6736(22)02585-5) last accessed on April 3, 2024).

<sup>29</sup> Connie Ho, *Can trees save lives? Forest Service research suggests they can* (USDA Natural Resources and Environment webpage: April 29, 2022), last accessed on April 3, 2024, at: <https://www.fs.usda.gov/features/can-trees-save-lives> and at the link on the last page of this letter with the filename: "Can trees save lives\_ \_ US Forest Service.pdf."

pollution, reduced stormwater runoff, and wildlife habitat.<sup>30</sup> Urban trees are cost-effective. A study of five cities found that they “spent \$13– 65 annually per tree, but benefits returned for every dollar invested in management ranged from \$1.37 to \$3.09.”<sup>31</sup> The study cautions that costs are highly variable and so cannot be generalized to other jurisdictions.<sup>32</sup> But they do show that urban trees produce more benefits than costs. For these reasons, we strongly support the Planning Commission’s recommend Urban Tree Canopy policies.

**The comprehensive plan needs to reduce rural growth rates over time and to achieve the Regional Growth Strategy adopted rural population growth target of eight percent of the county’s total population growth consistent with Multicounty Planning Policy MPP-RGS-14 and the Regional Growth Strategy. See the Future Land Use Map, Table 1.7 Kitsap County’s Rural Land Use Designations on p. 48, LAMIRDs on pp. 49 – 51, and Rural Land Use Goals, Policies, and Strategies pp. 51 – 52 of the draft comprehensive plan.**

The Growth Management Act requires counties to comply with the Puget Sound Regional Council Multicounty Planning Policies.<sup>33</sup> Multicounty Planning Policy MPP-RGS-14 directs Kitsap County, and all of the Central Puget Sound counties, to “[m]anage and reduce rural growth rates over time, consistent with the Regional Growth Strategy, to maintain rural landscapes and lifestyles and protect resource lands and the environment.”<sup>34</sup> The Regional Growth Strategy adopted rural population growth target of eight percent of the county’s total population growth or 8,000 people for Kitsap County.<sup>35</sup> On a percentage basis, this is the highest rural growth population growth target of the four Central Puget County counties.<sup>36</sup>

<sup>30</sup> Greg McPherson, James R. Simpson, Paula J. Peper, Scott E. Maco, and Qingfu Xiao, *Municipal Forest Benefits and Costs in Five US Cities* 103 JOURNAL OF FORESTRY 411, 412 (Dec. 2005) last accessed on April 3, 2024, at: [https://www.fs.usda.gov/psw/publications/mcpherson/psw\\_2005\\_mcpherson003.pdf](https://www.fs.usda.gov/psw/publications/mcpherson/psw_2005_mcpherson003.pdf) and at the link on the last page of this letter with the filename: “psw\_2005\_mcpherson003.pdf.” The Journal of Forestry is peer reviewed. Journal of Forestry Guide for Authors webpage last accessed on March 30, 2023, at: [https://academic.oup.com/jof/pages/General\\_Instructions?login=false](https://academic.oup.com/jof/pages/General_Instructions?login=false) and in the Dropbox link on page 7 of this letter with the filename: “General Instructions \_ Journal of Forestry \_ Oxford Academic.pdf.”

<sup>31</sup> Greg McPherson, James R. Simpson, Paula J. Peper, Scott E. Maco, and Qingfu Xiao, *Municipal Forest Benefits and Costs in Five US Cities* 103 JOURNAL OF FORESTRY 411, 415 (Dec. 2005).

<sup>32</sup> *Id.* p. 416.

<sup>33</sup> *Stickney v. Cent. Puget Sound Growth Mgmt. Hearings Bd.*, 11 Wn. App. 2d 228, 244 – 45, 453 P.3d 25, 34 (2019).

<sup>34</sup> Puget Sound Regional Council, *Vision 2050: A Plan for the Central Puget Sound Region* p. 43 (Oct. 2020).

<sup>35</sup> *Id.* at p. 30.

<sup>36</sup> *Id.*

Kitsap County's Buildable Lands Report documents that in 2013 through 2019, 29 percent of the county's population growth occurred in the rural area.<sup>37</sup> While this was an improvement over the past years, it shows that Kitsap County faces significant challenges in crafting a comprehensive plan and development regulations that comply with the Regional Growth Strategy.<sup>38</sup>

None of the Rural Land Use Designations and Rural Land Use Goals, Policies, and Strategies call for reducing rural growth rates over time as MPP-RGS-14 requires.<sup>39</sup> Nor does the Planning Commission's recommendation.<sup>40</sup> One of the Planning Commission recommendations, changing detached accessory dwelling units from conditional uses to permitted uses in the Suquamish and Manchester limited areas of more intense rural development (LAMIRDs), will increase rural growth.<sup>41</sup> We do appreciate that the Planning Commission recommended against deleting the lot aggregation requirements in the Suquamish and Manchester LAMIRDs which would also have increased rural growth.<sup>42</sup>

The Future Land Use Map, the Rural Land Use Designations, the rural land use goals, policies, and strategies, and rural zones and development regulations need to reduce rural growth rates over time as MPP-RGS-14 requires. The comprehensive plan must be improved to comply with MPP-RGS-14 and the Regional Growth Strategy.

The Regional Growth Strategy limits rural growth to retain important cultural, economic, and rural lifestyle opportunities; to protect the environment including reducing greenhouse gas pollution; and to reduce the costs of transportation facilities.<sup>43</sup> So there are important policies behind the numbers.

**The comprehensive plan should not include rural comprehensive plan amendments or upzones that increase rural population and employment capacity. See the Future Land Use Map.**

<sup>37</sup> *Buildable Lands Report Kitsap County, Washington Final* p. 18 (Nov. 2021).

<sup>38</sup> *Id.* p. 19.

<sup>39</sup> Draft Kitsap County Comprehensive Plan 2024 pp. 51 – 52.

<sup>40</sup> *Kitsap Comprehensive Plan Update Planning Commission Recommendation Preferred Alternative* p. 7 (March 26, 2024).

<sup>41</sup> *Id.*

<sup>42</sup> *Id.*

<sup>43</sup> Puget Sound Regional Council, *Vision 2050: A Plan for the Central Puget Sound Region* p. 23 – 24, p. 37, p. 43 (Oct. 2020).



As discussed above, the Growth Management Act requires counties to comply with the Puget Sound Regional Council Multicounty Planning Policies.<sup>44</sup> Multicounty Planning Policy MPP-RGS-14 directs Kitsap County, and all of the Central Puget Sound counties, to “[m]anage and reduce rural growth rates over time, consistent with the Regional Growth Strategy, to maintain rural landscapes and lifestyles and protect resource lands and the environment.”<sup>45</sup> The Regional Growth Strategy adopted rural population growth target of eight percent of the county’s total population growth or 8,000 people for Kitsap County.<sup>46</sup> On a percentage basis, this is the highest rural growth population growth target of the four Central Puget Sound counties.<sup>47</sup> Kitsap County’s Buildable Lands Report documents that in 2013 through 2019, 29 percent of the county’s population growth occurred in the rural area.<sup>48</sup> While this was an improvement over the past years, it shows that Kitsap County faces significant challenges in crafting a comprehensive plan and development regulations that comply with the Regional Growth Strategy.<sup>49</sup>

The County’s own data makes clear that the one thing Kitsap County should not do is increase rural development capacity. Alternative 3 increases the acreage of the Rural Residential (1 DU/5 Ac) zone and decreases the acreage in the Rural Protection (1 DU/10 Ac) and Rural Wooded (1 DU/20 Ac) zones.<sup>50</sup> This is an example of amendments that violate MPP-RGS-14 because they will increase rural capacity.

The Olympic Property Group/Raydient proposal to rezone land from one dwelling unit per 20-acre zoning to one dwelling unit per five acres is the opposite of what the Regional Growth Strategy requires because it will increase rural population capacity and rural growth rates. This rezone is inconsistent with VISION 2050. Other comprehensive plan amendments and zoning amendments that increase rural population capacity also appear to be inconsistent with VISION 2050.

We understand that the Planning Commission recommended that “[a]ll rural reclassification requests (including Rayonier) should be referred to a 2025+

<sup>44</sup> *Stickney v. Cent. Puget Sound Growth Mgmt. Hearings Bd.*, 11 Wn. App. 2d 228, 244 – 45, 453 P.3d 25, 34 (2019).

<sup>45</sup> Puget Sound Regional Council, *Vision 2050: A Plan for the Central Puget Sound Region* p. 43 (Oct. 2020).

<sup>46</sup> *Id.* at p. 30.

<sup>47</sup> *Id.*

<sup>48</sup> *Buildable Lands Report Kitsap County, Washington Final* p. 18 (Nov. 2021).

<sup>49</sup> *Id.* p. 19.

<sup>50</sup> 2024 Comprehensive Plan Update Draft Environmental Impact Statement Kitsap County pp. 2-22 – 2-26 (Dec. 2023).

planning process.”<sup>51</sup> But that is just going to increase costs for the County and the public to redo the planning process in the future. The better approach is to just deny them now for the reasons explained above.

**Futurewise supports Land Use Goal 7, Historic, archaeological, and cultural resources, and recommends the addition of a Land Use Strategy requiring pre-ground disturbance site investigations for sites where the state predictive model show cultural resources are likely or when requested by affected Native American Tribes and Nations and a strategy to address landscape level cultural resources. Please see page 34 of the Draft Comprehensive Plan.**

Futurewise supports Land Use Goal 7, Historic, archaeological, and cultural resources, and its associated Land Use Strategies. The Washington State Department of Archaeology and Historic Preservation has developed an archaeological predictive model that can help predict where archaeological resources are likely to be located and where the department recommends archaeological surveys should be completed before earth disturbing activities and other uses and activities that can damage archaeological sites are undertaken.<sup>52</sup> Large areas of Kitsap County are rated as “4 - Survey Highly Advised: High Risk (Color: Pale Yellow)” and “5 - Survey Highly Advised: Very High Risk (Color: Brightest Yellow/Canary Yellow).” The map also shows other areas where surveys are also advised. This documents the clear need to protect archaeological and cultural resources in Kitsap County.

Earth disturbing activities undertaken before a survey has been completed may result in significant cost increases including work stoppages and even project cancellation in addition to the destruction of important archeological and cultural resources. For example, the Jefferson County Public Utility District’s (PUD) contractor building a community septic system at Becket Point in Jefferson County encountered human bones and Native American artifacts.<sup>53</sup> The contractor had to

<sup>51</sup> *Kitsap Comprehensive Plan Update Planning Commission Recommendation Preferred Alternative* p. 2 (March 26, 2024).

<sup>52</sup> Washington State Department of Archaeology and Historic Preservation WISAARD webpage last accessed on Feb. 19, 2024, at: <https://dahp.wa.gov/historic-preservation/find-a-historic-place>. The results of the predictive model are available for Whatcom County to use in planning and project reviews from the Washington State Department of Archaeology and Historic Preservation.

<sup>53</sup> Jeff Chew, *Jefferson PUD sticks with Beckett Point* Connections p. 8 (Washington Public Utility Districts Association [WPUDA]: Winter 2008) last accessed on Feb. 19, 2024, at: <https://www.yumpu.com/en/document/view/46547248/connections-washington-public-utility-district-association/11>.

stop construction. An archaeologist was called in and an investigation that allowed the project to be redesigned and completed. However, PUD staff “estimated the delays and additional engineering incurred because of the artifacts added about \$90,000 to the project’s cost.”<sup>54</sup> At least some of that money could have been saved by an upfront archeological investigation.

To address these important issues, we recommend that the comprehensive plan include a Land Use Strategy requiring pre-ground disturbance site investigations for sites where the predictive model show cultural resources are likely or when requested by affected Native American Tribes and Nations. This land use strategy will help address the Growth Management Act historic preservation goal.<sup>55</sup>

Futurewise also recommends adding a strategy to protect landscape scale cultural resources. Historic culturally important landscapes are “large scale properties are often comprised of multiple, linked features that form a cohesive ‘landscape.’”<sup>56</sup> They are important to Native American Tribes, Nations, and peoples.<sup>57</sup> For example, tribal members probably cannot sustain a spiritual cultural practice like bathing in a creek when the culturally significant creek is surrounded by houses and clearcuts. These areas need to be identified in consultation with Indian Tribes and Nations. Looking at cultural natural resources at the landscape level would help tribes (and the rest of us) meet their expressed goals for functional habitats that we are continuing to fall short on. Tribal natural cultural resources need to be considered when defining UGAs in consultation with Indian Tribes and Nations.

### **Futurewise supports the Environment Element in the Comprehensive Plan.**

As the comprehensive plan states, Kitsap County residents and businesses benefit from a functioning environment. A functioning environment is also important to recover salmon. Kitsap County should be proud of its many positive actions to protect and restore the environment and summarized on pages 69 and 70 of the draft comprehensive plan. We strongly support the Environment Element.

<sup>54</sup> *Id.* at p. 9.

<sup>55</sup> RCW 36.70A.030(13) Historic preservation. Identify and encourage the preservation of lands, sites, and structures, that have historical or archaeological significance.

<sup>56</sup> Advisory Council on Historic Preservation, *Native American Traditional Cultural Landscapes Action Plan* p. 1 (Nov. 23, 2011) last accessed on April 5, 2024, at: <https://www.achp.gov/sites/default/files/guidance/2018-06/NativeAmericanTCLActionPlanNovember232011.pdf> and at the link on the last page of this letter with the file name: “NativeAmericanTCLActionPlanNovember232011.pdf.”

<sup>57</sup> *Id.*



**The Environment Goals, Policies and Strategies should limit impervious surfaces and forest clearing to protect salmon habitat particularly outside urban growth areas. See the Environment Goals, Policies and Strategies on pp. 72–77 and the rural comprehensive plan designations in the draft comprehensive plan.**

Researchers at the University of Washington have carefully studied the effects of development on stream basins in the Puget Sound Region. These studies have shown that when total impervious surfaces exceed five to ten percent and forest cover declines below 65 percent of the basin, then salmon habitat in streams and rivers is damaged.<sup>58</sup> Impervious surfaces are continuing to increase in Kitsap County.<sup>59</sup> We recommend policies and regulations that will keep total impervious surfaces below five to ten percent and forest cover at or above 50 percent of the basin to protect salmon habitat.<sup>60</sup>

**Futurewise strongly supports including the Climate Change Element in the Comprehensive Plan.**

Climate change is already causing adverse impacts on Kitsap County.<sup>61</sup> These adverse impacts are only going to worsen.<sup>62</sup> Kitsap County is wise to include a Climate Change Element in the Comprehensive Plan and Futurewise supports the element.

We recommend that Climate Change Policy 5.1 also protect historic culturally important landscapes from climate impacts. Historic culturally important

<sup>58</sup> Christopher W. May, Richard R. Horner, James R. Karr, Brian W. Mar, Eugene B. Welch, *The Cumulative Effects of Urbanization on Small Streams in the Puget Sound Lowland Ecoregion* p. 17 of 26 (University of Washington, Seattle Washington) last accessed on Feb. 20, 2024, at: [https://www.researchgate.net/publication/240437080\\_Effects\\_of\\_Urbanization\\_on\\_Small\\_Streams\\_in\\_the\\_Puget\\_Sound\\_Lowland\\_Ecoregion](https://www.researchgate.net/publication/240437080_Effects_of_Urbanization_on_Small_Streams_in_the_Puget_Sound_Lowland_Ecoregion) and enclosed at the link on the last page of this letter with the filename: “Effects\_of\_Urbanization\_on\_Small\_Streams\_in\_the\_Pu.pdf.”

<sup>59</sup> *2020 State of Our Watersheds State of Our Watersheds: A Report by the Treaty Tribes in Western Washington* p. 316, p. 318 last accessed on Feb. 20, 2024, at: <https://nwifc.org/publications/state-of-our-watersheds/> and at the link on the last page of this letter with the filename: “state-of-our-watersheds-sow-2020-final-web.pdf.”

<sup>60</sup> Christopher W. May, Richard R. Horner, James R. Karr, Brian W. Mar, Eugene B. Welch, *The Cumulative Effects of Urbanization on Small Streams in the Puget Sound Lowland Ecoregion* pp. 20 – 21 of 26 (University of Washington, Seattle Washington).

<sup>61</sup> Kitsap County, Bremerton, and Port Orchard, *Kitsap County Climate Change Resiliency Assessment* p. 8 (June 2020 | Final Report) last accessed on Feb. 28, 2024, at: [https://www.kitsap.gov/dcd/Pages/Climate\\_Change\\_Resiliency\\_KC.aspx](https://www.kitsap.gov/dcd/Pages/Climate_Change_Resiliency_KC.aspx).

<sup>62</sup> *Id.* p. 10.

landscapes are “large scale properties are often comprised of multiple, linked features that form a cohesive ‘landscape.’”<sup>63</sup> They are important to Native American Tribes, Nations, and peoples.<sup>64</sup> We recommend the following revision to Climate Change Policy 5.1 with our addition double underlined.

Climate Change Policy 5.1. Protect and preserve historical and archaeological sites and historic culturally important landscapes from climate impacts.

**Please adopt policies and regulations to direct growth away from the Wildland-Urban Interface (WUI) and to encourage and require Firewise Principles.**

Large areas of Kitsap County are located in the Wildland-Urban Interface (WUI).<sup>65</sup> Wildfire is a significant threat in Kitsap County and climate change is making the threat worse.<sup>66</sup> The Growth Management Act in RCW 36.70A.070(1) provides in part that:

The land use element must reduce and mitigate the risk to lives and property posed by wildfires by using land use planning tools, which

<sup>63</sup> Advisory Council on Historic Preservation, *Native American Traditional Cultural Landscapes Action Plan* p. 1 (Nov. 23, 2011).

<sup>64</sup> *Id.*

<sup>65</sup> Ashley Blazina and Kirk Davis, *The Wildland-Urban Interface: Mapping Washington State's fastest-growing environment* (Sept. 2, 2020) last accessed on Feb. 17, 2024, at: <https://storymaps.arcgis.com/stories/7016c437623a445997c072a05e26afbb>. See also the map University of Washington Climate Impacts Group's (UW CIG) Climate Mapping for a Resilient Washington (CMRW) webtool Change in High Fire Danger Days last accessed on Feb. 20, 2024, at: <https://cig-wa-climate.nkn.uidaho.edu/> and at the link on the last page of this letter with the filename: “Kitsap Cnty Change in High Fire Danger Days.png.” The State of Washington Department of “Commerce considers the CMRW webtool a source of best available science and scientifically credible projections, so this guidance makes using the webtool a required starting point for all jurisdictions that are creating or updating a climate resilience sub-element. Commerce encourages jurisdictions to use additional resources ..., as needed, to explore climate hazards and impacts on local assets and sectors. State of Washington Department of Commerce Climate Element Planning Guidance p. 17 (Dec. 2023 – Intermediate Version) last accessed on Feb. 20, 2024, at: <https://deptofcommerce.app.box.com/s/fpg3holbwn2ctqjg7jg802h54ie19jx> and at the link on the last page of this letter with the filename: “IntermediatePlanningGuidance\_FINAL.pdf.”

<sup>66</sup> H.A. Morgan, A. Bagley, L. McGill, and C.L., Raymond, *Managing Western Washington Wildfire Risk in a Changing Climate Workshop Summary* pp. 4 – 7 (Workshop summary report prepared by the Northwest Climate Adaptation Science Center and the Climate Impacts Group, University of Washington, Seattle: Dec. 3, 2018) last accessed on Feb. 20, 2024, at: <https://cig.uw.edu/publications/managing-western-washington-wildfire-risk-in-a-changing-climate/> and at the link on the last page of this letter with the filename: “Managing-Western-Washington-Wildfire-Risk-in-a-Changing-Climate.pdf.”

may include, but are not limited to, adoption of portions or all of the wildland urban interface code developed by the international code council or developing building and maintenance standards consistent with the firewise USA program or similar program designed to reduce wildfire risk, reducing wildfire risks to residential development in high risk areas and the wildland urban interface area, separating human development from wildfire prone landscapes, and protecting existing residential development and infrastructure through community wildfire preparedness and fire adaptation measures.

While we appreciate and support the several wildfire policies, RCW 36.70A.070(1) requires more. We recommend that development be directed away from the WUI. We also recommend the adoption and enforcement of the Firewise Principles which recommend “‘two ways out’ of the neighborhood for safe evacuation during a wildfire along with other important measures to protect people and property[.]”<sup>67</sup> We recommend that the following new policy be adopted as part of the Land Use Element or the Climate Change Element:

Land Use Policy XX. Direct non-resource land uses and development away from the Wildland-Urban Interface (WUI), encourage the implementation of Firewise Principles for existing developments and uses, and require implementation of Firewise Principles for new developments and uses.

Most areas within the Wildland-Urban Interface (WUI) should have natural resource or low-density rural land use designations in the comprehensive plan. These areas should also be zoned for natural resource uses or low-density rural uses.

### **Designate agricultural lands of long-term commercial significance in the Comprehensive Plan.**

In 2023, the State of Washington Department of Commerce updated its minimum guidelines for designating agricultural lands of long-term commercial significance. These changes included expanding the soil types that indicate an area has long-term commercial significance to include farmlands of statewide importance soils

<sup>67</sup> *A Guide To Firewise Principles* p. \*4 accessed on Feb. 21, 2024, at: <https://www.nfpa.org/education-and-research/wildfire/firewise-usa/firewise-toolkit> and enclosed at the link on the last page of this letter with the filename: “FirewiseToolkitFirewisePrinciples.pdf.”



in addition to prime and unique farmland soils.<sup>68</sup> Commerce made additional changes in 2023 as well.<sup>69</sup>

The 2022 Census of Agriculture documents that the acres of land in farms in Kitsap County increased from 9,391 acres in 2017 to 9,539 acres in 2022.<sup>70</sup> Total income from farm-related sources in Kitsap County increased from \$3,161,000 in 2017 to \$4,791,000 in 2022.<sup>71</sup> Average per farm income increased from \$23,944 in 2017 to \$53,831 in 2022.<sup>72</sup>

One of the purposes of periodic updates is to comply with the requirements of the Growth Management Act including the designation of natural resource lands and the application of the minimum guidelines in WAC 365-190-050.<sup>73</sup> Given the changes in the minimum guidelines and the economic benefit of local agriculture, Kitsap County should designate agricultural lands of long-term commercial significance in the comprehensive plan consistent with the updated minimum guidelines.

**The Growth Management Act requires water quantity policies and regulations as part of the 2024 comprehensive plan and development regulations update.**

RCW 36.70A.070(1) provides that “[t]he land use element shall provide for protection of the quality and quantity of groundwater used for public water supplies.” RCW 36.70A.070(5)(c)(iv) provides that “[t]he rural element shall include measures that apply to rural development and protect the rural character of the area, as established by the county, by: ... Protecting surface water and groundwater resources.” The GMA in RCW 36.70A.590 also provides that:

<sup>68</sup> WAC 365-190-050(3)(c)(i) (2023).

<sup>69</sup> WAC 365-190-050 (2023).

<sup>70</sup> United States Department of Agriculture National Agricultural Statistics Service, *2022 Census of Agriculture Washington State and County Data Volume 1 • Geographic Area Series • Part 47 AC-22-A-47 Chapter 2. County Data Table 8. Farms, Land in Farms, Value of Land and Buildings, and Land Use: 2022 and 2017* p. 286 (Issued Feb. 2024) last accessed on Feb 20, 2024, at: [https://www.nass.usda.gov/Publications/AgCensus/2022/Full\\_Report/Volume\\_1\\_Chapter\\_2\\_County\\_Level/Washington/](https://www.nass.usda.gov/Publications/AgCensus/2022/Full_Report/Volume_1_Chapter_2_County_Level/Washington/) and at the link on the last page of this letter with the filename: “wav1.pdf.”

<sup>71</sup> United States Department of Agriculture National Agricultural Statistics Service, *2022 Census of Agriculture Washington State and County Data Volume 1 • Geographic Area Series • Part 47 AC-22-A-47 Chapter 2. County Data Table 6. Income From Farm-Related Sources: 2022 and 2017* p. 274 (Issued Feb. 2024).

<sup>72</sup> *Id.*

<sup>73</sup> RCW 36.70A.130(1)(a); *Concerned Friends of Ferry Cnty. v. Ferry Cnty.*, 191 Wn. App. 803, 834, 365 P.3d 207, 222 (2015).

For the purposes of complying with the requirements of this chapter [the GMA] relating to surface and groundwater resources, a county or city may rely on or refer to applicable minimum instream flow rules adopted by the department of ecology under chapters 90.22 and 90.54 RCW. Development regulations must ensure that proposed water uses are consistent with RCW 90.44.050 and with applicable rules adopted pursuant to chapters 90.22 and 90.54 RCW when making decisions under RCW 19.27.097 and 58.17.110.

These policies development regulations are required because overuse of surface or ground water often harms senior water rights holders and fish and wildlife habitat and consequently tribal treaty rights. “Eighty percent (80%) of the Kitsap County population uses groundwater that is pumped from wells.”<sup>74</sup> “As the population grows, so does the demand for groundwater. The quantity of usable groundwater is limited.”<sup>75</sup> As water use increases, water levels decline, groundwater discharges to streams decrease, and seawater intrudes into groundwater.<sup>76</sup> “Coho salmon, steelhead and cutthroat trout are the most vulnerable to low stream flows (and warm waters) because they rear in freshwater in the summer when low flow/high temperature conditions can constrain habitat and stress fish in some streams.”<sup>77</sup>

The reduced availability of surface water can have a negative impact on all stages of the salmonid life cycle. Water quality (e.g. temperature, flows) is affected by decreased inputs from groundwater. Lessened groundwater input concentrates pollutants, increases temperature, and diminish[es] dissolved oxygen. This is detrimental to salmonid migration, spawning and rearing.<sup>78</sup>

The *East Kitsap Demographically Independent Population (DIP) Steelhead Recovery Plan* “identifies various strategies to address water withdrawals and low streamflows for steelhead and their habitat” including “[e]nforce and improve land-use regulations that protect hydrology, including aquifer recharge areas ....”<sup>79</sup>

<sup>74</sup> 2020 *State of Our Watersheds State of Our Watersheds: A Report by the Treaty Tribes in Western Washington* p. 321 last accessed on April 3, 2024, at: <https://nwifc.org/publications/state-of-our-watersheds/> and at the link on the last page of this letter with the filename: “state-of-our-watersheds-sow-2020-final-web.pdf.”

<sup>75</sup> *Id.*

<sup>76</sup> *Id.*

<sup>77</sup> *Id.*

<sup>78</sup> *Id.* p. 40.

<sup>79</sup> *Id.* pp. 321 – 22.

To help carry out the *East Kitsap Demographically Independent Population (DIP) Steelhead Recovery Plan* and to comply RCW 36.70A.590, the comprehensive plan and development regulations should adopt policies and regulations to ensure development complies with the water codes, the applicable instream flow rules, and the watershed plan updated under RCW 90.94.020.

RCW 36.70A.590 requires the development regulations to ensure that proposed water uses are consistent with RCW 90.44.050. When the County determines if a development, land division, or use qualifies for a residential permit exempt well under RCW 90.44.050, the development regulations must require that the County limit the water used by the proposal and the parent parcel that existed in 2002, any lots created from the parent parcel, and any development built on or after 2002 on those lots to the no more than the 5,000 gallons a day allowed by RCW 90.44.050. Under the State Supreme Court's *Campbell and Gwinn* decision, each lot is entitled to one 5,000 gallon per day permit exempt withdrawal for single or group domestic uses under RCW 90.44.050.<sup>80</sup> A "developer may not claim multiple exemptions for the homeowners."<sup>81</sup> So each lot that existed in 2002, the year the *Campbell and Gwinn* decision was decided, is entitled to one permit-exempt withdrawal under RCW 90.44.050.

As lots are subdivided or developed over time, part or all of the permit exempt withdrawals are used by the lots created or the development authorized. To qualify for a permit-exempt groundwater withdrawal authorized under RCW 90.44.050, the lot must have some remaining water from the parent parcel's single 5,000 gallon per day permit exempt withdrawal for single or group domestic uses.

Therefore, the required regulations can only authorize the use of a permit exempt-well for single or group domestic uses if the water use allowed under the permit-exemption does not exceed the 5,000 gallons a day allowed by RCW 90.44.050 including the parent parcel that existed in 2002, any lots created from the parent parcel, and any development built on or after 2002. To comply with RCW 36.70A.590, the proposed development regulations must include this important limitation.

**Do not require parking for residential and mixed-use developments near transit stops with good existing or planned transit service.**

<sup>80</sup> *State Dep't of Ecology v. Campbell & Gwinn, L.L.C.*, 146 Wn.2d 1, 14, 43 P.3d 4, 110 (2002).

<sup>81</sup> *Id.*



We appreciate and support that the Planning Commission recommends reducing parking requirements for multi-family housing.<sup>82</sup> We also appreciate that the Planning Commission is recommending that one parking space in a garage associated with an individual dwelling unit counts as one of the 2.5 required parking spaces for single-family dwellings.<sup>83</sup> We support these recommended changes to the parking regulations as they will help reduce housing costs.

Futurewise also recommends eliminating parking minimums for multifamily, mixed-use housing, and affordable housing with good transit service. Multi-family and mixed-use developments in these areas can help reduce single-occupancy vehicle traffic and increase transit use by being planned and developed as transit-oriented developments.<sup>84</sup>

Households living in transit-oriented developments are twice as likely to not own a car, and own roughly half as many cars as comparable households not living in transit-oriented developments.<sup>85</sup> Eliminating parking minimums does not eliminate parking, instead allows developers to provide the parking the market demands.<sup>86</sup>

Reducing or eliminating parking also makes housing more affordable.<sup>87</sup> A study using American Housing Survey data found that “[m]inimum parking requirements in municipal zoning codes drive up the price of housing ....”<sup>88</sup> The study authors wrote:

<sup>82</sup> *Kitsap Comprehensive Plan Update Planning Commission Recommendation Preferred Alternative* p. 8 (March 26, 2024).

<sup>83</sup> *Id.*

<sup>84</sup> Futurewise | GGLO | Transportation Choices Coalition, *Transit-oriented communities: A Blueprint for Washington State* pp. 27 – 29 (Oct. 2009) last accessed on April 3, 2024, at:

<http://www.reconnectingamerica.org/assets/Uploads/tccblueprintfortoc2009.pdf> and at the link on the last page of this letter with the filename: “tccblueprintfortoc2009.pdf.”

<sup>85</sup> National Academies of Sciences, Engineering, and Medicine, *Effects of TOD on Housing, Parking, and Travel* p. 6 (Washington, DC: The National Academies Press: 2008) last accessed on Feb. 27, 2024, at <https://doi.org/10.17226/14179> and on the last page of this letter with the filename: “14179.pdf.”

<sup>86</sup> *Id.*

<sup>87</sup> *Id.*

<sup>88</sup> C. J. Gabbe & Gregory Pierce, *Hidden Costs and Deadweight Losses: Bundled Parking and Residential Rents in the Metropolitan United States* 27 HOUSING POLICY DEBATE 217, 217 (2017) (page 2 in the enclosed version) last accessed on Feb. 27, 2024, at: <https://scholarcommons.scu.edu/cgi/viewcontent.cgi?article=1040&context=ess> and on the last page of this letter with the filename: “Hidden costs and deadweight losses\_ Bundled parking andresidentialia.pdf.” Housing Policy Debate is peer reviewed. Housing Policy Debate Aims and scope

We find that the cost of garage parking to renter households is approximately \$1,700 per year, or an additional 17% of a housing unit's rent. In addition to the magnitude of this transport cost burden being effectively hidden in housing prices, the lack of rental housing without bundled parking imposes a steep cost on carless renters—commonly the lowest income households—who may be paying for parking that they do not need or want. We estimate the direct deadweight loss for carless renters to be \$440 million annually. We conclude by suggesting cities reduce or eliminate minimum parking requirements, and allow and encourage landlords to unbundle parking costs from housing costs.<sup>89</sup>

Parking reforms work. A peer reviewed study of Seattle's parking reforms showed “that (1) minimum parking requirements constrain developers, though not uniformly; and (2) reducing requirements leads to less parking provision, and presumably cost savings for developers and lower housing prices for consumers. These findings highlight the impact that policymakers can have by reducing or eliminating off-street parking requirements.”<sup>90</sup> “Seattle developers built 40% less parking than would have been required prior to the reforms, resulting in 18,000 fewer parking spaces and saving an estimated \$537 million.”<sup>91</sup>

The Regional Plan Association looked at trends in the construction of affordable housing in New York City after the city waived parking requirements in certain areas. Since the requirements were waived, the annual number of affordable units built has “shot up.”<sup>92</sup> “[W]aiving parking requirements for new buildings has yielded more new affordable homes, especially on smaller parcels of land.”<sup>93</sup>

webpage last accessed on Feb. 27, 2024, at:

<https://www.tandfonline.com/action/journalInformation?show=aimsScope&journalCode=rhpd20>.

<sup>89</sup> *Id.*

<sup>90</sup> C.J. Gabbe, Gregory Pierce, Gordon Clowers, *Parking policy: The effects of residential minimum parking requirements in Seattle* 91 LAND USE POLICY 104053, 104053 (Feb. 2020) last accessed on Feb. 27, 2024, at: <https://www.sciencedirect.com/science/article/abs/pii/S0264837718312870>. Land Use Policy is peer reviewed. *Id.*

<sup>91</sup> *Id.*

<sup>92</sup> Regional Plan Association, *Parking Policy Is Housing Policy: How Reducing Parking Requirements Stimulates Affordable Housing Production* p. \*1 (Dec. 2022) last accessed on Feb. 27, 2024, at: <https://rpa.org/work/reports/parking-policy-is-housing-policy#zqa-unlocked-potential-for-more-as-of-right-smaller-affordable-developments>.

<sup>93</sup> *Id.* at p. 2.

In addition to saving money, “parking reform can lower tax rates, revive business districts, decrease property vacancies, and allow development of fewer off-street parking spaces as property becomes available for other uses (Hess, 2017).”<sup>94</sup> For all of these reasons, we recommend that residential development, mixed-use, and affordable housing with good existing or planned transit service not be required to provide parking for motor vehicles.

**Please include information in the housing element or a background report identifying sufficient capacity of land for permanent supportive housing and affordable housing.**

RCW 36.70A.070(2)(c) requires the Kitsap County housing element, and the housing elements of the cities, to identify “sufficient capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, [and] permanent supportive housing ....” Using the State of Washington Department of Commerce Housing for All Planning Tool (HAPT) methodology, the population targets are converted to needed housing units by income category and beds for permanent supportive housing. The County must then identify the land with the zoning capacities needed to accommodate these housing units by income band or category.

The State of Washington Department of Commerce has documented that low- and mid-rise wood frame housing types are needed to provide housing affordable to families and individuals with incomes between 0 to 80 percent of the adjusted median income when subsidies are available.<sup>95</sup> These housing types also provide housing affordable to families and individuals earning between 80 to 120 percent of the adjusted median income without subsidies.<sup>96</sup> With subsidies, high-rise

<sup>94</sup> Daniel Baldwin Hess Jeffrey Rehler, *Minus Minimums: Development Response to the Removal of Minimum Parking Requirements in Buffalo (NY)* 87 JOURNAL OF THE AMERICAN PLANNING ASSOCIATION 396, 397 (2021) last accessed on Feb. 27, 2024, at: <https://www.tandfonline.com/doi/pdf/10.1080/01944363.2020.1864225?needAccess=true&> and at the link on the last page of this letter with the filename: “Minus Minimums.pdf.” The Journal of the American Planning Association is peer reviewed.

<sup>95</sup> Washington States Department of Commerce, Local Government Division Growth Management Services, *Guidance for Updating Your Housing Element: Updating your housing element to address new requirements* p. 33 (Aug. 2023) last accessed on Jan. 17, 2024, at: <https://deptofcommerce.app.box.com/s/1d9d517g509r389fomjpowh8isjpirlh> and at the link on the last page of this letter with the filename: “HB 1220\_Book2\_Housing Element Update\_230823 Final\_updated 231031.pdf.”

<sup>96</sup> *Id.*

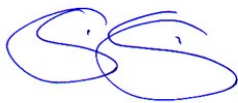


buildings are also affordable to families and individuals earning between 80 to 120 percent of the of the adjusted median income.<sup>97</sup> Accessory dwelling units on existing lots can also provide housing for families and individuals earning 80 to 120 percent of the adjusted medium income in higher cost communities.<sup>98</sup>

In identifying “sufficient capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, [and] permanent supportive housing ...,” the County must take into account its comprehensive plan and development regulations. The analysis must also take into account that low- and mid-rise wood frame housing types are needed to provide both subsidized affordable housing and to meet the market demand for these housing types and their rents.<sup>99</sup> Note that RCW 36.70A.070(2)(c) requires “sufficient capacity of land” for both affordable and market rate housing including market rate multifamily housing. If the inventory and analysis shows that sufficient capacity is not available, the comprehensive plan and development regulations will have to be amended as RCW 36.70A.040(3)(d) requires “development regulations that are consistent with and implement the comprehensive plan....” Development regulations must also comply with the GMA including RCW 36.70A.070(2)(c).<sup>100</sup> It may be that the county has already completed this work, if so please let us know.

Thank you for considering our comments. If you require additional information, please contact me at telephone (206) 343-0681 or email: [tim@futurewise.org](mailto:tim@futurewise.org).

Very Truly Yours,



Tim Trohimovich  
Director of Planning and Law

Enclosures at this link:

<sup>97</sup> *Id.*

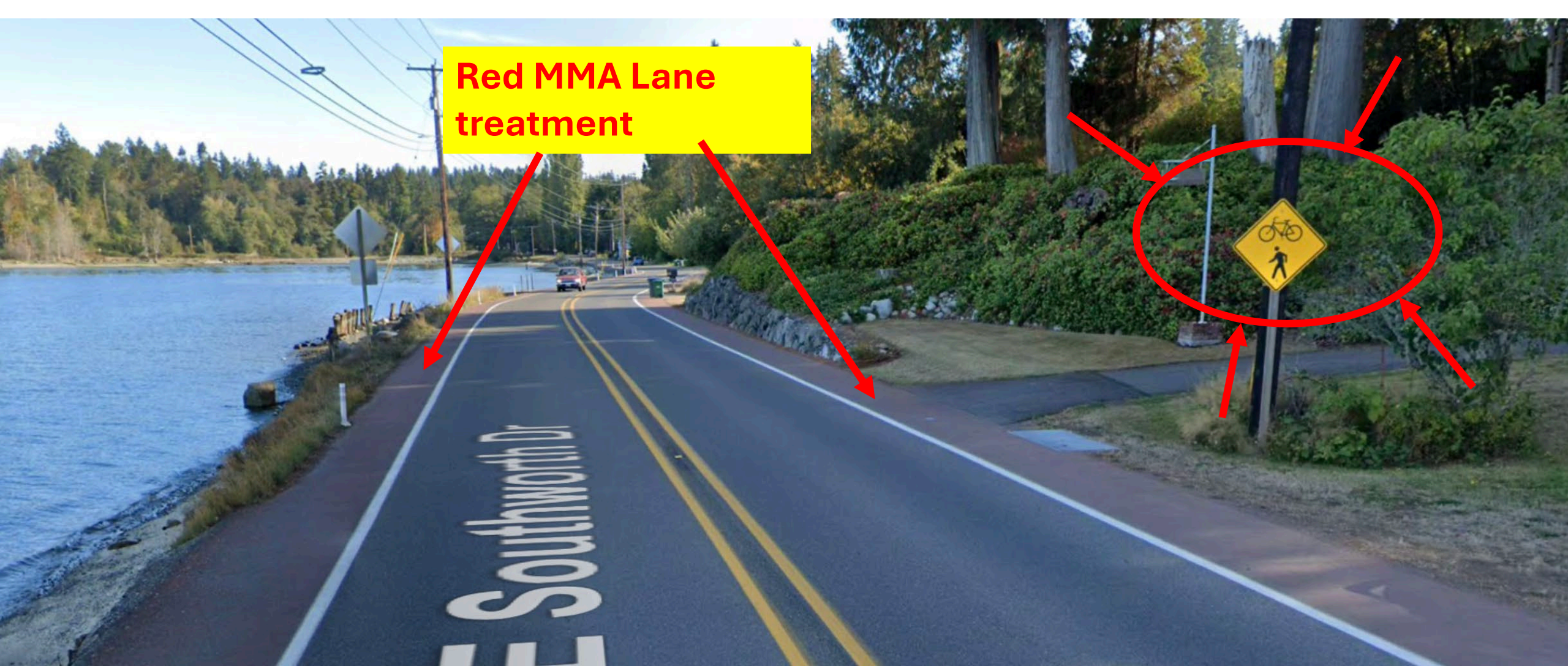
<sup>98</sup> *Id.*

<sup>99</sup> *Id.*

<sup>100</sup> *Kittitas Cty. v. Eastern Washington Growth Management Hearings Bd.*, 172 Wn.2d 144, 164, 256 P.3d 1193, 1203 (2011) citing RCW 36.70A.130(1) accord RCW 36.70A.290(2).

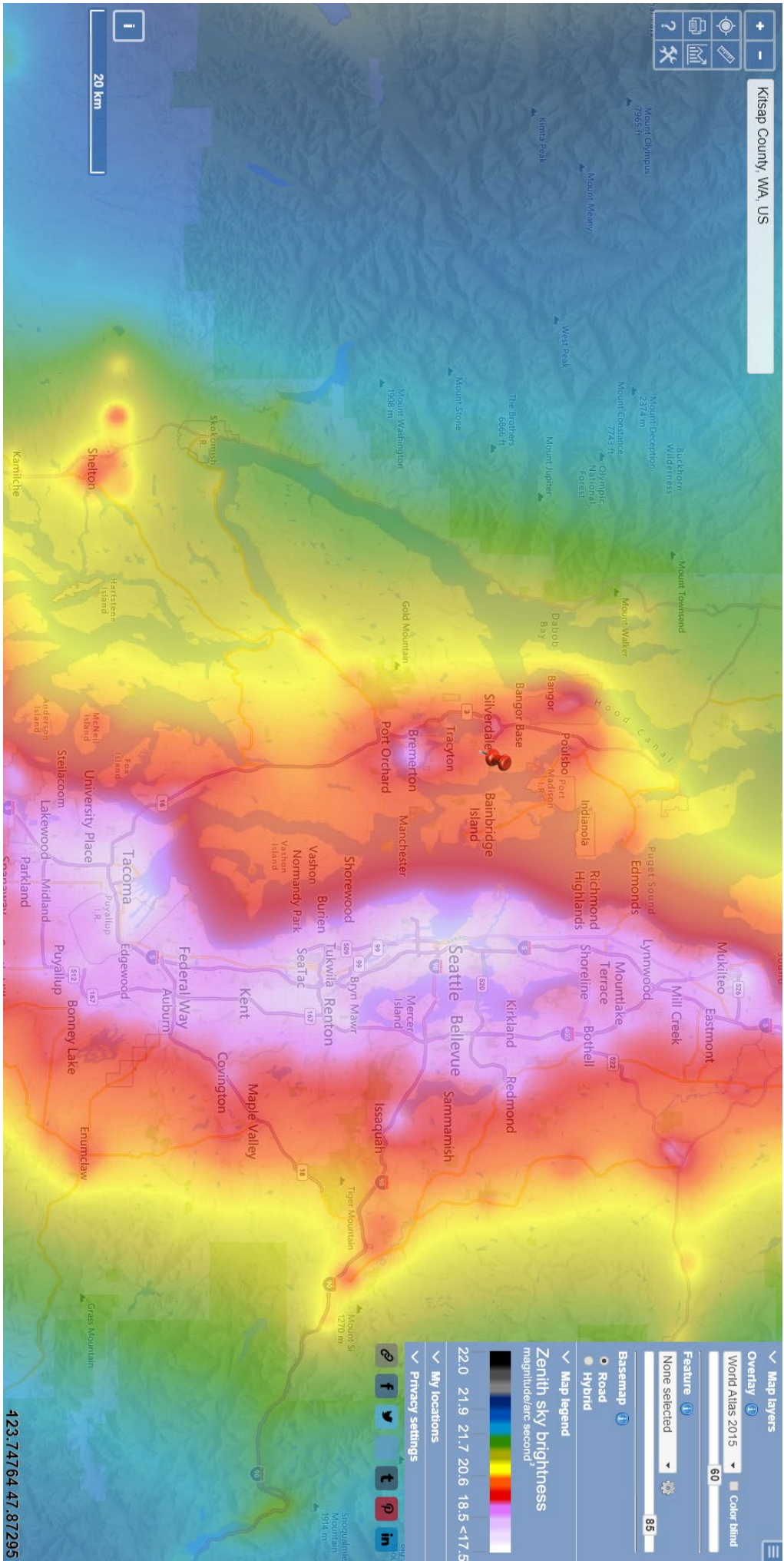
[https://futurewiseorg.sharepoint.com/:f:/g/Esm6h\\_SA4lRNmI9V73SKKsEB5-1sFxocA2MbUg2fhAqLUw?e=OQYXPO](https://futurewiseorg.sharepoint.com/:f:/g/Esm6h_SA4lRNmI9V73SKKsEB5-1sFxocA2MbUg2fhAqLUw?e=OQYXPO)

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“Flexible Space” Bike/Ped design  
Example is from Southworth Drive, S. Kitsap





## **Ten Principles for the Preferred Land Use Decision**

On March 26, the Kitsap County Planning Commission released its recommendation for the preferred land use alternative for the County's 2024 Comprehensive Plan. We of the **Kitsap Environmental Coalition** (KEC) Steering Committee support the direction of the recommendation and we look forward to continuing to work with the County toward the completion of this Plan that will define the future of Kitsap. That work should be guided, we believe, by the following principles:

### **1) Prioritize climate and environmental conditions in planning for the next 20 years.**

It is important to recognize that human action should include caring for people and the planet. Maintaining the health of Earth, on which our existence depends, must take precedence, and we should treat nature as the foundation of life itself, not simply as an asset for humans to use. Give high priority to the protection and regeneration of our ecosystems for the well-being of current and future generations of all Kitsap inhabitants, including wildlife.

Environmental conditions are changing more rapidly and unpredictably than in the past, and we need to give more explicit attention to climate change and its impact on the County's development. This includes reducing our county's contributions to climate change and prioritizing resiliency.

One way to signal this priority is by putting the climate and environment chapters of the Comp Plan first. Another is to lead by example, visibly implementing smart energy in county facilities and vehicles. Likewise, building public awareness and engagement through educational programs and incentives is essential.

### **2) Emphasize Land Use Alternative 2, which centers on concentrating housing in the core of the UGAs and focuses on the missing middle housing.**

In stating support for Alternative 2, we need to simultaneously reject Alternative 3, which invites sprawl into rural Kitsap, and Alternative 1, which has promoted the development of land with minimal restraints. The commitment to prevent sprawl may require hard choices such as removing or changing current zoning options.

For example, the Port Gamble S'Klallam tribe calls for removing the Rural Residential (RR) designation from future zoning changes. Landowners would maintain all their current rights to use their land within the existing zoning, but it would remove that zoning option for the future. A policy action such as removing the Rural Residential designation for the future represents the responsibility of policymakers to balance the existing rights of landowners with the need to protect our shared environment and the health and well-being of everyone in the county. It removes past assumptions that landowners have the right to a change in zoning simply because they desire to use their land beyond what was allowed, or wish to increase its value above its current zoning.

*Rural Kitsap is not just “vacant undeveloped land.”* It is the habitat of many species, provides essential ecological functions that support the whole of the county and its residents and contributes to quality of life and the defining character of Kitsap County.

### **3) Support affordable and vibrant communities, not solely affordable housing.**

Growth should not come at the expense of current residents or our shared natural resources. Focus on retaining current Kitsap residents and their future generations ahead of efforts to attract people from outside the County. Similarly prioritize retaining the rich and diverse naturally functioning ecology that we still have.

Work with residents and developers to concentrate housing in the core centers of UGAs and provide missing middle housing appropriate for the location. Do this so that the outcome is *affordable living* not solely affordable housing. Urban density incentivizes retail commerce, restaurants, and entertainment which creates a vibrant, energizing atmosphere.

Work closely with the four cities in Kitsap County to implement the UGA focus for affordable living, transportation, and services offered by separate taxing districts such as fire, water, health, police, library, and metropolitan park districts. Track building permits to monitor the actual progress of the goal of meeting the housing mandate for multifamily/ missing middle housing. There needs to be a system developed to stay on track before a five year look back.

### **4) Focus on Transportation that supports affordable living, healthy communities, and the natural environment.**

Focus on reliable public transportation as well as non-motorized transportation infrastructure such as shared-use paths and bike lanes. Such transportation connects where people live, work, and shop rather than ones that are primarily for tourism or recreation. Balance tourism and recreation so that it does not draw resources away from the transportation needs of the residents. Consider protected bike lanes (also called cycle tracks) that are located within a street right-of-way but physically protected from it, often by a row of parked cars or planted strip. Consider slow-flow and yield-flow streets; when low-volume streets are properly designed for low speed, they can be shared among cars, trucks, and bikes without markings.

Collaborate with cities and the state on transportation issues. This collaborative approach builds connections within the county, with neighboring counties, and with the rest of the state, fostering a sense of unity and shared responsibility. By addressing the inaccuracies of traffic planning (WSDOT letter dated 2-26-24 – [20240229\\_DEIS\\_Comment\\_Matrix\\_p563](#)—about the phased review, local roadway level of service (LOS) standards, and project funding), we can ensure a more efficient and effective transportation system for all.

Frame transportation as one type of connectivity that supports affordable communities and living and protects the environment. Consider where other types of connectivity (for example, internet connections) can reduce the need for physically transporting people from one location to another.



**5) Prioritize diverse local economies that provide a living wage and quality of life for all residents and support earth’s regenerative systems.**

Promote local economies that provide the opportunity to live and work in one’s community.

Support and strengthen local agriculture to ensure the economic viability of our farms, increase access to local food, and foster healthy, thriving rural communities.

Prioritize local businesses that foster community without compromising the environment. Create economic opportunities that revitalize and replenish our natural resources. Develop policies that encourage the establishment of businesses that benefit individuals and enhance biodiversity and resilience of native plant, animal, and fungi species, water quality and quantity, air quality, and food security for all species. Strive for overall ecological gains that offset any short-term losses.

**6) Foster localized planning congruent with its land use zones and ecological conditions.**

Honor the qualities of specific locations, environments, and all inhabitants, including wildlife. Add programs within DCD that monitor, measure, and quantify the impacts of development on critical areas and natural resources to make “no net loss” meaningful.

Incentivize all LAMIRDS, rural villages, and rural communities to understand the applicability of the Preferred Alternative to their situation and develop their own framework and strategy for their setting. Similarly, encourage neighborhoods within UGAs to rethink and plan for their situation with broad community/neighborhood engagement.

**7) Assess the range of physical and ecological attributes in our entire Park system, defining both natural preserves and active recreation areas.**

Large parks, especially the six Heritage Parks, are located close to most Kitsap residents and represent the essence of what it means for many to live here. The ecology of these important parks serves as habitat for critical wildlife, improves air and water quality, enhances resilience to climate change, and provides a variety of recreational opportunities.

The Heritage Parks specifically need plans that start by clearly identifying and describing each park’s suite of natural, physical, and public use attributes, and then work up from that base to determine appropriate needs and uses. (That process follows the existing PROS Plan policy, which we support.) Only select those activities that can protect and restore the full range of diversity essential for life. Use the goal of “net ecological gain” in this work and involve the public, park users, and volunteers in that task.

As a start, engage an appropriate and broad range of people and perspectives to evaluate whether the Port Gamble Forest Heritage Park’s existing unapproved master plan/framework supports Alternative 2, versus 1 or 3. Redesign the plan, including resource assessments per the PROS Plan, with community perspectives represented and a transparent and fair planning process. *Do not approve the current framework until this redesign work is done in light of the Preferred Alternative.*

In the process of this work, ensure that guidelines and definitions for the multiple types of parks in Kitsap are developed with input from a broad range of people.

**8) Revamp budgetary plans, capital facilities, and utilities to be consistent with the focus of affordable living and community within UGAs.**

Our past priorities, such as heavy use of natural resources (Alternative 3) or single-family housing developments (Alternative 1), are outdated. Let's shift our focus to community-building, a powerful tool to engage residents in service to our community, fostering a sense of connection and shared responsibility.

One example of where that can be done is with Parks. The Parks need to be supported and protected, and volunteers are an important component of that support. They donate many hours of their time each year to that effort. That dedication should be acknowledged, and their participation and consultation should be encouraged by the Parks Department. Essential though the stewards and other volunteers are, Parks also needs adequate funding to manage this important asset, and it needs to clearly identify both its current as well as future capital and operational needs, in a comprehensive master plan. Some of this was laid out in the 2018 PROS plan, but that plan needs to be revised. Major projects should not be initiated in the parks until this work is done first.

Another example would be the apparent lack of agreement among various departments, administrators, decision-makers, and the public about the Sound to Olympic (STO) shared use path.

**9) Focus on public engagement of the full range of residents (ethnicity, economic, skills, interests) to build community, reduce financial expenditures, create new businesses that protect and restore the environment, and create greater civic engagement.**

Ensure fair and just public engagement of the full range of stakeholders and residents of the county in decision-making that affects them. Conduct a review of advisory groups of all types to see if their representation and perspectives are in line with the focus of Alternative 2. Include monitoring processes, and greater education of the general public about what constitutes a healthy ecosystem and our individual and collective roles in supporting it. Ensure greater attention to the full range of types of people and perspectives needed.

**10) Ensure the final draft Comp Plan is framed in terms of fulfilling the Preferred Alternative.**

Reduce or remove the goals, policies, and strategies in the current draft Comp Plan that are incongruent with the Preferred Alternative, or support Alternatives 1 or 3. Consider structural changes in the county administration, with partners, and with local groups. Plan public education and engagement for late 2024 and in 2025 on how to jointly implement the plan. The plan is not the end goal. It is the beginning of new ways of functioning for everyone. *Prepare implementation plans that engage us all.*

## **Ten Principles for the Preferred Land Use Decision**

On March 26, the Kitsap County Planning Commission released its recommendation for the preferred land use alternative for the County's 2024 Comprehensive Plan. We of the **Kitsap Environmental Coalition** (KEC) Steering Committee support the direction of the recommendation and we look forward to continuing to work with the County toward the completion of this Plan that will define the future of Kitsap. That work should be guided, we believe, by the following principles:

### **1) Prioritize climate and environmental conditions in planning for the next 20 years.**

It is important to recognize that human action should include caring for people and the planet. Maintaining the health of Earth, on which our existence depends, must take precedence, and we should treat nature as the foundation of life itself, not simply as an asset for humans to use. Give high priority to the protection and regeneration of our ecosystems for the well-being of current and future generations of all Kitsap inhabitants, including wildlife.

Environmental conditions are changing more rapidly and unpredictably than in the past, and we need to give more explicit attention to climate change and its impact on the County's development. This includes reducing our county's contributions to climate change and prioritizing resiliency.

One way to signal this priority is by putting the climate and environment chapters of the Comp Plan first. Another is to lead by example, visibly implementing smart energy in county facilities and vehicles. Likewise, building public awareness and engagement through educational programs and incentives is essential.

### **2) Emphasize Land Use Alternative 2, which centers on concentrating housing in the core of the UGAs and focuses on the missing middle housing.**

In stating support for Alternative 2, we need to simultaneously reject Alternative 3, which invites sprawl into rural Kitsap, and Alternative 1, which has promoted the development of land with minimal restraints. The commitment to prevent sprawl may require hard choices such as removing or changing current zoning options.

For example, the Port Gamble S'Klallam tribe calls for removing the Rural Residential (RR) designation from future zoning changes. Landowners would maintain all their current rights to use their land within the existing zoning, but it would remove that zoning option for the future. A policy action such as removing the Rural Residential designation for the future represents the responsibility of policymakers to balance the existing rights of landowners with the need to protect our shared environment and the health and well-being of everyone in the county. It removes past assumptions that landowners have the right to a change in zoning simply because they desire to use their land beyond what was allowed, or wish to increase its value above its current zoning.



*Rural Kitsap is not just “vacant undeveloped land.”* It is the habitat of many species, provides essential ecological functions that support the whole of the county and its residents and contributes to quality of life and the defining character of Kitsap County.

### **3) Support affordable and vibrant communities, not solely affordable housing.**

Growth should not come at the expense of current residents or our shared natural resources. Focus on retaining current Kitsap residents and their future generations ahead of efforts to attract people from outside the County. Similarly prioritize retaining the rich and diverse naturally functioning ecology that we still have.

Work with residents and developers to concentrate housing in the core centers of UGAs and provide missing middle housing appropriate for the location. Do this so that the outcome is *affordable living* not solely affordable housing. Urban density incentivizes retail commerce, restaurants, and entertainment which creates a vibrant, energizing atmosphere.

Work closely with the four cities in Kitsap County to implement the UGA focus for affordable living, transportation, and services offered by separate taxing districts such as fire, water, health, police, library, and metropolitan park districts. Track building permits to monitor the actual progress of the goal of meeting the housing mandate for multifamily/ missing middle housing. There needs to be a system developed to stay on track before a five year look back.

### **4) Focus on Transportation that supports affordable living, healthy communities, and the natural environment.**

Focus on reliable public transportation as well as non-motorized transportation infrastructure such as shared-use paths and bike lanes. Such transportation connects where people live, work, and shop rather than ones that are primarily for tourism or recreation. Balance tourism and recreation so that it does not draw resources away from the transportation needs of the residents. Consider protected bike lanes (also called cycle tracks) that are located within a street right-of-way but physically protected from it, often by a row of parked cars or planted strip. Consider slow-flow and yield-flow streets; when low-volume streets are properly designed for low speed, they can be shared among cars, trucks, and bikes without markings.

Collaborate with cities and the state on transportation issues. This collaborative approach builds connections within the county, with neighboring counties, and with the rest of the state, fostering a sense of unity and shared responsibility. By addressing the inaccuracies of traffic planning (WSDOT letter dated 2-26-24 – [20240229\\_DEIS\\_Comment\\_Matrix\\_p563](#)—about the phased review, local roadway level of service (LOS) standards, and project funding), we can ensure a more efficient and effective transportation system for all.

Frame transportation as one type of connectivity that supports affordable communities and living and protects the environment. Consider where other types of connectivity (for example, internet connections) can reduce the need for physically transporting people from one location to another.

**5) Prioritize diverse local economies that provide a living wage and quality of life for all residents and support earth’s regenerative systems.**

Promote local economies that provide the opportunity to live and work in one’s community.

Support and strengthen local agriculture to ensure the economic viability of our farms, increase access to local food, and foster healthy, thriving rural communities.

Prioritize local businesses that foster community without compromising the environment. Create economic opportunities that revitalize and replenish our natural resources. Develop policies that encourage the establishment of businesses that benefit individuals and enhance biodiversity and resilience of native plant, animal, and fungi species, water quality and quantity, air quality, and food security for all species. Strive for overall ecological gains that offset any short-term losses.

**6) Foster localized planning congruent with its land use zones and ecological conditions.**

Honor the qualities of specific locations, environments, and all inhabitants, including wildlife. Add programs within DCD that monitor, measure, and quantify the impacts of development on critical areas and natural resources to make “no net loss” meaningful.

Incentivize all LAMIRDS, rural villages, and rural communities to understand the applicability of the Preferred Alternative to their situation and develop their own framework and strategy for their setting. Similarly, encourage neighborhoods within UGAs to rethink and plan for their situation with broad community/neighborhood engagement.

**7) Assess the range of physical and ecological attributes in our entire Park system, defining both natural preserves and active recreation areas.**

Large parks, especially the six Heritage Parks, are located close to most Kitsap residents and represent the essence of what it means for many to live here. The ecology of these important parks serves as habitat for critical wildlife, improves air and water quality, enhances resilience to climate change, and provides a variety of recreational opportunities.

The Heritage Parks specifically need plans that start by clearly identifying and describing each park’s suite of natural, physical, and public use attributes, and then work up from that base to determine appropriate needs and uses. (That process follows the existing PROS Plan policy, which we support.) Only select those activities that can protect and restore the full range of diversity essential for life. Use the goal of “net ecological gain” in this work and involve the public, park users, and volunteers in that task.

As a start, engage an appropriate and broad range of people and perspectives to evaluate whether the Port Gamble Forest Heritage Park’s existing unapproved master plan/framework supports Alternative 2, versus 1 or 3. Redesign the plan, including resource assessments per the PROS Plan, with community perspectives represented and a transparent and fair planning process. *Do not approve the current framework until this redesign work is done in light of the Preferred Alternative.*

In the process of this work, ensure that guidelines and definitions for the multiple types of parks in Kitsap are developed with input from a broad range of people.

**8) Revamp budgetary plans, capital facilities, and utilities to be consistent with the focus of affordable living and community within UGAs.**

Our past priorities, such as heavy use of natural resources (Alternative 3) or single-family housing developments (Alternative 1), are outdated. Let's shift our focus to community-building, a powerful tool to engage residents in service to our community, fostering a sense of connection and shared responsibility.

One example of where that can be done is with Parks. The Parks need to be supported and protected, and volunteers are an important component of that support. They donate many hours of their time each year to that effort. That dedication should be acknowledged, and their participation and consultation should be encouraged by the Parks Department. Essential though the stewards and other volunteers are, Parks also needs adequate funding to manage this important asset, and it needs to clearly identify both its current as well as future capital and operational needs, in a comprehensive master plan. Some of this was laid out in the 2018 PROS plan, but that plan needs to be revised. Major projects should not be initiated in the parks until this work is done first.

Another example would be the apparent lack of agreement among various departments, administrators, decision-makers, and the public about the Sound to Olympic (STO) shared use path.

**9) Focus on public engagement of the full range of residents (ethnicity, economic, skills, interests) to build community, reduce financial expenditures, create new businesses that protect and restore the environment, and create greater civic engagement.**

Ensure fair and just public engagement of the full range of stakeholders and residents of the county in decision-making that affects them. Conduct a review of advisory groups of all types to see if their representation and perspectives are in line with the focus of Alternative 2. Include monitoring processes, and greater education of the general public about what constitutes a healthy ecosystem and our individual and collective roles in supporting it. Ensure greater attention to the full range of types of people and perspectives needed.

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## Parks, Recreation, and Open Space Element

NOTE: With the Parks Recreation and Open Space Plan process running concurrently with the Comprehensive Plan update, this element is very draft with many potential changes to come from public input.

### Vision

In partnership with other agencies and organizations, the County envisions enhancing its park facilities, and developing new parks, while emphasizing the importance of sustainable land management that promotes environmental protection and climate resilience within the park system. Parks with large areas, such as heritage parks, have a dual management mandate of providing quality visitor experiences and protecting wildlife and habitat. Indeed, protection and restoration of natural habitat, wildlife refugia and corridors, and sensitive areas with buffers are key for realizing quality experiences of the natural environment.

The County's vision for parks is to create a thriving and accessible park system that meets the diverse needs and interests of the community. The park system offers ~~recreational opportunities~~ and the preservation and stewardship of **critical** natural resources and **provides recreational opportunities**. This vision ~~recognizes the County's role in providing outdoor recreation areas and facilities that~~ contributes to the overall quality of life for its residents and aims to ensure equitable access to parks for all community members.

### Intent

This chapter of the Comprehensive Plan serves as a reference and foundation for future updates of the County's Parks, Recreation, and Open Space (PROS) Plan. **It has to start with an assessment of the natural resources to be found in each of the parks and their value for wildlife, habitat, as well as native plants.** This chapter provides an outlook for the County's park system, identifying areas for improvement and presenting innovative approaches based on public input and community engagement. To make these aspirations actionable, the next update of PROS Plan (anticipated to be complete in 2024) will implement the goals, policies, and strategies in this

chapter, detailing specific projects, initiatives, and timelines for park development and enhancement. It will identify opportunities for partnerships and funding and foster collaboration with stakeholders to ensure equitable access, environmental stewardship, and diverse recreational opportunities for the community.

The goals and policies in this element recognize County residents' interests in promoting pedestrian use, bicycling, and accessibility through the provision of trails in park system as well as the desire to institute management programs for habitat value, forest health, groundwater recharge, water quality, climate resiliency, and safety.

Technical documents used in development of this Element include an inventory of current parks facilities, level of service standards, and other requirements outlined in the Capital the Environmental Impact Statement, the Washington State Growth Management Act, and the Washington Administrative Code.

### Growth Management Act and Regional Coordination

The Washington State Growth Management Act is the framework for all land use planning in the state and lays out the requirements for comprehensive plans and development regulations that implement the plans. The Parks and Recreation Element is a required element and must include:

- Estimates of park and recreation demand for at last a ten-year period;
- Evaluation of parks facilities and service needs;
- Evaluation of tree canopy coverage within the urban growth area; and
- Evaluation of intergovernmental coordination opportunities to provide regional approaches for meeting park and recreational demand.

By aligning with the Growth Management Act (GMA) and the Washington State Recreation and Conservation Office (RCO), this chapter will provide a comprehensive and visionary framework for the parks, recreation, and open space system. In some cases, the County's PROS plan provides additional information related to GMA requirements for this chapter.

This work must also align with regional strategies including Vision 2050 and the Regional Open Space Conservation Plan. These plans aim to protect and enhance a diverse range of public and private open spaces, including urban and rural areas, to provide essential ecological, recreational, cultural, and aesthetic, ~~and ecological~~ services. These plans emphasize equitable access to open spaces and, to achieve this, propose strategies like integrating open space conservation into planning at all levels, enhancing urban open spaces, ~~and protecting and/or restoring critical areas, buffers, and habitats.~~

Additionally, the plans emphasize the need for coordination among agencies and organizations and the promotion of the many benefits of green infrastructure to support mental and physical health, recreational opportunities, habitat preservation, and stormwater management.

### Relationship to Other Elements

The goals and policies in this chapter are an integral part of other elements including *Land Use*,

*Economic Development, Environment, Housing and Human Services, Transportation, Climate Change and Capital Facilities and Utilities.*

Focusing on the inter-related nature of Parks, Recreation, and Open Space to other Comprehensive Plan elements, this Chapter provides the guidance to do the following:

- Manage and maintain parks, recreation facilities, and open space lands;
- Work with cities and other communities for park and open space acquisition projects;
- Provide parks, recreation, and open space facilities and services in an efficient and economical manner;
- Incorporate a network of trails and greenways throughout the County to connect population and employment centers, schools, and public facilities;
-  Manage parks and open space properties for environmental values; preserve and restore environment and wildlife habitat.
- Establish and maintain level of service standards for parkland acreage, equitable access, distribution, function, and maintenance and operations;
- Engage underrepresented communities, including historically underserved groups, low-income populations, and individuals with disabilities, to ensure their access and meaningful participation in park activities;
- Assess and map park specific resources, including sensitive areas and buffers; wildlife use areas, corridors, and existing land features etc. Identify and map impacts of roads and trails on wildlife behavior using best available science on disturbance distances and minimum refugia areas for large mammals. Determine Landscape Classifications and balance wildlife needs with human activities, recognizing that wildlife protection improves visitor experiences. Implement a monitoring plan to survey plants, vertebrates, and invertebrates, and habitat characteristics.
- ~~Attempt to~~ Segregate natural resource protection lands from active/passive recreation elements within ~~each~~ park facilities; and
- Ensure park, recreation, and open space acquisition, facility development, and management is balanced with the required funding and operational budget.

## Background Information

Kitsap County is known for its many distinctive features including its glacier-carved ~~rolling~~ topography, ~~low-land~~ forests, ~~freshwater~~ lakes, inlets, bays, and Puget Sound. Kitsap County's nature-oriented park system reflects this diversity of settings and provides for ~~natural parks as well as~~ developed recreation facilities to serve a population of diverse ages, ethnicities, abilities, and outdoor interests.

Kitsap County's Park system is a comprehensive network comprised of various park types, collectively totaling ~~10,843~~ about 11,000 acres. This diverse range of parks includes heritage parks, waterways and waterfront parks, community recreation complexes, legacy parks, special use parks, and open spaces and greenbelts. Each park type offers distinct recreational opportunities, such as natural landscapes, access to water bodies, community gathering spaces, and areas of historical and cultural significance. The wide variety of parks insures that the park system caters to the diverse interests and needs of the community while promoting equitable access to nature, recreation, and cultural experiences throughout Kitsap County.



Nearly three quarters of all park and open space acreage lies within six heritage parks that have become the cornerstone of Kitsap County's Park system. The 2018 PROS plan states "With the exception of trails running through parts of the parks, these lands remain primarily undeveloped natural areas, with environmentally sensitive areas preserved or enhanced. The physical characteristics of these lands lend themselves to varied passive and conservation uses." A balanced approach that takes into consideration established levels of service, protection of critical areas, historic and cultural values, equitable and inclusive access, and recreation services for the public will be critical to the success of these heritage parks and the park system overall. This will require tradeoffs. No one park can do it all. The carrying capacity and limitations of the park should guide these determinations.

Equally critical is both the long- and short-term stewardship of these lands by the community and County staff, promoting landscapes that endure as legacies for future generations. Through responsible management and preservation practices, these landscapes will remain vibrant and sustainable over time. This stewardship entails adopting strategies that promote health and wellness for the community, recognizing the important role of these parks in preserving nature in addition to fostering physical activity, and mental well-being. ~~and connection with nature.~~

As the challenges posed by climate change increase, it becomes imperative to adapt parks to the changing climate conditions. Climate issues include integrating resilient design principles, implementing sustainable green infrastructure, and supporting habitats that can withstand the impacts of climate change.

## Key Terms

**ADA Standards:** Americans with Disabilities Act (ADA) standards ensure that public facilities and amenities are accessible to individuals with disabilities.

**Climate Resilience:** the capacity of natural areas and recreational facilities to withstand, adapt to, and recover from the impacts of climate change including the ability to withstand extreme weather events, rising temperatures, changes in precipitation patterns, and other climate-related challenges while maintaining functionality and benefits for the community. **By restoring and safeguarding ecosystems on land and the Salish Sea, we help plants and animals to build climate resilience. Nature, in turn, can help us regulate the climate, give us clean, safe water, control pests and diseases and pollinate our crops.**

**Critical Areas:** areas identified as: (a) wetlands; (b) areas with a critical recharging effect on aquifers; (c) fish and wildlife habitat conservation areas; (d) geologically hazardous areas; and (e) frequently flooded areas.


**Equitable Access:** ensuring that all members of a community, regardless of their background, socioeconomic status, age, ability, or location, have fair and inclusive opportunities to access and enjoy parks and recreational facilities. It involves providing equal access to safe, well-maintained, and culturally relevant park spaces, programs, and amenities, fostering a sense of belonging and promoting social, physical, and mental well-being for all individuals within the community.

**Green Infrastructure:** includes a wide array of natural assets and built structures, such as parks and stormwater management facilities, at multiple scales that manage wet weather and that maintain and restore natural hydrology.

**Level of service (LOS):** the specific criteria and standards used to measure and evaluate the adequacy and quality of park facilities, services, and amenities provided to the community. It is a measurable representation of the level of recreational opportunities and resources available to residents and visitors within a defined area and time frame.

**Public Private Partnership:** a collaborative arrangement between a government and private entities to jointly plan, develop, operate, or manage parks and recreational facilities. These partnerships leverage the resources, expertise, and capabilities of both sectors to enhance the quality, accessibility, and sustainability of parks and recreational amenities for the community's benefit.

**Transfer of Development Rights (TDR):** a land use planning strategy that allows for the transfer of development rights from one area (typically rural or environmentally sensitive) to another area (usually urban or designated for higher-density development). In this program, landowners in the sending areas, where development is restricted or limited, can sell their development rights to developers or landowners in the receiving areas, where increased development density or intensity is desired.

**Universal Design Principles:** a set of seven principles and associated guidelines developed in 1997 by a  working group of architects, product designers, engineers, and environmental design researchers. These principles are, in brief: equitable use; flexibility in use; simple and intuitive use; perceptible information; tolerance for error; low physical effort; and size and space for approach and use.

## Parks, Recreation, and Open Space Goals, Policies and Strategies

### Parks Goal 1. Equity

*Provide equitable access to regional parks and open space to meet the recreational and diverse user needs for active healthy communities, while sustaining the natural environment.*

~~**Parks Policy 1.1.** Develop Park facilities to accommodate specialized activities, large special events, and athletic tournaments to meet current and future demand.~~

**Parks Policy 1.2.** Develop and upgrade sport field complexes to meet the needs of organized recreation activities, ~~using public and private partnerships where possible.~~

**Parks Policy 1.3.** Restore, manage, and protect the natural and cultural resources within Kitsap County Parks for the benefit of the greater community and for future generations to safely enjoy.

**Parks Policy 1.4.** Ensure geographic distribution and equitable access to park facilities.

**Parks Policy 1.5.** Develop and redevelop County parks **where needed** to provide equity of service and activities offered for all demographics and accessibility levels.

**Parks Policy 1.6.** Limit impacts to vulnerable and underserved populations when locating park facilities.

~~**Parks Policy 1.7.** Maintain and enhance a balance between the economic benefits of tourism and the local quality of life.~~

~~**Parks Policy 1.8.** Design and develop facilities that will encourage tourism.~~

**Parks Policy 1.9.** Develop ~~and redevelop certain County parks and~~ the Fairgrounds and Events Center to become **a “destination facilityies”**.

~~**Parks Policy 1.10.** Coordinate regional parks development and operation with regional trails and other trail systems.~~

~~**Parks Policy 1.11.** Implement universal design principles in park planning and development to ensure that park amenities and facilities are accessible to individuals of all ages and abilities.~~

**Parks Policy 1.12.** Offer a diverse range of cultural programming and events within parks that celebrate the community's various cultural traditions and preferences, fostering a sense of belonging and cultural appreciation.


**Parks Strategy 1.a.** Carefully consider the acquisition of lands with characteristics that offer opportunities for diverse recreational uses while ensuring adequate resources are available to maintain and operate these facilities into the future.

**Parks Strategy 1.b.** Create new and foster current partnerships with local, state, and federal government agencies and organizations.



**Parks Strategy 1.c.** Continue to support and maintain the Parks and Recreation Advisory Board to include community involvement and conduct public outreach. **Include park users and Stewardship groups in the PAB.**

~~**Parks Strategy 1.d.** 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 align with County goals and policies.~~

~~**Parks Strategy 1.e.** Continue discussions of projects and strategies include  the recommendations of the Port Gamble Forest Heritage Park Framework.~~

~~**Parks Strategy 1.f.** Implement strategies from the Non-Motorized Facility Plan when investing in the development and maintenance of the park system.~~

**Parks Strategy 1.g.** Collaborate with transportation agencies to improve public transportation connections to parks, ensuring that individuals without private vehicles have safe and reliable access to recreational opportunities.

**Parks Strategy 1.h.** Develop Park funding allocation criteria in a manner that prioritizes and supports projects aimed at enhancing park accessibility and inclusivity, ensuring equitable distribution of resources throughout the community.

## **Parks Goal 2. Funding**

*Provide appropriate and necessary funding and resources to support the management and maintenance of parks, facilities, and open space lands of the highest quality possible.*


Parks Policy 2.0 Define funding and staffing needs for planning period.

**Parks Policy 2.1.** Establish stable funding sources to support the County's parks system.

**Parks Policy 2.2.** Facilitate partnerships with community organizations, **like Americorps,** businesses, non-profits, and other government organizations to promote and maintain parks facilities and open space to help offset expense burdens.

**Parks Policy 2.3.** Encourage the development of multi-use indoor activity centers, through public/private partnerships where possible, to provide year-round recreational opportunities, meeting the needs of the population.

**Parks Policy 2.4.** Design and develop recreational facilities that require limited maintenance.

**Parks Policy 2.5.** Explore and implement innovative funding and operational methodologies to effectively manage, provide, and enhance quality parks, recreation, and open space experiences, opportunities, and facilities. 

**Parks Policy 2.6.** Establish necessary staffing levels to support the growing needs of the Parks Department.

**Parks Policy 2.7.** Invest in upgrades to existing facilities to bring them up to Americans with Disabilities Act (ADA) standards.

**Parks Policy 2.8.** Develop and redevelop County parks to accommodate the preferences and needs of all visitors and residents with particular attention to historically marginalized, elderly, persons with disabilities, young, and low-income populations.



**Parks Policy 2.9.** Develop and redevelop County parks in a manner that allows all-weather activity where feasible.

**Parks Policy 2.10.** Provide visitor accommodations including trailheads, parking, and restrooms where needed, appropriate, and as funds allow.

**Parks Policy 2.11.** Recognize parks as an important component of Kitsap County's economy, climate resiliency, and quality of life.

**Parks Policy 2.12.** Integrate sustainable practices in park management and maintenance to reduce operational costs and minimize the environmental impact of park facilities.

**Parks Strategy 2.a.** Implement the Parks, Recreation and Open Space Plan to strategically acquire and develop open space, greenways, and wildlife habitat using allocated funds to ensure responsible and sustainable growth.



**Parks Strategy 2.aa Identify capital funding needs, including acquisition, deferred maintenance projects, and ADA upgrad projects.**

**Parks Strategy 2.bb Prepare long-term and six-year capital funding plans,**

**Parks Strategy 2.cc Identify six-year O&M funding and staffing needs.**

**Parks Strategy 2.b.** Provide dedicated funding to establish a formal, ongoing capital maintenance and improvement program (e.g., countywide metropolitan parks district).

**Parks Strategy 2.c.** Form partnerships with community groups to maintain natural areas and trails collaboratively and effectively. **Empower volunteer citizens and stewardship groups to monitor and maintain parks.**

**Parks Strategy 2.d.** Encourage homeowner associations and property owners to work with parks agencies and land trusts to effectively maintain buffers and open space within and around developments.

**Parks Strategy 2.e.** Prioritize sustainability in all aspects of park planning, development, and maintenance, emphasizing resource efficiency, water conservation, carbon reduction, waste reduction, and environmental awareness, **protecting habitat and wildlife.**

**Parks Strategy 2.f.** Explore a countywide Metropolitan Parks District to establish secure long-term funding for parks projects and efforts.

### **Parks Goal 3. ~~Efficiency~~ Acquisition**

*Establish a land acquisition strategy, including the necessary funding, that will facilitate a more efficient service delivery model.*



Parks, Recreation, and Open Space Element

**Parks Policy 3.1.** Prioritize the acquisition of trail ~~corridors~~-**routes** that connect parks, schools, residential, and urban areas where financially feasible.



**Parks Policy 3.2.** Integrate reusable grey water in parks, golf courses, and other high use public facilities when feasible.

**Parks Policy 3.3.** Utilize low impact development techniques within Kitsap County Parks when practical.

**Parks Policy 3.4.** Coordinate with Transfer of Development Rights (TDR) program, as needed, for the development of trails in rural areas through acquisitions or easements under the TDR program.

**Parks Strategy 3.a.** Develop a land acquisition evaluation method to ensure new properties meet specific criteria such as proximity to urban growth areas, multi-functional corridors, climate resilience, cultural significance, equitable access, and achieve desired goals.



**Parks Strategy 3.b.** Purchase lands along the lower main stem of Chico Creek Watershed as recommended in the Chico Creek Main Stem Restoration Plan.

## **Parks Goal 4. Water Access**

*Provide physical and visual public access opportunities and space for diverse forms of water-oriented recreation in such a way that private property rights, public safety, and shoreline ecological functions and processes are protected in accordance with existing laws and statutes.*

**Parks Policy 4.1.** Support and promote the Kitsap Peninsula Water Trail.

**Parks Policy 4.2.** Prioritize acquisition of properties that provide access to public tidelands to maximize public access.

**Parks Policy 4.3.** Ensure waterfront facilities and infrastructure are designed to accommodate people of all ages, abilities, and mobility levels.

**Parks Policy 4.4.** Consider ranges of compatible uses in our regional parks.

**Parks Strategy 4.a.** Identify and consider opportunities to increase public access and foster environmental and economic benefits associated with Kitsap Peninsula Water Trails and designation as part of the National Water Trails System.

**Parks Strategy 4.b.** Conduct accessibility assessments of waterfront facilities and implement improvements, such as accessible pathways, ramps, and seating areas, to ensure equitable access for individuals with diverse mobility needs.


**Parks Strategy 4.c.** Prioritize ecological restoration efforts and adopt best management practices to protect shoreline ecosystems and promote habitat conservation while accommodating water-oriented recreation.

**Parks Strategy 4.d.** Remove waterfront bulkhead and restore beach at Silverdale Park.




## Parks Goal 5. Environmental Compatibility

*Provide regional parks and open space for passive recreation that preserves the ecological needs of wildlife.*

**Parks Policy 5.1.** Support development of a regional trail system throughout the County and recognize that trails, when built, must be sensitive to the impact on the natural environment. 

**Parks Policy 5.2.** Incorporate the Local Habitat Assessment completed by Washington State Department of Fish and Wildlife to assist in identifying crucial corridor areas that may not necessarily be identified in the Shoreline Master Program or the Critical Areas Ordinance.

**Parks Policy 5.3.** When implementing the Parks, Recreation, and Open Space Plan, ensure that coordination with Washington State Department of Fish and Wildlife, local Tribes, and other relevant stakeholders occurs to ensure protection of treaty reserved natural and cultural resources.

**Parks Policy 5.4.** Kitsap County's Parks Department will strive to limit conflict between wildlife and humans and decrease impact on habitat by improving identification of protected areas using the Kitsap Natural Resource Asset Management Program as an information source. 

**Parks Policy 5.5.** Prioritize redevelopment of existing impacted areas over disturbing undeveloped areas.

**Parks Policy 5.6.** Kitsap County Parks Department will continue to improve educational efforts and signage regarding the importance of limiting contact with wildlife and the value of habitat preservation.


**Parks Policy 5.7.** ~~Mitigate~~ **Limit** tree canopy cover loss due to increased development while striving to utilize best forest management practices in restoring areas to maintain green space, enhance carbon sequestration, and mitigate GHG emissions within Kitsap County Parks.

~~**Parks Policy 5.8.** Locate and design trail corridors to also serve wildlife when possible.~~

**Parks Policy 5.9.** Ensure that the County's Parks, Recreation, and Open Space Plan is consistent with habitat inventories, habitat protection, restoration programs, natural resource management policies, and County code.

**Parks Policy 5.10.** Incorporate climate resilience principles into park and open space management plans, using adaptive management strategies to monitor and respond to climate-related changes.

**Parks Strategy 5.a.** Educate citizens on natural resources, forest stewardship, wildlife, and forest ecology, including native flora and fauna indigenous to the Pacific Northwest.

**Parks Strategy 5.b.** Identify both acquisition and preservation opportunities for open space in rural areas. 

**Parks Strategy 5.c.** Identify, assess, and prioritize parks resource areas for their suitability for recreational uses and needs for habitat restoration or preservation, utilizing the Kitsap Natural Resource Asset Management Program as a tool.

**Parks Strategy 5.d.** Develop individual forest management plans for regional and heritage parks.

**Parks Strategy 5.e.** Develop a climate sustainability and resiliency management plan for Parks-owned properties.

~~**Parks Strategy 5.f.** Identify and designate specific areas within regional parks and open spaces that serve as multi-functional corridors, integrating both recreational opportunities and wildlife habitat connectivity.~~

**Park Strategy 5.f** Ensure that Parks has the needed expertise to implement these strategies.

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Kitsap County Commissioner Katie Walters  
Kitsap County  
619 Division Street, MS - 4  
Port Orchard, Washington 98366

RE: 2024 Comprehensive Plan Map Correction Request for Parcel # 102501-3-009-2009

Dear Commissioner Walters,

I write to request your urgent assistance regarding correction of a mapping error that is included in the draft 2024 Kitsap County Comprehensive Plan. The mapping error in question is in relation to parcel # 102501-3-009-2009, and the mistaken inclusion of this rural, vacant, and undevelopable parcel unfortunately has been erroneously included within the Silverdale Urban Growth Area. I appeal to my elected representative as my last opportunity to be heard as a citizen of Kitsap County

The 2024 Kitsap County Comprehensive Plan is the sole opportunity for Kitsap County to shape its housing and employment future for a 20+ year planning horizon. The need for viable land for new housing is a paramount need in Kitsap County and is a core element of the success of our community. Your decisions in these matters shape all our future for decades to come. Correcting this map error, and ensuring we have sound decisions, and a supportable plan is the action expected of our elected officials in accomplishing those goals for our collective future.

The map error undermines the goals and policies of the Growth Management Act and our urban growth areas in inclusion of viable, developable land for housing. This ten-acre property should never have been included in any UGA. I have attached critical area maps for your consideration in rectifying this mistake.

This property does not and will not accomplish the goals and mission of the 2024 Kitsap Comprehensive Plan. This undeveloped parcel is nearly vertical, with steep slopes, geologic hazards, and critical areas that render the property undevelopable as urban low residential. The current designation of this parcel within these maps provides no benefit to Kitsap County future development, or any future expansions of the Silverdale UGA. This parcel is accessed from NW Sigurd Hanson Road, off Central Valley Road to the East, via a combination of private driveways. The requested map change will not affect any urban or rural housing calculations



due to the sheer inability to allocate any viable housing units or urban services to this undevelopable parcel.

This sole parcel at the very periphery of the Silverdale Growth Area, only provides a steep transition and physical barrier between the Rural property of Central Valley and the Urban properties up at Ridgetop Boulevard. There is no access to urban transportation corridors, no access to sewer or other required utilities, and no access to needed urban services. This property should be returned to a Rural Residential designation. We have approached Kitsap County staff to no avail regarding this property, and thus our desperation.

This map correction is desperately needed to correct this mapping error, before the 2024 Comprehensive plan is adopted and incorrectly assumes that this parcel can accomplish any of the goals or housing needs for Kitsap County. This request is about doing what is right for our community and for the future.

Commissioner Walters, I and my family implore you to please consider this desperate request for assistance in this map correction for parcel number parcel # 102501-3-009-2009, to be correctly designated as Rural Residential in the adoption of the 2024 Kitsap County Comprehensive Plan.

I look forward to your response to our request and thank you so much for all the great work that you do for our community, it is so appreciated.

Sincerely,

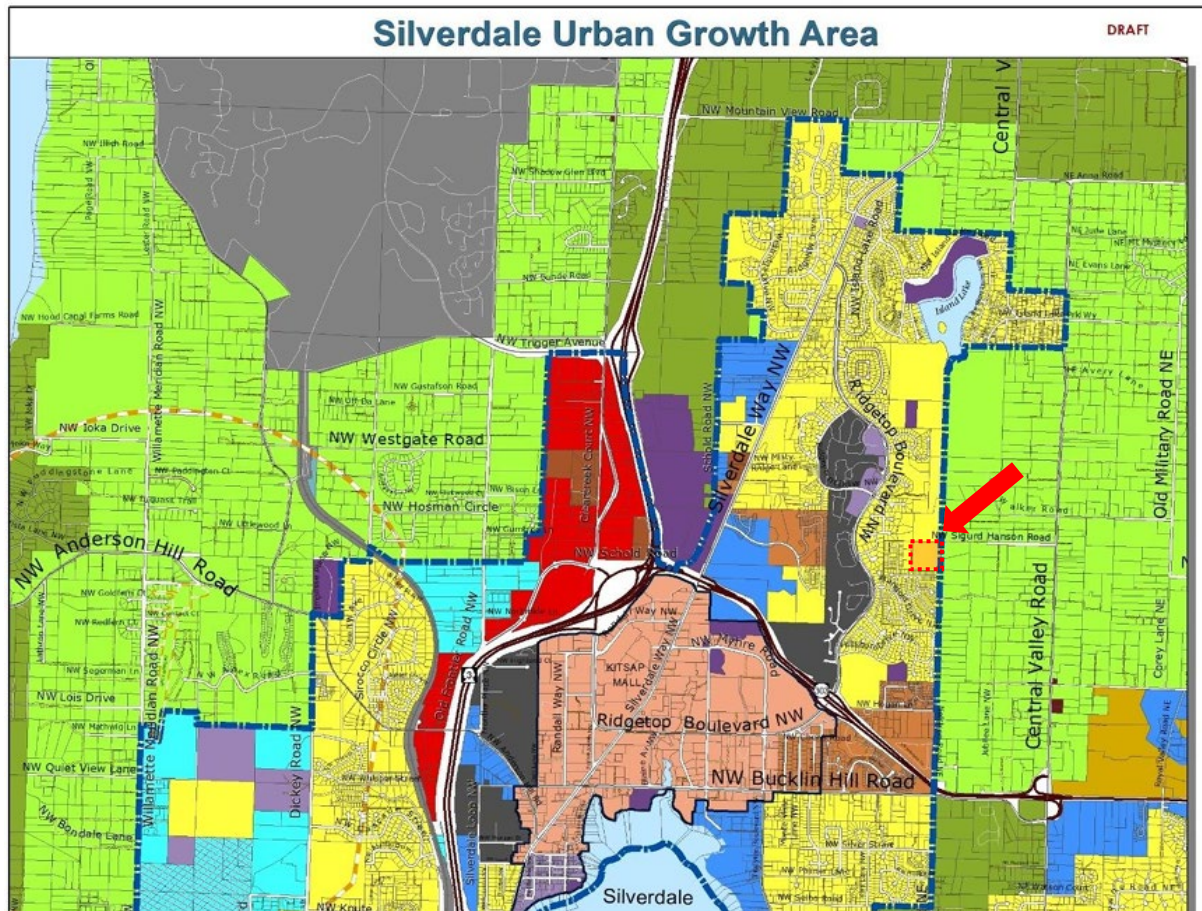
*William Turner*

William Turner & family

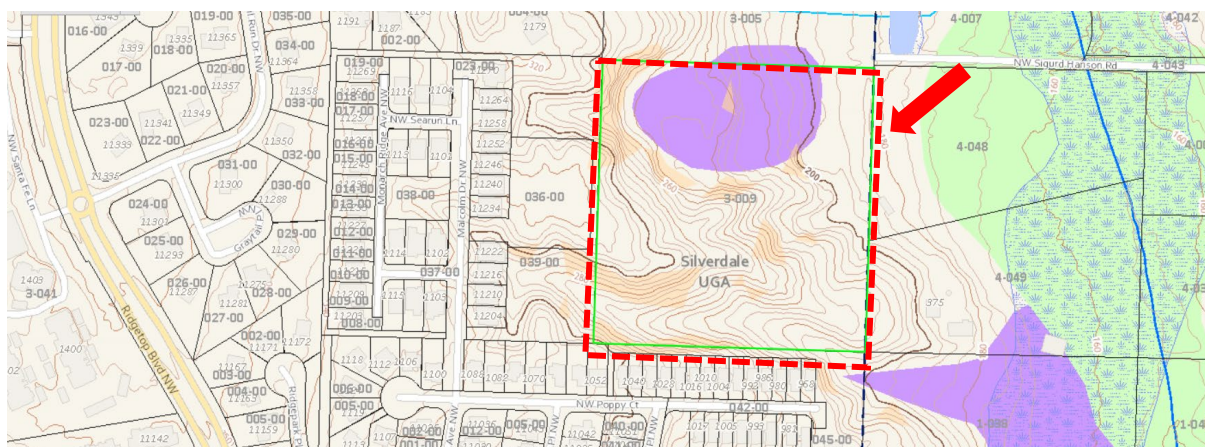
CC: Kitsap County Commissioner, Kristine Rolfes, 619 Division St. Port Orchard, WA 98366  
Kitsap County Commissioner, Charlotte Garrido, 619 Division St. Port Orchard, WA 98366

Incl: Exhibit A: Maps & Critical Area related to Map Correction of Parcel #102501-3-009-2009

## EXHIBIT A: MAPS & CRITICAL AREAS RELATED TO PARCEL # 102501-3-009-2009



LOCATION OF PARCEL # 102501-3-009-2009 IN RELATION TO 2024 SILVERDALE UGA



CRITICAL AREAS, STEEP SLOPES, GEOLOGICAL HAZARDS AND INACCESSIBILITY OF PARCEL

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My name is Charlie Michel. I am a registered Petroleum Engineer in the State of Alaska, retired, I now live in Bremerton.

I read with disappointment about the new gas station going in at the intersection of Bond Road and Gunderson Rd in North Kitsap. In my testimony to the Planning Commission regarding the Comp plan, I urged the County to “stop burning stuff”, one example being to purchase only electric vehicles for the county fleet. This testimony and follows on from that, to prohibit further construction of gas stations in our county.

Do we really need any more gas stations? Are there long lines of cars queuing up for gas other than at Costco? How far do residents have to drive for gas? Research by Coltura has found that the U.S. has roughly twice the number of gas stations per capita and per car as in Europe. Clearly, the purpose of new gas stations in many cases is not a matter of community need.

Sales of electric cars are robust, new models are being introduced frequently, and upfront sticker prices are coming down. Multiple independent analyses have substantiated that the lifetime cost of electric vehicles is significantly lower than gasoline equivalents. Overall, the economic and market trend is heading away from fossil fuels, including gasoline and diesel, toward cleaner electric vehicles and charging infrastructure.

Air quality is an additional issue to the greenhouse gas emissions. Air quality refers to the local “nose level” pollution at, in this case, gas stations. Gas stations emit several toxic compounds from the vapors escaping from fueling nozzles, tank vent pipes, and spillage. This includes known carcinogens such as benzene. A 2018 Columbia University study found that these emissions are higher than previously estimated. Gasoline drips at a typical Costco fueling station total 2,000 gallons per year. Underground fuel tank leaks can contaminate soil. More tanks in the ground mean more leaks. We need to replace the old tanks we have now at gas stations with new, safer ones.

We have enough gas stations in our county. The Commissioners need to put a moratorium on any more. We should instead focus on expanding electric vehicle charging infrastructure.

Below are model ordinances from California prohibiting new stations.

Let’s move toward green energy with a greener future.

## **The following are cities that have adopted ordinances, in chronological order:**

**Petaluma.** The first city in the United States to institute a prohibition on new gas stations was Petaluma, California, approved unanimously on February 22, 2021. Here is the [Petaluma Ordinance and attachments 1-7](#). And here is CONGAS’s [Letter of Support](#) for the prohibition.

**Calistoga** (Napa County). The second city, December 2021. Agenda [Staff Report](#) which includes the draft ordinance.

**Rohnert Park.** [Moratorium](#) (January 2022), and [Permanent Prohibition](#) (March 2022)

**Sebastopol.** April 19, 2022 – [Ordinance](#).

**Cotati.** [Resolution](#) – July 26, 2022

**Santa Rosa** [Ordinance](#) – August 23, 2022

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## NK will Benefit from Open Space with approval of the Rezone and Cluster development.

### Background: Rayonier's Departure

- Rayonier Corporation says it will discontinue tree farming on 600 acres of its land at the SE corner of Port Gamble Forest Heritage Park, (PGFHP).
- Rayonier indicates it will harvest the property's marketable timber over the next few years.
- It states it will sell about 400 acres of this land, but retain about 200 acres around the sand pit.
- The property is now divided into 20 acres parcels, currently zoned as rural wooded.

### Why the public interest?

Since the last timber harvests, the property to be sold has been a mostly wooded area that provides habitat and corridors for wildlife and open space for public hiking and biking on logging roads and trails.

- Several popular biking and hiking routes within the PGFHP continue across the Rayonier property, leading to parking along Port Gamble Road.
- The hiking and biking trails that cross the Rayonier property are, in effect, entrances to the Heritage Park and are used by the public as if they were part of the PGFHP.

### Plan for Development

Raydient has applied for parcel subdivision and rezoning into 80 lots of 5 acres each.

Their announced plan for development when the subdivision is approved includes:

- The 80 residential units would be situated in clusters as reportedly allowed by the GMA
  - relatively small individual parcels, (each sized about 1 to 2 acres)
  - efficient common road systems for each cluster
  - efficient routing of utilities to clustered parcels
- The Clustering Concept will support development of homes in a manner that meets the latest environmental standards for:
  - efficient storm water collection, retention, and treatment
  - local sewer treatment for all clustered parcels and public facilities

The area utilized for clustered parcels, their roads, and supporting facilities is estimated at less than 200 acres.

### THE REMAINING 200 ACRES of OPEN SPACE WILL BENEFIT THE COMMUNITY AND ENVIRONMENT

- The majority of the Open Space could be re-forested allowing:
  - Habitat and corridors for native wildlife.
  - Replanting with diverse tree species and understory to reflect a natural eco-system.
  - Preservation and public use of unique bike trails such as Derailed and Dirt Devil.
  - Public access to the PGFHP trails such as Mirkwood and Camelback trails
  - Aquafer recharge without domestic animal or landscaping contamination

Approval of the Rezone and clustered development would effectively be a 200 acre expansion of the PGFHP, and preserve the natural character and beauty of that land.

- Without the various restrictions applied to County Parks, some trail segments could be graded and paved to meet ADA requirements and standards.
- A future NK Community YMCA with swimming pools, indoor courts, and youth programs.
- Some of the Open Space, (20 to 30 acres), could support development of a traditional park facility including:
  - Active Recreation facilities including a complex of fields, courts, and sports facilities.
  - A Field House with indoor courts, practice facilities and multi-purpose areas.
  - Space for Pea Patch Gardens and Community CSA.
  - Dog parks, and picnic areas.
  - Performing Arts amphitheater.

Approval of the Rezone and NKU project provides an opportunity to develop Active Sports and Recreation facilities for the current and projected NK population.

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Suncrest Homes  
Washington Pacific Development  
2035 Eastlake Ave E #103  
Seattle , WA 98102

April 3<sup>rd</sup>, 2024

Regarding Parcel Numbers:

182501-4-049-2001  
182501-4-048-2002  
182501-4-047-2003  
182501-4-046-2004

Kitsap County Board of Commissioners / Planning Commission:

I believe there has been a mistake in regards to the rezoning request of the above parcels. The above parcels are part of the former Howerton Silverdale Landfill and I had requested a rezone to Industrial to accommodate an outdoor RV/ boat / vehicle and contractor storage facility. **Due to the prior landfill use the site has substantial limits as to the reasonable / viable uses for which it can be utilized.**

The proposed 2024 Comp Plan zoning is currently under staff recommendation of NC (Neighborhood Commercial) as part of a Alt 3. Kitsap County staff made the recommendation of NC without my knowledge or knowledge of the prior meetings and determinations of Liz Williams ( Planner) in regards to the property. In the Summer of 2019 we first met with Liz Williams for the purposed land use of an outside RV / Boat / Vehicle and Contractor storage which she informed us requires an Industrial zoning. There were several follow up phone calls and emails on the purposed zoning change prior to her departure. My last discussions with her was that the parcels were being submitted for a zoning change to Industrial with documentation of the parcels being part of the Howerton Silverdale landfill that I had provided at her request. It has been explained to me that staff turnover was the cause of the mistaken proposed zoning and lack of documentation regarding the former land use as a landfill. **I would like to acknowledge exceptional efforts of Scott Diener and Colin Poff in this matter.**

I have had several meetings and conversations with Grant Holdcroft ( Kitsap Health Dept) and his staff as to future use of the property as open storage ( RV , trailer, boat , vehicle and contractor storage) and they concurred it is an appropriate use for the site, and would have no objections to that future use. Documentation of the parcels use as a former landfill / Health Dept determination submitted prior & available as requested.

Parcels ...2001 & ...2003 have existing vegetation buffers on 3 sides that will serve as a screening for Dickey Rd and the Hidden Valley Subdivision. Parcels ...2002 and ...2004 have vegetation screening on the East property line and adjoin the Kitsap Soccer Club to the North (property donated from the landfill site to the Soccer Club). As the original developers and builders of the subdivision, the screening maturity was a priority before any proposed land use was brought forth.

I have emailed the Hidden Valley HOA and attended a homeowner's association meeting to share the proposed future use for the property ( Subdivision directly South & West of the parcels). I have received NO objections to the purposed use from the Hidden Valley Homeowners association.

**The parcels above hold no value or viable use as currently zoned as Urban Low Residential.** My request for rezoning to Industrial is a beneficial land use for the community and for a useful future of the property.

Thank you for your consideration.

Regards,

Darren Vlahovich

Suncrest Homes  
Washington Pacific Development

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4/7/24

To whom it may concern,

I am a resident on the Apex Airport and member of the Apex Properties Owner and Improvement Assoc. (APOIA).

We on the airport would like to see the continuance of APEX Airport into the future as a viable contributing airport to our community.

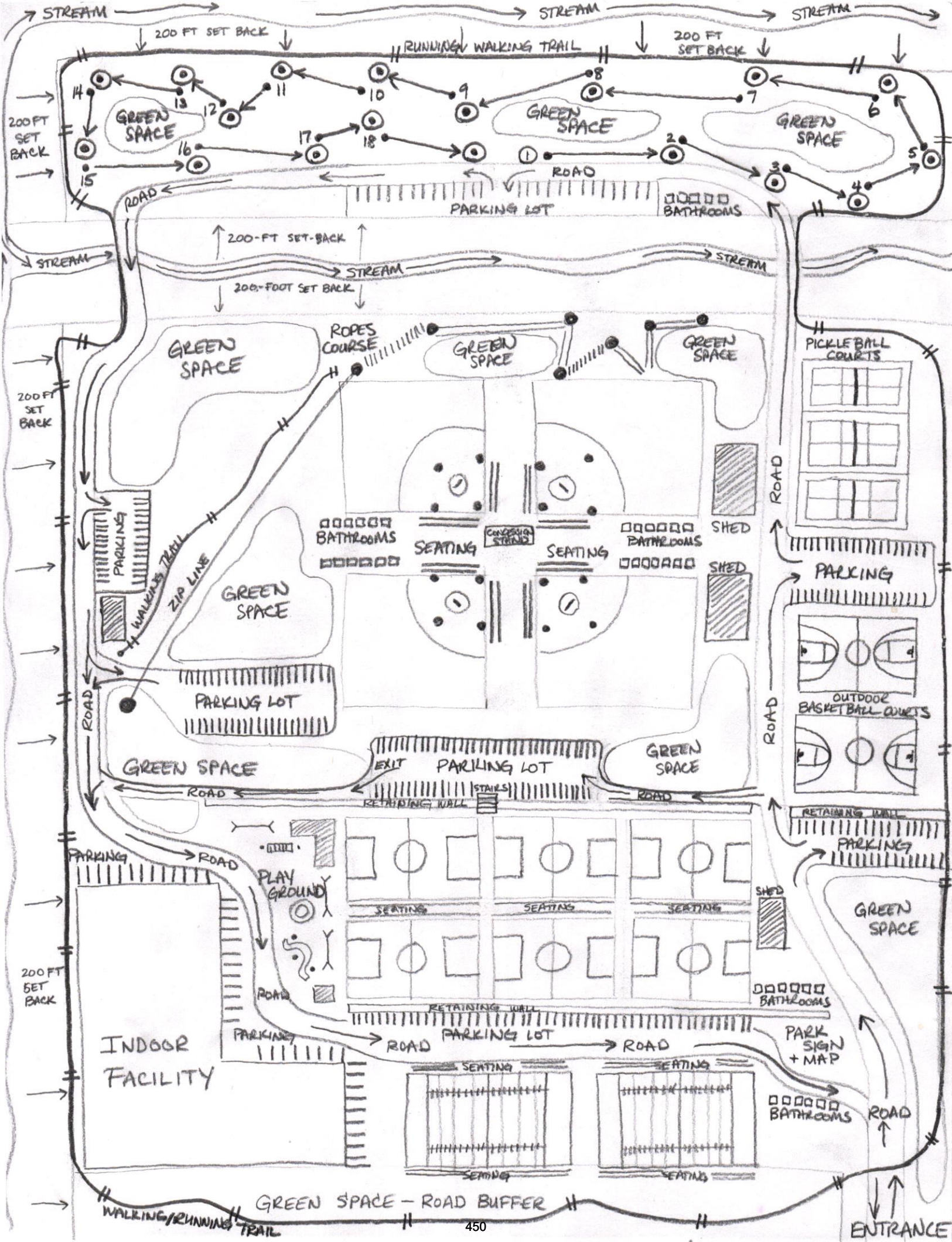
Please note that this airport provides a vital, multi function public service to the Kitsap County area:

1. A reliever for those rare times when the Bremerton airport might be closed ie. accident on runway etc.
2. Medical emergencies....even at one time a regular venue for transporting blood .
3. We are used by the military as a training site for practicing approaches and landings.
4. We have land available for siting more hangars adjacent to the airport....relieving the hangar shortage at the Bremerton National Airport.
5. A great rural type setting for those initial pilot trainies.

Thus I argue that the immediate area around Apex Airport should continue to be zoned light industrial and discourage any further residential development. I suggest you refer to the Airport Compatibility paper produced by WA DOT Aviation folks as support for your study.

Thank You,  
Ron Vandervort

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# CONCEPTUAL PLAN



## LEGEND

- 1 MAIN PEDESTRIAN WALKWAY
- 2 SNACK SHACK/SEATING AREA
- 3 RESTROOMS
- 4 CHILDREN'S PLAYGROUND
- 5 STORAGE BUILDINGS
- 6 PICNIC TABLES / FLEX AREA
- 7 LAWN GAMES  
IE. CORNHOLE  
BOCCE  
PING PONG

## TYPICAL SPORT FIELDS AND COURT SIZES

- LITTLE LEAGUE BASEBALL - 200' HOME PLATE TO FENCE
- JUNIOR/HIGH SCHOOL BASKETBALL - 56'x90'
- PICKLEBALL - 30' x 64'
- 9v9 SOCCER FIELD - 135' x 210'
- VOLLEYBALL - 48' x 78'



# Kingston Sports Complex -- Component size & dimensions

## Basic Field Dimensions

Basic Field Dimensions								43,560 = 1 acre		20 Acre Concepts			30 Acre Concepts			
	length in feet			width in feet			margin	Area (avg)		Qty	sq ft	acres	Qty	sq ft	acres	
	min	Typical	max	min	Typical	max		sq ft	acres							
Typical Soccer Fields		330	390		200	270		66,000	1.5	2	132,000	3.03	3	198,000	4.55	
Youth Soccer Fields		210			135			28,350	0.7							
Football Fields		320			160			51,200	1.2							
Basket Ball Court (High School)		84			50			4,200	0.1	4	16,800	0.39	4	16,800	0.39	
Pickle Ball Court		44			20			880	0.0							
Tennis Court		78			39			3,042	0.1							
		foul bases	Center Post	Field	Avg Arc		within avg arc: (FxFx3.14)/4		Ball Park "Square" with 10ft margins							
Softball fence line	50/60	200	225	212.5			35,448	0.8	55225	1.27	1	55,225	1.27	1	55,225	1.27
Pee Wee Baseball	80	260	300	280			61,544	1.4	96100	2.21	2	192,200	4.41	3	288,300	6.62
Baseball Fields.	90	300	400	350			96,163	2.2	168100	3.86						
BBall "4 plex"	60/80	20 ft margin		700			193,983	4.5	490000	11.25						
Beach VolleyBall		30		60		10		2,800	0.06	2	5,600	0.13	3	8,400	0.19	
Playground		35		45		10		2,475	0.06	2	4,950	0.11	2	4,950	0.11	
Indoor Bldg Facility		width		length				sq ft	acres							
160x200		160		200				32,000	0.7							
185 x 235 1 acre		185		235				43,475	1.0	1	43,475	1.00				
Chehalis style 250x260		250		260				65,000	1.5				1	65,000	1.49	
Concession/Restroom Bldg																
		75		90				6,750	0.15	1			2	13,500	0.31	
Parking area		cars	width		length											
1 spot		8	8.5	9	18			153	0.00							
2 rows 10 spots @ 75% + 21ft :		20	60		100			6,000	0.14							
4 rows of 40 + 2 ends		160	130		400			52,000	1.19	1	52,000	1.19				
4 rows of 60 + 2 ends		240	130		600			78,000	1.79				1	78,000	1.79	
Component Sub totals										16	502,250	11.53	20	728,175	16.72	
Lot Dimension with 50 ft buffer																
		840		1040							873,600	20.06				
		950		1350										1,282,500	29.44	

## Ingraham HS Fields

	length in feet			width in feet			Area (avg)	
Ball Fields and Parking	1950			625			1,218,750	28.0
Fields, Parking, Roads & Courts	1950			750			1,462,500	33.6
Turf (football/soccer)	375			220			82,500	1.9
Track/football/soccer	600			300			180,000	4.1
Track/fields/Stands/Food	600			400			240,000	5.5
Multi-Sport Field	540			400			216,000	5.0
Base Ball 1	375						110,391	2.5
Base Ball 2	225						39,741	0.9
2 SOCCER FIELDS	325			200			65,000	1.5
6 Tennis Courts & bleacher	325			125			40,625	0.9
Parking (aprox 140 spots)	400			140			56,000	1.3



## **ROTARY SPORTS & RECREATION SUMMIT MEETING – 9/15/23:**

We had 18-people attend and 8-different organizations represented (KYSA (Football, Baseball/Softball, Basketball, Soccer), NKSC (Soccer), NKLL (Baseball), KYLA (Lacrosse), KHS (Baseball/Softball), NKHS (Baseball/Softball), and PPR (Football, Baseball/Softball, Basketball, Soccer) – two RSVP'ed but didn't show (BIFC (soccer) and another member of NKSC (soccer)). Shortly after the meeting, we had 7-people representing 7-other organizations give input and answers to our questions.

We went for about 2.5+ hours chatting about five different topics:

1. today conditions, needs and issues
2. future outlook, concerns, needs and wants
3. equipment and other areas of insight, concerns, needs and wants
4. tournament focus and economics behind each organization, youth scholarship issues
5. general big picture insights and opportunity for them at provide feedback and questions

We recorded the meeting for our Rotary Club to revisit and make sure adequate notes were captured in the discussion... not intending to make it a public showing – unless it is requested of others to view.

Boiling down the answers from the meeting (plus what we have received so far from those who couldn't attend), here's some of our high-level observations (no particular order of importance):

\*A central location in North Kitsap with a number of amenities for various causes/organizations to utilize is very critical – our kids/parents are traveling far distances to do certain activities

\*Many kids are choosing to join other organizations outside Kitsap because we aren't providing adequate resources for their needs and skillsets

\*Select teams are hurting some sport enrollment numbers as kids leave the area/organization to join better offerings (facilities, equipment and opportunities to improve their skills)

\*Kitsap-area organizations can't do the select team route for certain sports due to a lack of field/court space

\*Safety is a growing concern now regarding playing surfaces/amenities – one major reason on why seeking outside of North Kitsap

\*Affordability for using space is a growing problem (examples: ~\$85/per player for basketball season, more than 3/4<sup>th</sup> of current annual budget going to field usage (practices or games)... not enough money to cover equipment needs for players/teams) – causing parents to fork out more money just to participate

\*Multiple turf fields – at least double of what have now – for year-round play is critical

\*Multiple lighted fields (combined with turf) is a big need for spring/fall seasons to expand field time usage

\*Not enough indoor court space to meet half of today's needs – this is also a growing issue for inadequacies of female sports (volleyball, basketball, cheer, gymnastics, etc.)

\*An indoor facility would open the door to allow more adult recreational needs – doesn't have to be all about sports... Centralia is a great example to follow

\*Too many teams sharing fields at one time (this year's soccer teams have three teams sharing one field to practice daily)

\*School fields represent more than 80% of current field availabilities – little to no maintenance happening now (school district has no money and little commitment to changing) and conditions continue to get worse as more use of fields require more maintenance

\*Parking at certain field/facility space is a growing issue (Strawberry Field as an example)

\*Who you know and priorities are being given to certain people/organizations over others for field space and time usage

\*COVID hindered ability to provide true growth metric of kids into sports programs but, the last two years, a consistent ~10%+ growth YOY is happening in just about every sport in NK (not the case for most girls teams)

\*Right now, doubling the number of available fields today (roughly 40-total – there are 25 (sort of) fields today) would solve today's needs and would help likely lessen the issues of future needs – especially if turf, indoor and lighted fields are built

\*Need to be mindful and work together on two newer projects – PERC and Tribe Field Projects – collaborate with, don't duplicate and fill gaps of what they aren't doing to improve NK's needs

\*Concerns and efforts regarding traffic mitigation and environmental issues are critical

We have already and will continue to reach out to those other sports/recreation organizations that weren't present to get their input as to what they are seeing.

These were the questions we asked (among some others depending on what each representative said and our follow-up to it):

**FIRST TOPIC FOCUS – TODAY ISSUES/NEEDS:**

\*What kind of conditions are you facing with fields and space usage today?

\*Where are you traveling to currently for practices? For games? For tournaments?

\*What are the total number of courts/fields your organization uses now? For practices per week vs. games each week? # of games per season?

\*How accessible are they? What do you go thru to obtain them?

\*What is the number of courts/fields you think need to handle today's needs vs. what you are settling with due to number of fields have access to now... is there a lack of fields?

\*Do you have any stories and/or pictures to share about the field conditions, the number of kids playing today or at least what use issues you are having right now?

\*What are the year-over-year numbers number of kids in your league/organization today? How does that compare to last year? In years past - Over the last 5-years? 10-years? Why has this changed the way it has? Explain...

\*Do you have more kids that want to play but can't because of certain problems/issues? What are those causes - number of coaches available?, number of fields available?, the finances of the family of the child trying to play?, something else?

\*What are the peak seasons (specific months) for your sport – start to finish?

\*In your opinion, is there a certain sport that's unfortunately behind the times and needs more support than another?

\*How many fields do you think we need today?

**SECOND TOPIC FOCUS – FUTURE ISSUES/NEEDS:**

\*What is your organization/sports' anticipated need in the future?

\*We talked about your “needs” assessments of today... what are your current “wants” assessments for tomorrow that you wish we had available to us today?

\*What do you think the greatest future need for sports and recreation infrastructure is for the Kingston-area? For North Kitsap as a whole? For Kitsap County as a whole? For the State of Washington? For outside the State?

\*What types of facilities would you and your family most likely use today for recreational use?

**THIRD TOPIC FOCUS – EQUIPMENT/OTHER ISSUES/NEEDS:**

\*Are there specific types of equipment, training tools and apparatus items that you would like to have access to or utilize on a regular basis? Any you don't have today that you need/want – why? Tell us more about what it is and why, where you'd get it and what the approximate costs are for these items...

\*What is the number of balls you need to have on hand per game? What kind of balls do you use and where do you order them from? Cost per ball?

\*What are the costs to hire referees and umpires today per game?

\*What's are your organization's costs: per field? per season? per league? per participant? Have those costs gone up over the years? If so, by how much each year?

\*What is the size of the courts/fields we need – for each age group?

\*What size balls (or other equipment) are needed for each age group today?

\*What are the peak seasons (specific months) for your sport – start to finish?

\*How are you storing equipment now vs. what is needed to adequately handle your organizations needs today/in the future?

**FOURTH TOPIC FOCUS – ECONOMIC GROWTH & TOURNAMENT ISSUES/NEEDS:**

\*Where do you go to play tournaments now?

\*How often do you play in tournaments per year?

\*How hard is it to sign up for tournaments today?

\*How many games would you need to conduct per season, per year or per weekend for a tournament?

\*How many teams for a tournament is ideal?

- \*How many teams are there in your league/our area (Kitsap County)? Versus our region? Our state? In the Nation?
- \*If we had space available, what kind of space would you need to warm-up pregame (if holding a tournament locally)?
- \*How many tournaments are available to participate in per year in our area currently? In our region? In our state? Outside of WA State? Who is hosting these tournaments?
- \*What does it cost to participate in those tournaments per team?

**FIFTH AND FINAL TOPIC:**

- \*What questions and or concerns do you have about a project of our scope that we're facing today?
- \*What other questions should we be asking today?
- \*Do you have any additional feedback for us at this time?

**Sports & Recreational Organizations:**

Boys & Girls Club of North Kitsap  
 Bainbridge Island Booster Club  
 Bainbridge Island Boys Lacrosse Association  
 Bainbridge Island Girls Lacrosse Association  
 Bainbridge Island Mountain Bike Club  
 Bainbridge Island Sportsman's Club  
 Bainbridge Island Youth Soccer Club (BIFC)  
 Bainbridge Island Swim Club  
 Chico Pee Wee League  
 Kitsap Aikido  
 Kitsap Alliance FC  
 Kitsap Athletic Roundtable  
 Kitsap Fliers Track & Field Club  
 Kitsap Ospreys  
 Kitsap Tennis & Athletic Center  
 Kitsap Youth Lacrosse Association  
 Kingston Booster Club  
 Kingston Kings (Select Baseball Team)  
 Kingston Pee Wee League  
 KYSA  
 Little League Baseball Inc  
 North Kitsap Booster Club  
 North Kitsap Lacrosse  
 North Kitsap (NK) Little League  
 Poulsbo Piranha Swim Team  
 Puget Sound Swim Club (PSSC)  
 Peninsula Football League  
 Olympic Peninsula Sports Union (Rugby)  
 Peninsula Hockey Booster Club  
 Silverdale Pee Wees  
 Special Olympics Washington  
 Sports Beyond  
 Tracyton Pee Wees Sports Association



## **RESULTS FROM COMMUNITY MEETING (6/27/23):**

Axe Throwing:	2	1.3%
Art & Theatre/Auditorium:	9	5.9%
Bowling Alley:	2	1.3%
Climbing Wall/Gym:	15	9.9%
Dog Park:	27	17.8%
Driving Range/Golf Simulator:	4	2.6%
Escape Room:	0	
Frisbee Golf:	12	7.9%
Go Carts:	2	1.3%
Indoor Track:	10	6.6%
Lawn Games:	8	5.3%
More Open Space/Woods/Trees/Trails:	15	9.9%
Outdoor Ice Rink:	12	7.9%
Outdoor Laser Tag:	1	0.6%
Sauna/Steam Room:	11	7.2%
Splash Pad/Park:	16	10.5%
Ropes Course/Zipline:	6	4.0%

**Total Surveyed: 152**

### **Community Feedback Survey Questionnaire (March-June 2023):**

*Rotary Kingston-North Kitsap is leading the efforts to create a multi-use complex in the greater Kingston area for sports and recreation for all ages.*

*There is a shortage of sports and recreation facilities throughout Kitsap County, but this is most acute in North Kitsap and, in particular, the greater Kingston area.*

*We envision this complex consisting of indoor and outdoor facilities, including turf fields for multiple sports, an indoor facility, and other sports and recreation options.*

*Our goal is to have a complex that can be used year-round and for a wide variety of activities and events (not just sports), for example birthday parties, family/community gatherings, team building/retreat activities, etc.*

*We expect to have some exciting announcements coming soon, but right now we are looking for community feedback on our proposed project.*

*This is a great opportunity to have your voice heard by our committee and our potential partners. Our goal is for this to be accessible and used by the whole community and your input is very important.*

### **Questions:**

- 1. What do you think is the greatest need for sports and recreation infrastructure in Kingston and/or North Kitsap?*
- 2. What types of facilities would you and/or your family be most likely to use?*
- 3. As Kingston and North Kitsap grow, what types of sports and recreation infrastructure do you envision for Kingston in...*
  - i. 5 years?*
  - ii. 10 years?*
  - iii. 20 years?*
- 4. What questions and/or concerns do you have about a project of this scope?*
- 5. Do you have any additional feedback for us?*

**FIELD ANALYSIS:**

<b>FIELDS:</b>	<b>NUMBER:</b>	<b>PLAYING SHAPE (1 (poor) to 5 (great)):</b>
Buck Lake Park	2 or 3 field space (soccer) + Playground Structure	2
	2-Beach Volleyball Court	
Gordon Elementary	1-Baseball + 1-field space	1
Breidablik Elementary	1-Baseball & Playground Structure	3
Indianola Orca Field	1-Baseball + 1 field space & Playground Structure	2
Kola Kola Park	1-Baseball + 1 field space	2
Kington Middle School	2-Baseball + 2 field space & Track, Football	1
Kingston High School	1-Baseball, 1-Softball & 1-Track, 1-Turf Football	2
	1-Outdoor Basketball, 2-Tennis/Pickleball Courts (Tennis/Turf/Track – 4 or 5)	
North Kitsap High School	4-Baseball/Softball + 3 field space & Track, Turf Football	4
	6-Tennis/Pickleball Courts	
Pearson Elementary	1-Baseball + 1 field space + Playground Structure	3
S'Klallam Tribe Fields	1-Baseball + 1 field space + Playground Structure	4
	1-Indoor Basketball Court	
Poulsbo Elementary	1-Baseball + 1 field space + Playground Structure	3
Poulsbo Middle School	3-Baseball + 2 field space & Track, Football	1
Snider Park (Little League)	6-Baseball (All Tournament Play Eligible)	4
Suquamish Elementary	1-Baseball plus field space (+1)	
Suquamish Community	1-Baseball + Outdoor Basketball Court	3
Strawberry Field	3 or 4 field space (soccer), 1-Turf Soccer/Football	3 or 4
Vinland Elementary	3 or 4 field space (soccer) + Playground Structure	3
Wofle Elementary	2 or 3 field space (soccer) + Playground Structure	2 or 3
Village Green Community	Playground, Half Indoor Basketball, 2-Tennis/Pickleball	4.5

\*\*\*\*25-fields available in baseball/softball but 4-are HS fields not suitable for youth. 6-game day fields.

**NKLL** - Spring 2023: Baseball/Softball: over 900-kids and 78-teams. 9% total, 37% girl increase over 2022.

**KYSA (2022):** 80 kids for football  
 72-kids for basketball (boys and girls) 9-teams  
 Cheer 30-kids

**KYSA BASKETBALL (2023):**

10-teams (select & recreation; 79-kids in total – some doing both) – 7-boys and 3-girls

**NKPW (2022):**

140-kids for football  
 60-kids basketball (7-teams)  
 Cheer 30-kids

**BIFC (SOCCER):**

Winter 2023 (Competitive League):

121 female players (8 teams)  
 210 male players (14 teams)  
 120 U-10 players in winter developmental league

Spring 2024 Rec - projecting 300 youth and 100+ adults.

**Fall 2023 (Recreational League):**

120 players with BI Park  
300+ with BIFC  
100+ adult with BIFC

**Fall 23 (select):**

360 competitive players.

**NK SOCCER CLUB:**

**Fall 2023:** 560-kids... 220-year-round select kids. 28-Boy Teams & 17-Girl Teams

**Winter 2023:** 126-Boys, 96-Girls (14-teams)

**PENINSULA FLAG FOOTBALL LEAGUE:** (From Russ Shiplet)

**Fall 2023:** 753-kids in total (40-teams) over 3-Conferences in Kitsap County (North Kitsap, Central Kitsap/South Kitsap) – each conference has between 200 and 300 kids.

**Winter/Spring of 2024:** Will have 4-Conferences in North Mason and Kitsap County (North Kitsap, Central Kitsap, South Kitsap and North Mason) – each conference has between 200 and 300 kids. (~1,000 total kids)

**Summer 2023:** 320 kids (24-teams)

**Spring 2023:** 255 kids (19-teams)

**Winter 2022/2023:** 305 kids (22-teams)

**CHEER:**

Carolyn Slade (NKMS & NKHS) – 17-NKMS kids, 27-NKHS kids try-out, 24-participating (2023)

Laramie Amezquita (KHS) Cheer Coach – Carol Armstrong (KYSA) Cheer Coach –

2021 (First Year) – 12-kids

2022: 26-kids

2023: Prep Squad (ages 5-8): 16, Senior Squad (ages 9-13): 26

Future Goal: 3-Squads (Mini (ages 5-6) max: 15, Prep (ages 7-9) max: 20, Senior (ages 10-14) max: 30

**Facilities Costs:**

Schools always have first right even if you have reservations. Practice can go from 2:30-whenever for schools.

NKHS Stadium w/o lights: \$67.73 per hour

W/ lights - \$33.50 more per hour

KHS w/o lights: \$46.20 per hour

W/ lights: \$33.50 more per hour

NKHS/KHS Main Gym: \$26.72 per hour

PMS/KMS Main Gym: \$20.79 per hour

NKHS/MS AUX Gyms/Elementary Gyms: \$20.79 per hour

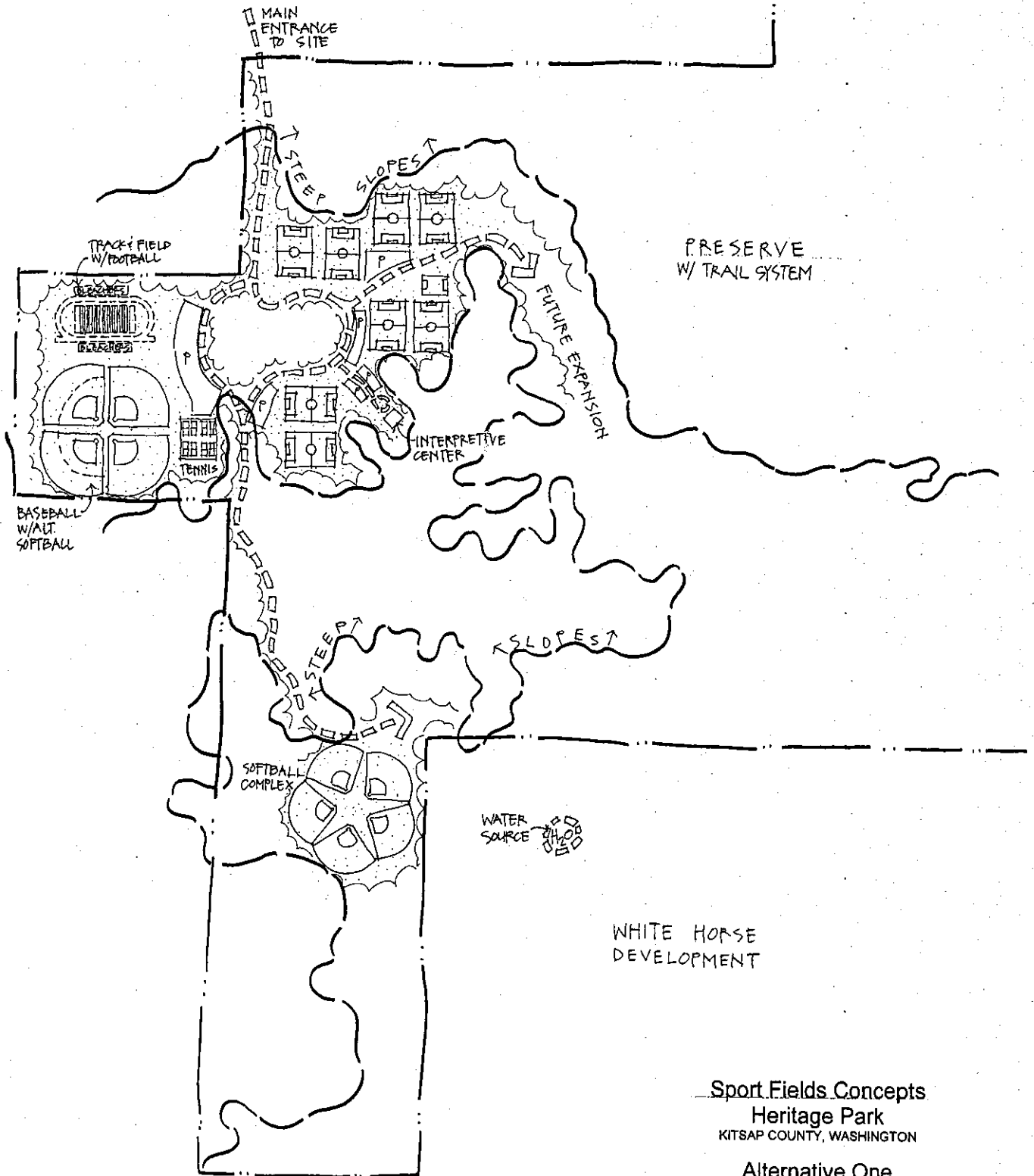
Strawberry Field Turf: \$46.20 per hour. W/lights: \$33.50 more per hour

Outdoor grass field usage: 4-hours for \$53.13

Outside of normal staffing hours, custodian needs to be hired to be there: \$47.25 per hour, 2-hour minimum

These prices are scheduled for a 10% increase for 2023-2024 year.

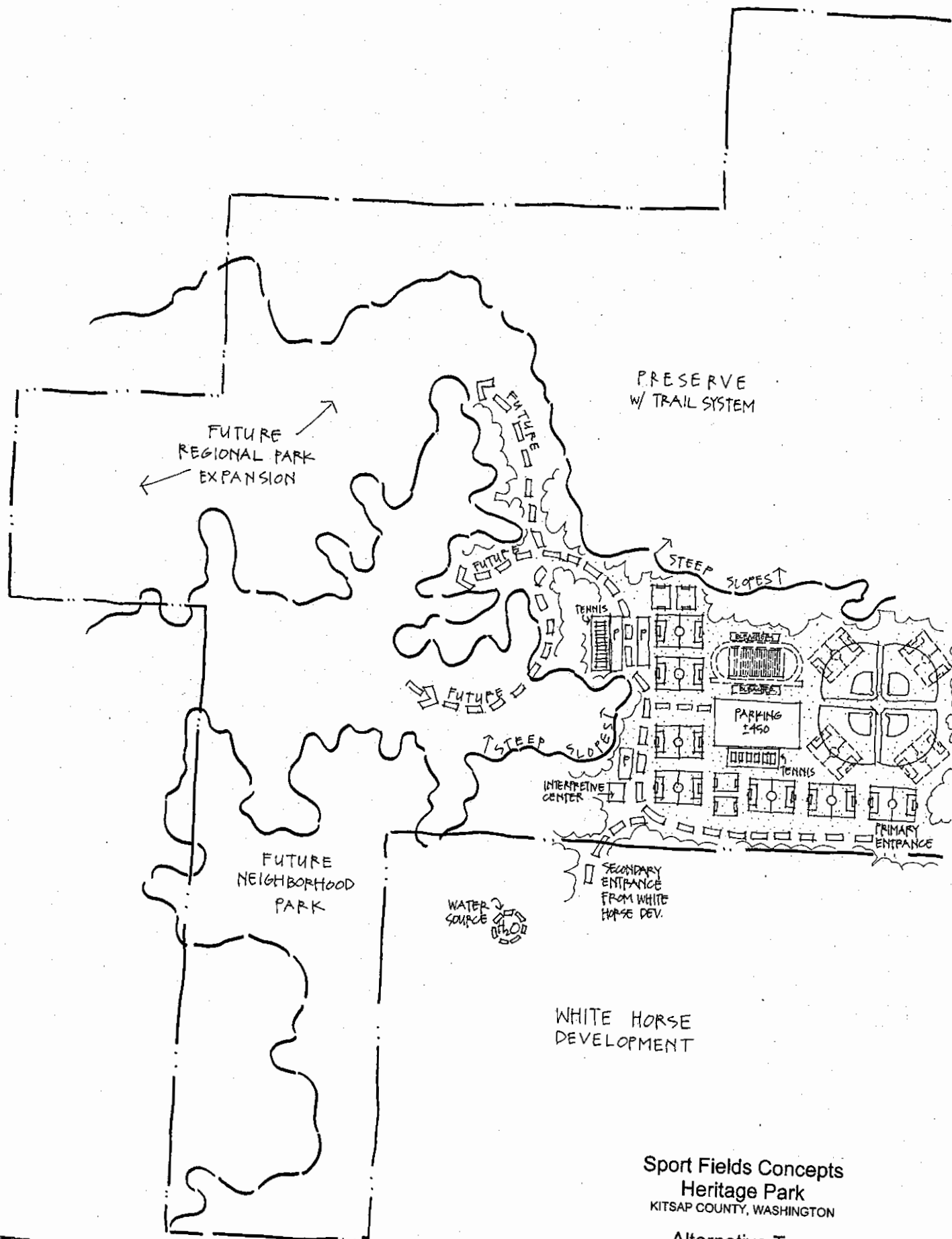
Heritage Park  
 By Sarah Post. 5/03



Sport Fields Concepts  
 Heritage Park  
 KITSAP COUNTY, WASHINGTON  
 Alternative One

ascade  
 align  
 collaborative  
 urban design | landscape architecture  
 community planning | environmental design





## North Kitsap Sports and Recreation Complex is Common Sense

Benjamin Franklin is regarded as a wise American. When Ben faced a tough choice, he would pull out a piece of paper and draw a line down the middle. On the left side of the line, he would write a list reasons that favored the decision. On the right side, reasons that did not. He then compared the left side against the right side and made a choice, usually the side with the most reasons. This became known as the Ben Franklin Balance Sheet.

Another smart American is Thomas Paine. Paine wrote a famous collection of articles in 1776 called “Common Sense.” Paine’s papers led skeptics and doubters in America to believe independence from Britain was possible. Today we celebrate Common Sense on July 4th every year.

Ben and Thomas would be helpful in North Kitsap and at County offices these days, as decisions are made about a proposed sports and recreation complex, centrally-located at Bond Road NE and Stottlemeyer Road NE. It is called North Kitsap United (NKU).

Here is the common sense piece. First, there is a public company, Raydient Places and Property, that owns 400+-acres at that site. If Raydient’s application is approved to rezone the property from 20 twenty-acre parcels to 80 five-acre parcels, Raydient proposes to gift 200+/- acres to the community for construction of an all-ages sports and recreation campus, and outdoor recreation of other sorts, like hiking, mountain-biking and other “passive” activities. Furthermore, the YMCA of Pierce and Kitsap Counties, based on its 2023 studies, has deemed this site, to be near-perfect for a full-scale, multi-use facility, with swimming pool and other “Y” amenities, similar to the Haselwood Y in Silverdale. Finally, there is the time and talent of Kingston North Kitsap Rotarians, a vital force of volunteers committed to do the work necessary behind the scenes to see the project to completion. Side note: these are many of the same folks who made the Village Green Community Center a reality. So, big picture. Raydient is willing to gift 200-acres at a centrally-located site in North Kitsap. The YMCA is willing to build a full-scale facility at the site. Rotarians are an experienced force of volunteers willing to give their time and money to get this done. It’s just common sense.

Back to Ben and his balance sheet. Since last June, when the idea of a centrally-located sports and recreation campus was proposed, local activists have loudly, and many times wrongly, weighed in on social media and websites seeking to fill the right side of Ole Ben’s sheet with reasons not favoring NK United. Most of these “unfavorables” have been addressed as either false (cannot build this facility, except in a UGA); not scaleable to projected need (fix the fields we have today, which are mostly controlled by the school district for school district activities); how to trust that Raydient will follow through (they will agree to conditions of approval as part of the rezoning); or environmental (a David Evans & Associates study on the NKU website details how all environment concerns are either not of concern [wetlands] or can be addressed with modern day technology [waste management].)

The list of reasons that favor this proposal is lengthy, starting with common sense: no-cost property, YMCA, and volunteer force. Centrally-located soccer, baseball and softball fields, basketball and volleyball courts, playable in most weather conditions and scaled to meet future need. Pickleball courts, disc golf course, dog park,

community garden. Adjacency to other outdoor activities at Port Gamble Forest Heritage Park. Health and mental health benefits associated with active recreation and YMCA programs. No other organization is proposing to build such a complex. The list favoring this idea goes on and on. Ben would not have a difficult choice. Please go to: [www.northkitsapunited.com](http://www.northkitsapunited.com), to review the environmental study and a “white paper” on the project. Further, to get a sense of all the good a YMCA at this site can bring, go to the Haselwood Family YMCA website, [www.ymcapkc.org](http://www.ymcapkc.org).

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## **Paul Dutky's April 8, 2024 Comp Plan Meeting Testimony**

Thank you Commissioners for this opportunity to speak with you today. I am Paul Dutky, member of West Sound Cycling Club for over 30 years, and the current bike advocacy chair. I live in District 3, and am intimately familiar with Kitsap County roads.

There are too many obvious flaws in this transportation element of the Comp Plan to enumerate. The underlying problem is there is little or no oversight of Public Works, and therefore that department lacks accountability. This has grown completely out of hand. The car-centric bias is evident, as is the lack of bike facilities on the County's prioritized twenty designated bike routes. Elected officials need a way to monitor implementation of the goals and objectives in County planning documents so they can exercise due diligence as the oversight entity of County Departments. Some suggestions vetted by the West Sound Cycling Club for improving planning documents are included in the version of this testimony I have submitted.

The public is SUPPOSED to be able to weigh in on transportation planning. This is only possible if the public can identify projects that are of concern to them and that it is possible to understand the descriptions of the proposed projects. If the public cannot determine the content or extent of a Transportation Improvement Proposal or a Comp Plan project, they cannot contribute an informed opinion. Neither can you. This must be corrected. No Comp Plan *public* process should be considered valid if it is not. This draft transportation element of the Comp Plan is incoherent. It is not a useful or serious document.



## Recommendations:

- State the WSDOT-defined type of bike facility, length and location in project descriptions, or an accompanying reference document. Bike facilities are not intermittent over the span of a several mile project - they are continuous with a beginning and an end.
- Separate bike projects from other road projects that could compromise the bike element or eliminate it if project descriptions are vague.
- Tag non-motorized projects with their own “improvement type” code so they can, collectively, be tracked regarding implementation, even when the bike facility project is part of vehicular road improvements.
- Bike/pedestrian enhancements should be reviewed by a Complete Streets Committee or other committee who would view the project principally from a pedestrian and bicyclist perspective. This should eliminate absurd or completely infeasible projects - like those that seem to dominate current comp plan project lists.
- Bike facilities should extend for reasonable distances and create connectivity to other bike facilities. The County primarily builds “opportunity projects” by adding a paved shoulder wherever a road project occurs. Public Works calls this incrementally building the bike network. However, opportunity projects break any improvement for cyclists into short disconnected segments, which is contrary to stated policy. An “opportunity project” is not a bike facility prioritized in the Comp plan. “Opportunity Projects” should be defined out of existence. They are “car” improvements, not “bike” improvements.

- The KRCC 2010 document has the following quote on page 100: “In 2001, Kitsap County Public Works Department (DPW) published its Bicycle Facilities Plan with a project prioritizing system ~ the Priority Array defined **High, Medium, Low and Opportunity Projects**, but it proved difficult in implementation. Quite simply, the High Priority Projects were not being implemented; more Low and Opportunity projects were being constructed as the Department of Public Works programmed various construction and re-construction projects through the Transportation Improvement Program.” This continues to be true in 2024.
- The Comp Plan should list non-motorized projects that NEED safety improvements. Adding a multi use path to the part of Hansville road that already has 5 to 7 foot paved shoulders makes no sense, and would never be funded. We should not spend our limited non-motorized funds on roads with acceptable bike safety when other higher priority projects lack it. There should be social and geographic equity in prioritizing projects.
- The addition of a north-south bike facility should be added to the Comp Plan and given highest priority. We strongly advocate that funds to be allocated for its design by a firm that specializes in such projects.
- Projects vaguely described in few words in Comp Plan documents should have an associated more detailed description available, so it is clear where left turn lanes are planned, where and how lane alignments will be built, what access management means, and how these road centric projects will interface with the proposed bike facility. This would better define these projects, and give some understanding of their feasibility.

- No project should be proposed if it is not considered feasible. If it is considered feasible and desirable and it is on the Six-year TIP, there should be evidence that a grant was applied for.
- Maps of Comp Plan projects should be made into expandable PDFs allowing for much greater resolution, and include street names to orient those using the document. Vagueness and numerous inconsistencies makes the maps and descriptions supplied in this comp planning process nearly undecipherable.
- If a number of alternative plans are presented, the reason for creating them should be clearly stated.
- No Comp Plan public process should be considered valid if it is incomprehensible. We can do better.
- Other recommendations relate to how the county uses its 6-year TIP process, and the need to revise its Non-Motorized Plan if the County is to improve its record regarding implementing plans in its policy documents. A document explaining these problems and possible solutions was submitted to the Planning Commission last month.

Paul Dutky

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# CHARTWELL LAND COMPANY

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Dear Kitsap County Board of Commissioners,

I am writing to you as a representative of Meadow View Kitsap LLC which has submitted reclassification request #13. The property is currently zoned Rural Residential and has requested to be brought into the Urban Growth Area and rezoned Urban Low.

## **Reclamation and Restoration**

In 2019 we submitted a comprehensive plan amendment, requesting conversion of the former Dickey Sand and Gravel Mine from Industrial zoning to Urban Low and Neighborhood Commercial. Through that process we committed to integrate affordable housing into the project. Through a robust Public/Private collaboration, we committed to developing 10% of the total project yield as affordable housing (per HUD standards). Some of the key concepts in this commitment are as follows: 10% of the total project as affordable, 10% of every phase as affordable, affordable units intermixed in the community (not isolated), max square footage of 1800 sqft for the affordable units, 100% paid by the developer with no subsidies. This unique approach has allowed us to find the nexus of affordable housing and market rate housing. Through the rezone incentive, we were able to modify our product mix to bring privately funded affordable housing to the market. Here we are 5 years later, and we now have a fully approved community of 765 residential units with 76 of them being affordable units. We will be breaking ground on the land development in the coming weeks. A 140-acre abandoned gravel mine, will now be repurposed into a great neighborhood. This amazing story would have never been possible if it weren't for the collaboration with the Board and the use of a rezone process to incentivize affordable housing.

## **Collaboration 2.0**

We now have another opportunity to collaborate through the comprehensive plan process. Through this process, we propose creating affordable housing, missing middle housing, reclamation of Barker Creek, and utilizing Transfer of Development Rights (TDRs). Although site specific conditions are not common in a general comprehensive plan update, they are allowed. If this opportunity is delayed to a potential site-specific process in the future then it is unlikely to successfully move forward. We believe this is an uncommon opportunity that should be thoroughly considered.





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## **Affordable Housing**

We blazed a trail with the Dickey Pit collaboration and suggest we utilize many of the same concepts. A summary of those concepts are as follows:

1. 10% of the total unit count shall be reserved for affordable housing as defined by the Department of Housing and Urban Development (HUD).
2. 10% of every phase shall be reserved for affordable housing.
3. Affordable housing can be for sale to a qualified buyer (similar to the Housing Kitsap Self Help program) or provided as rental units.
4. For-sale affordable units shall be no larger than 1800 square feet. This is to ensure once the unit has been sold to a qualified buyer, it still remains missing middle product for years to come.
5. For-rent product shall meet the affordability requirements for a minimum of 10 years.

## **Missing Middle Housing**

In addition to the affordability requirement, we recommend a requirement for an additional 10% of the total unit count to be Missing Middle Housing. This includes townhouses, single family attached, duplexes, multifamily, cottage housing, and single family detached less than 1800 square feet.

## **Barker Creek Restoration**

The current site is part of the former Island Lake Bible Camp. Throughout the many decades of the camp history, there were countless changes to the site. Many of these changes created unintentional impacts to the headwaters of Barker Creek, which traverses the site North to South approximately 2400 feet. Some of the impacts are as follows: approximately 500' of the stream is piped, there are numerous stream crossings with substandard culverts, and much of the buffers have been reduced or completely removed. Through this rezone process, we recommend the project be conditioned to restore the portion of the Barker Creek corridor that runs through the property.

## **Transfer of Development Rights**

The last recommendation we suggest be part of this process would be a transfer of development rights. We recommend that a TDR certificate be required for every unit not designated as Missing Middle or



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Affordable housing (80% of the total units). This will offset the change in the Rural/Urban by extinguishing building rights in the Rural area.

In summary, it is our hope that the Board of County Commissioners will include this 75 acre site in the Preferred Alternative, subject to the conditions outlined in this letter.

Thank you for your consideration,

 4-8-24

Levi Holmes  
Founder  
Chartwell Land Company



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## April Ryan Comments for BOCC Public Hearing 4-8-24

Good evening. I'm April Ryan from Kingston, and I appreciate this opportunity to participate in planning our future together. I'm also a co-chair of the Kitsap Environmental Coalition Steering Committee. However, tonight, I'm speaking for myself about the important step the County has made in adding Climate Change to the Comprehensive Plan.

While this is a commendable first step, this new chapter needs to be strengthened. Despite claiming a '*proactive*' approach to climate change, the chapter's language, goals, and strategies lack conviction. It uses words like '*consider*' (at least 10 times) instead of the more actionable terms used elsewhere in the Comp Plan.

Moreover, the rationale for including this new section is written as though it is only legislatively mandated—as if, "*Yes, we'll comply because it's the law, not because we understand it is vital to our survival.*"

We, the citizens, *need* our leaders to have the *conviction* to build and implement a **Climate Action Plan** that we can all work together to achieve — most basically:

1. **Mitigation** - reduce GHG emissions & reduce over-consumption
2. **Adaptation** - restore resiliency to change by increasing diversity
3. **Community Engagement** through leadership and education

It is more complicated than that, but starting with the Comp Plan as drafted, I have submitted more detailed suggestions for strengthening the language and adding goals. I also strongly support *moving* the Climate Change chapter to the *front* of the Comp Plan, where it can *inform a consolidated framework*.

Thank you very much!

April Ryan

.....

Here are a few suggestions (red is new/change) for strengthening the **Climate Change Chapter**:

### **Vision** (p 142)

County services, local economy, communities, and natural resources and systems are resilient to a changing climate and County greenhouse gas emissions are reduced. ~~consistent with regional goals.~~ **Have the vision and intent to *mitigate* the effects of climate warming and to *limit* the local contribution to greenhouse gases driving these changes.**

---

### **Intent** (p 142)

The intent of this chapter is to provide a consolidated policy framework ~~related to climate issues that is essential to facilitating planning for our county and to assist in meeting the planning goals of the Growth Management Act.~~ **that supports establishing land use and development regulatory mechanisms that implement climate resilience.** *(more intentional and explicit, less soft waffling and leaning on policy)*

**Define Climate Change in real (not abstract) terms:** The climate is warming rapidly, and greenhouse gases are contributing to this change, resulting in:

- a. Increased extreme heat events.
  - b. High wind events.
  - c. More frequent and extended summer droughts.
  - d. More intense rainfall events with increased risk of stream flooding and erosion.
  - e. Power outages and brown-outs.
  - f. Increased risk of wildfires and wildfire smoke.
  - g. Shoreline flooding and erosion.
  - h. Changes in flora and fauna in response to these climate changes.
- 

#### **Kitsap County Climate Change Resiliency Assessment, 2020 (p144)**

The assessment is based on the best available science at the time and ~~considers~~ **recognizes** the probability of a wide range of impacts...wildfires.

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**Climate Change Goal 3. Economy (p 152)** (Add, also applies to supporting sustainable Economic development.)

**Climate Change Strategy 3.4.** Develop, implement, and periodically update the Shoreline Master Program and coastal resiliency plans to mitigate and adapt to climate change impacts. Do not develop in areas at risk for sea level rise & flooding.

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#### **Climate Change Goal 6. Public Infrastructure and Transportation Network (p153)**

**Climate Change Policy 6.3.** ~~Consider~~ **Implement** stormwater utility improvements to accommodate increased conveyance during extreme rain events and coastal flooding.

---

(Add the following:)

**Climate Change Policy 6.6.** Encourage and incentivize using more efficient appliances, heat pumps, and roof-top solar to reduce the demand on the power transmission grid.

**Climate Change Policy 6.7.** Enhance the safety of power transmission grid to avoid brown-outs, outages, failure from wildfire and danger of wildfire ignition.

**Climate Change Policy 6.8.** Create a bicycle/pedestrian transportation network plan on existing roadways to encourage the use of non-motorized transportation to reduce vehicle miles driven.

---

#### **Climate Change Goal 7. Resiliency Through Land Use (p 155)**

**Climate Change Policy 7.3.** ~~Consider~~ **Prevent or mitigate** environmental justice impacts to overburdened communities when considering new land use designations and rezoning actions.



### **Climate Change Goal 8. Protect and enhance forests**

Climate Change Policy 8.1. ~~Consider~~ **Design** an urban forest master plan and applicable development regulations to maintain and expand tree canopy cover, improve watershed health, prioritize carbon sequestration, and build climate resilience.

**Climate Change Strategy 8.b.** Provide vegetation guidance to promote the planting of species that are resilient to climate change. **Recommend planting seed stock of indigenous species that are more resilient to climate warming.**

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### **Climate Change Goal 9. Hydrology and Hydrogeology (p156)**

Climate Change Policy 9.1. Prioritize green infrastructure and low-impact development techniques, where appropriate, to address increased storm events, stormwater runoff, and local ocean ~~acidification~~ **seawater oxygen depletion** due to nutrient loading from runoff. **Ocean acidification is a world-wide effect of increasing CO2. Excess nutrients in runoff causes algal blooms and oxygen depletion when the algae die and decay.**

**Climate Change Strategy 9.b.** Provide guidance to promote the use of smart irrigation, stormwater nutrient management, preventative maintenance, water conservation and wastewater reuse, plant selection, and landscape management. **Encourage the creation of farm plans through the conservation district to achieve these goals.**

**Climate Change Strategy 9.4 (p158)** **Reevaluate the County's policy and practices around vesting projects since vesting ties a project to outdated regulations that do not consider the importance of climate change efforts now beginning to be recognized and implemented.**  
*(Let Arborwood be a lesson learned, we can not afford to continue making irresponsible environmental mistakes.)*

**Climate Change Policy 11.3. (p159)** ~~Consider~~ **Ameliorate** climate change impacts including sea level rise, extreme precipitation, increased streamflow, and other impacts in floodplain management planning.

**Climate Change Policy 11.6. (p160)** ~~Consider~~ **Mitigate for** sea-level rise in coastal and nearshore habitat restoration projects.

**Climate Change Strategy 11.b.** Maintain and update a critical areas ordinance that incorporates climate change ~~considerations~~ **strategies.**

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### **Climate Change Goal 13. Emissions Reduction (p162)**

**Climate Change Strategy 13.b – Work with GPC and other organizations and stakeholders to identify appropriate forest lands to be secured by the County or other partners as Community Forest Lands and managed to maintain their carbon sequestration properties.**

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### **Climate Change Goal 14. Building Decarbonization (p164)**

Climate Change Strategy 14.c. Explore funding and collaboration with community partners on incentives connecting homeowners and renters to energy efficiency opportunities (e.g., appliances, weatherization, **solar panels, heat pumps, tankless water heaters, using appliances during non-peak times**).

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**Climate Change Goal 16. Park and Open Space Tree Canopy (p165)**

Manage tree canopy ~~within park and open space areas~~ to sequester carbon, **clean and cool the air, retain water, build soil, and provide vital habitat for the entire food chain.**

*(Encourage/incentivize retention and increase of tree canopy EVERYWHERE, not just in parks. Trees must be universally valued across urban, suburban, and rural areas, whether public or private land. Trees are not decorative; they are essential for our environmental health and the restoration of ecological balance in our region. If adopted worldwide, we would not be at this climate crisis point.)*

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**Climate Change Goal 19. Solid Waste and Wastewater Emissions Reduction (p166)**

**Climate Change Policy 19.1.a. Educate the public about reducing waste and adopting conservation measures to benefit themselves and their communities.**

Climate Change Policy 19.3. ~~Consider~~ **Facilitate** methods to deal with solid waste locally, thereby reducing emissions associated with transportation to out-of-state landfill facilities.

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I'm Dianne Iverson, a retired public employee and resident of Bremerton. I live in Kitsap County Commissioner district 3.

Thank you Commissioners for the opportunity to speak to you about the Kitsap County Comprehensive Plan. I am here today to talk specifically about transportation, an issue all of us can agree is extremely important to our quality of life. The Kitsap County Comprehensive Plan states: **Create a contiguous non-motorized transportation system which integrates on and off road facilities.** Yes, I agree with this overarching vision! But a vision isn't worth the paper it is written on if it doesn't lead to implementation. Our peninsula is currently unsafe for cycling. I personally want to make it safer for all of us, whether we walk, bike, or roll.

In 2019 I was bicycling north on Clear Creek Road, County bike route #27, when the driver of a pickup truck driving in the opposite direction turned left directly in front of me as I was crossing an intersection. I was knocked unconscious, had multiple facial lacerations, and suffered post concussive symptoms for 6 months.

In your DRAFT Comprehensive Plan, Clear Creek Road, project #214, calls for either 6.5 or 7.5 miles of sidewalk on this rural road with a 50mph speed limit and few pedestrians users. The estimated cost is over 21 million dollars. There is no question that **paved shoulders** on this important north-south bike route would significantly improve safety for both cyclists and pedestrians, and cost far less than sidewalks.



I cannot recommend any of the three Appendix C alternatives. Project descriptions are too vague to judge whether they would improve road safety. Experience has taught me that most of the vague bike facility improvements the County proposes are not constructed, so I cannot accept vagueness.

How do we improve safety for cyclists and pedestrians?

1. Adopt WSDOT's precise definition of bike facilities, which exclude 4-foot paved shoulders.
2. Prioritize feasible non-motorized improvements on the County's numbered bike routes, specifically those connecting Pierce County to the Hood Canal Bridge. This would create geographic equity and complement North Kitsap's planned east-west STO path.
3. Prioritize funding the Jarstad Park to Kitsap Lake paved shared use path.
4. Contract with an engineering firm specializing in bike pedestrian improvements to create the next Kitsap County Non-motorized Plan.
5. Re-define the TIPS process: **Separate** resources into road improvements, on-road bike/ped safety improvements, and off-road paved shared use paths.

Let's improve the safety of our transportation system for pedestrians, cyclists, and individuals who use wheelchairs by implementing the County's clear policy vision.

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April 8, 2024

Dear Planning Commissioners,

I would like to add my voice in requesting the Dee-Enetai Creek area (aka: the Fisher Plat, Cheney Estate -Enetai Community) designation be reconsidered and the allowable development density be reduced. This area would ideally re-zoned to Greenbelt and designated a “Wildlife Forest Patch” as per the Draft recommendation in the 2016 Kitsap County Comprehensive Plan.

The Greenbelt designation, or at least a greatly reduced density designation, is supported by the following:

1. Vision 2050's Regional plan states that urban infill is supported but that critical unique wildlife and environmental issues must not be overlooked such as those in the Dee-Creek/Fisher Plat area.
2. Kitsap County's 2024 Comprehensive Planning Commission has recommended Alternative 2 as it meets the Commerce Housing targets and exceeds the CPP population targets. However, this recommendation meets the business/financial needs but seems to fail when it comes to considering the needs of the community and the environment. These are also aspect which are detailed in both Kitsap County's and the Region's goals (Vision 2050).
3. The 2023 Kitsap Countywide Population Policies (CPPs) were updated following Kitsap Regional Coordination Councils planning framework to align with Vision 2050. These updates call for addressing impacts on water, land and health, not just infrastructure and economy. Kitsap's CPPs include coordinating watershed and land use, creating regional networks of open space by preserving/enhancing open space linkages and wildlife habitat, and protecting air/water quality. The CPPs also say that they “support maintaining distinct urban identities with open space and natural features”.
4. This area has been designated Area 15 – watershed by Kitsap County. It seems logical the the more pristine the land, the better the Watershed will be.

Thank you for your consideration regarding re-zone of this unique beautiful community jewel!

Judy McDonald

360-801-4095

Bremerton, WA

[Return to Comment Matrix](#)



## Skokomish Indian Tribe

Tribal Center (360) 426-4232

N. 80 Tribal Center Road

FAX (360) 877-5943

Skokomish Nation, WA 98584

April 8, 2024

Kitsap County Commissioners

614 Division St. MS-4

Port Orchard, WA 98366

Emailed request to: [kitsapcommissioners@kitsap.gov](mailto:kitsapcommissioners@kitsap.gov); [compplan@kitsap.gov](mailto:compplan@kitsap.gov)

**Re: Kitsap County Comprehensive Plan Update – Additional Information to Support Reclassification & Urban Growth Area Designation for Skokomish Indian Tribe Properties**

Dear Kitsap County Commissioners,

The Skokomish Tribe urges Kitsap County Commissioners to reconsider the staff recommendation to the Planning Commission with regard to subject properties owned by the Skokomish Tribe, shown below.



The staff recommendation rejects the Tribe's request for a rezone of said parcels from "Rural Reserve" to "Commercial." The parcels front onto SR 3, adjacent to planned growth within the Puget Sound Industrial Center, the City of Bremerton Urban Growth Area, and the Port of Bremerton. For your consideration, and in recognition of Growth Management Act criteria, Countywide Planning Policies and regional PSIC goals, the Tribe offers the following:

### 1. Land use compatibility



- Subject parcels are located at the node where the existing SR 3 mainline will divert to become the SR 3 Freight Corridor, with a WDSOT-approved roundabout intersection serving both to provide access to the parcels but also as a key element of future regional travel.
- Adjacent parcels, also north of SR 3 and currently zoned Rural Reserve, are proposed for Industrial zoning with the Comprehensive Plan Update, as recommended by staff and Planning Commission. Although this adjacent area is zoned Rural Reserve, it is actively being used for industrial type purposes (see inset photo). Rezoning of the subject properties and inclusion with the Urban Growth Area would be compatible with the future adjacent industrial zone and would create a more cohesive boundary for the amended UGA.
- The subject parcels are contiguous to the UGA and the PSIC in the current Comp Plan.
- Commercial properties are a compatible transition from industrial, especially when occurring at junction of significant planned infrastructure improvements, which will in themselves change the nature of the current Rural Reserve designation.
- Commercial designation supports job creation and is less intensive than multi-family or high density residential.
- Commercial designation is compatible with Port planned development, traffic patterns, and economic benefit.



## 2. Planned urban growth in the immediate and adjacent area

- The Port of Bremerton plans for increased development in support of job creation – the Port properties are adjacent to SR 3 in the vicinity of the Tribe’s subject parcels, meaning urban development will occur effectively adjacent to these parcels.
- A racetrack is planned for the Industrial zone within the PSIC/Port District adjacent to the subject parcels, bringing other complimentary commercial activities to the subject area.

## 3. Planned infrastructure investment and expansion

- The City of Bremerton is currently preparing a Feasibility Study to assess wastewater demand and treatment capacity at the Port of Bremerton’s Olympic View Business Park. There is intent to build additional infrastructure to support increased demand resulting from the development of PSIC.
- Mason County has funded the design of extending sewer to Lake Flora Rd, near the border of the subject parcels, anticipating growth of the immediate areas.
- WSDOT has granted the Tribe an access break and approved a roundabout intersection at this location, in conjunction with the SR 3 Freight Corridor in recognition of the pending commercial project.
- Immediately in front of the subject parcels, there will be access to all urban services, including roads, water, and sewer. Forcing the properties to stay in Rural Reserve is out of alignment with the planned and funded improvements already coming to this area.

**4. Job creation**

- Consistent with focus on building employment within this part of the County, the planned development at these locations will directly generate more than 600 permanent full time jobs at the properties, with an estimated indirect generation of 260 jobs at other businesses throughout the County from the wages and spending induced by future uses within the site. In addition, more than 950 construction jobs are anticipated during project development.

**5. Environmental Protection**

- The Tribe has protected these lands within their usual and accustomed areas since time immemorial and takes the role of stewardship very seriously.
- Wetlands on the property are being protected resulting in preservation of nearly 1/3 the total acreage, meaning the "Rural Protection" intent of the parcel stays intact while developable areas are pushed toward the existing highway and existing infrastructure availability.
- The ability to hook up to urban services via the UGA service area designation will allow for managing a greater portion of the property in a minimally impacted condition.
- A NEPA EA has been prepared for each subject parcel. The Tribe has received a Finding of No Significant Impact (FONSI) for trust status and development of the first parcel, and anticipates a FONSI for the larger parcel in Q3 2024.

**6. Jurisdictional Support/Awareness**

Through meetings and opportunities for consultation and review of NEPA, the Tribe has actively worked with the following agencies:

- WSDOT – approved access break and intersection PFA
- City of Bremerton – Presentations to staff and elected officials
- Port of Bremerton – Presentations to staff and elected officials

We appreciate the County's careful consideration of the Skokomish Tribe's request for redesignation of the subject properties for commercial development and inclusion within the Urban Growth Area as may be necessary to allow for municipal utilities to serve the properties. Please do not hesitate to contact us should you require additional information. We have designated Earle Lees (Skokomish Tribal Attorney) as the point of contact and his cell number is 360.490.8959 and email is [elees@skokomish.org](mailto:elees@skokomish.org).

Very Truly Yours,

  
Charles Miller, Chairman  
Skokomish Tribal Council



# Skokomish Site Intersection Control Evaluation

SR 3 MP 29.08 to MP 29.26

November 2021

Region Traffic Engineer Approval:

*Sarah Ott*

---

Sarah Ott, P.E.  
Olympic Region Traffic Engineer

11/9/2022

---

Date

HQ Traffic Concurrence:

---

Brian J. Walsh, P.E.  
State Traffic Design & Operations Manager

---

Date

# Skokomish Site Intersection Control Evaluation

*Prepared for*

**Skokomish Tribe**

80 N Tribal Center Road  
Skokomish, WA 98584

*Prepared by*

Kallyse Crawford, PE

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Preparation Supervised by: \_\_\_\_\_

Date: 11/4/2021

By Kevin House  
Parametrix

## CITATION

Parametrix, 2021. Skokomish Site Intersection Control Evaluation.  
Prepared by Parametrix, Puyallup, Washington. November 2021.

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- A Volume Development
- B Operations Analysis Results

## ACRONYMS AND ABBREVIATIONS

AASHTO	American Association of State Highway and Transportation Officials
CAL	crash analysis location
FGTS	Freight and Goods Transportation System
FHWA	Federal Highway Administration
HCM	Highway Capacity Manual
HSS	Highway of Statewide Significance
ICE	intersection control evaluation
IHS	Interstate Highway System
LOS	level of service
LUC	Land Use Code
MP	milepost
mph	miles per hour
NHFN	National Highway Freight Network
NHS	National Highway System
PDO	property-damage only
PSIC	Puget Sound Industrial Center
sec/veh	seconds per vehicle
SR	State Route
SRH	Scenic and Recreational Highways
WSDOT	Washington State Department of Transportation

# 1. INTRODUCTION

The Skokomish Tribe plans to develop a site located off of State Route (SR) 3, approximately half a mile north of SW Lake Flora Road in Kitsap County. This development includes a gas station, convenience store, and liquor store, with a planned commercial development in an adjacent parcel. In order to develop this site, access needs to be provided via the existing SR 3 corridor. Figure 1 includes a vicinity map of the area encompassing the Skokomish site.

This intersection control evaluation (ICE) report summarizes the analysis of intersection control for the proposed access for the Skokomish site development. This report was prepared in accordance with the Washington State Department of Transportation (WSDOT) Design Manual Chapter 1300 on Intersection Control Type. It consists of a five-step process to screen and evaluate alternatives to determine the best possible intersection type and design.

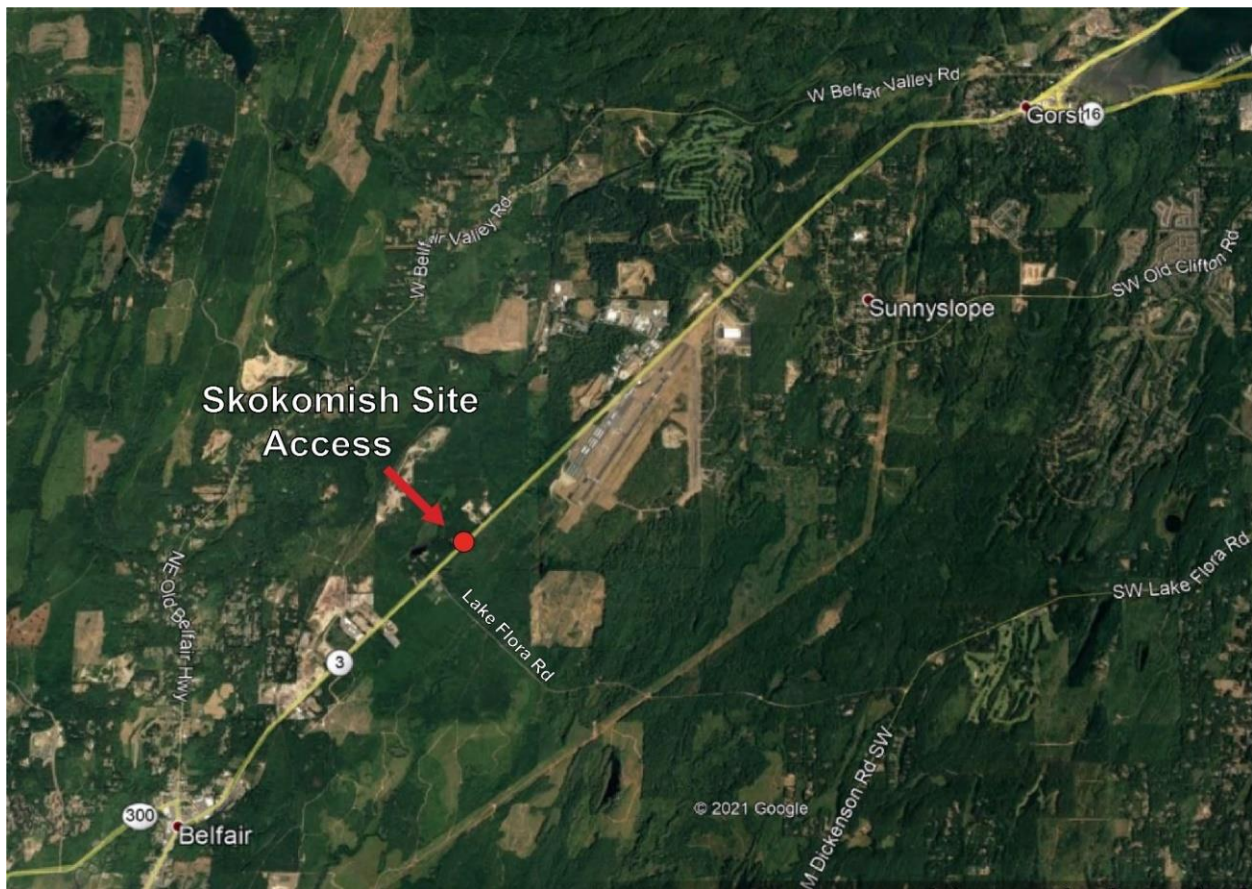


Figure 1. Vicinity Map

## 1.1 Study Purpose

This intersection control evaluation report summarizes the analysis of various types of intersection controls at the study intersection.

This report was prepared in accordance with WSDOT Design Manual Chapter 1300 on Intersection Control Type and evaluates intersection control alternatives based on feasibility, traffic operations

analysis, and qualitative benefit/cost analysis. Other considerations include right-of-way, environmental impacts, context-sensitive design, and multimodal considerations.

Recommendations on methods of intersection control are presented based on this analysis.

## 2. STEP 1: BACKGROUND AND PROJECT NEEDS

### 2.1 Background

The Skokomish project would develop a proposed gas station/convenience store and attached liquor store in what is referred to as Parcel B, which is located to the west of SR 3. The development would include construction of a gas station with an approximately 10,000-square-foot convenience store and attached 5,000-square-foot liquor store and is anticipated to be constructed and opened by 2023. The gas station would include eight gas pumps, which would allow for 16 simultaneous vehicle fueling positions. The site access to SR 3 would be located approximately 2,000 feet north of the SR 3 and Lake Flora Road intersection.

Additional future development is planned for a separate parcel on the site following the initial gas station/convenience store development. It is currently unknown what this development would specifically include, but it is likely to be a commercial use. The additional development would occur following the development on Parcel B but is anticipated to be opened by 2026. Refer to Figure 2 for parcel locations.

#### 2.1.1 SR 3 Freight Corridor

It is important to note that the SR 3 corridor has been identified for future upgrades with the introduction of the SR 3 Freight Corridor. The need for the SR 3 Freight Corridor has been recognized in both state and local plans for more than a decade. This project will construct a new regional route around the Belfair commercial district in Mason County. The current preferred alignment provides a bypass roadway from milepost (MP) 22.81 at the junction of SR 3 and SR 302 in Mason County to MP 29.49 at the junction of SR 3 and Lake Flora Road in Kitsap County. This site is not anticipated to impact the future SR 3 Freight Corridor project.

### 2.2 Existing Conditions

#### 2.2.1 Roadway Descriptions

The Skokomish site development is planned off of the existing SR 3 corridor, north of Belfair and the SW Lake Flora Road intersection. SR 3 connects Mason and Kitsap counties along the Kitsap Peninsula to US 101 in Shelton on the west end and SR 16 in Bremerton on the east end.

WSDOT classifies SR 3, within the study area, as a Rural Other Principal Arterial with an annual average daily traffic in 2020 of 15,000 vehicles per day. This section of SR 3 is designated as a critical rural freight corridor, with the freight classification of T-3, and is part of the National Highway Freight Network (NHFN). SR 3 is also identified as a National Highway System (NHS) route and as a Highway of Statewide Significance (HSS). The NHS was established by the U.S. Congress and implemented by the Federal Highway Administration (FHWA) as a way of focusing resources on the nation's most important



highways. The NHS includes the Interstate Highway System (IHS), as well as other roads important to the nation's economy, defense, and mobility. HSS facilities include interstate highways and other principal arterials that are needed to connect major communities in the state. The designation assists with the allocation and direction of funding.

SR 3 within the study area is not designated as one of Washington's Scenic and Recreational Highways (SRH). However, SR 3 is often used to access the Pacific Coast Scenic Byway, either at the northern terminus at Hood Canal or at the southern terminus at US 101.

SR 3 in the study area is a two-lane road with a speed limit of 50 miles per hour (mph). The existing SR 3 travel lanes are approximately 12 feet wide with 6-foot shoulders. At the location of the proposed side development, there is no existing access or minor leg connecting to SR 3.

In this study area, parcels are largely undeveloped.

### 2.2.2 Nonmotorized Facilities

Currently, there are no pedestrian or bike facilities outside of the Belfair Urban Growth Area (UGA).

### 2.2.3 Transit

Mason Transit operates transit service in Mason County, with one route serving Belfair through the study area, providing connections to the surrounding communities and important commuter destinations. The route serving Belfair is as follows.

- Route 23: Provides express service between Belfair and Bremerton via SR 3, with limited daily trips.

In addition to fixed route service, Mason Transit also operates complementary paratransit service and vanpool programs. More than half of the vanpools connect communities in Mason County to the Naval Station in Bremerton, while others serve Bangor, Keyport, and Seattle.

### 2.2.4 Existing Freight Traffic

WSDOT classifies all highways, county roads, and city streets by reported annual gross truck tonnage, ranging from T-1, the highest tonnage, to T-5, the least tonnage. According to the Washington State Freight and Goods Transportation System (FGTS), the SR 3 corridor is classified as a T-3 corridor. On average, 2,570,000 tons of freight are carried on this corridor annually. As such, it is important that the chosen alternative is designed to accommodate the freight that will travel through the corridor. Additionally, this corridor has serviced a large volume of oversized vehicles in 5 years.

---

*Between January 2014 and June 2019, 3,278 oversized vehicle permits have been filed to use the SR 3 corridor.*

---

## 2.3 Project Baseline and Contextual Needs

### 2.3.1 Metrics and Targets

SR 3 in the vicinity of this site development is a high-speed arterial with a speed limit of 50 mph in the study area. SR 3 is identified as a critical rural freight corridor as part of the NHFN, and it has been noted that this section of the SR 3 corridor services a large volume of oversized vehicles. SR 3 is also a part of the NHS route and HSS. Due to existing freight traffic and these designated highway classifications, solutions proposed for intersection control must be able to accommodate freight and oversized vehicles.

In order to develop the Skokomish site, intersection controls proposed must achieve the following metrics and targets:

- Provide safe and convenient access to the Skokomish site development and SR 3.
- Maintain consistency with the SR 3 Freight Corridor traffic control decisions and safety.
- Operate at or above the WSDOT level of service (LOS) D standard.
- Accommodate large, oversized vehicles on SR 3.
- Protect or improve the environment (avoid/limit impact to wetlands).
- Minimize right-of-way acquisition.
- Utilize practical solutions and design.

### 2.3.2 Modal Priority

The modal priorities of the proposed site access are as follows:

1. Freight
2. Vehicles
3. Pedestrians, Cyclists, Transit

In addition to passenger cars and trucks, SR 3 is a highly used freight corridor. Due to its designation as a freight corridor, freight is listed as the first priority, as the proposed access will need to be able to accommodate freight for deliveries. The intersection design will also need to accommodate the large, oversized freight vehicles that will travel through the intersection along the SR 3 corridor. Although there is a Mason Transit route that travels along SR 3 through this study area, there are no stops in the study area. Given the low volumes of regular pedestrians, cyclists, and transit, these groups have been given a lower priority.

## 2.4 Proposed Alternatives

### 2.4.1 Stop-Controlled Alternative

One alternative for the Skokomish site development would be to add a minor stop-controlled leg at the site access. However, this alternative poses challenges. The SR 3 corridor is a high-speed corridor. To allow vehicles to enter and exit SR 3, the Stop-Controlled Alternative would require a left-turn lane into the minor leg and acceleration/deceleration lanes on SR 3, potentially requiring additional right-of-way.

The SR 3 corridor currently experiences poor safety and traffic operations at similar stop-controlled intersections. Given the expected future volumes and safety concerns for vehicles crossing a high-speed roadway, the stop-controlled intersection does not meet the project goals of safe, efficient access. Therefore, the Stop-Controlled Alternative is not considered a viable alternative and is removed from further consideration.

### 2.4.2 Traffic Signal Alternative

Another alternative for the Skokomish site intersection would be to install a traffic signal. However, a traffic signal would not be consistent with the targets and metrics. Since the SR 3 corridor is a high-speed corridor, a traffic signal would be associated with safety challenges. Furthermore, a traffic signal would not maintain mainline consistency with the proposed roundabouts planned with the SR 3 Freight Corridor. Given that the safety concerns with the Traffic Signal Alternative and lack of compatibility with the future SR 3 Freight Corridor do not meet the project goals of a safe and compatible access, the traffic signal is not considered a viable alternative and is removed from further consideration.

### 2.4.3 Roundabout Alternative

In accordance with the WSDOT Design Manual Chapter 1300, a Roundabout Alternative is evaluated for the proposed site access. The proposed roundabout is a single-lane roundabout with right-turn lanes into and out of the site access. Westbound, into the site development, the right-turn lane continues as an additional lane and is then dropped. The right-turn lane out of the site development merges at the southbound exit point. The inscribed circle diameter ranges from 135 to 155 feet.

See Figure 2 and Figure 3 for a concept of the proposed Roundabout Alternative.

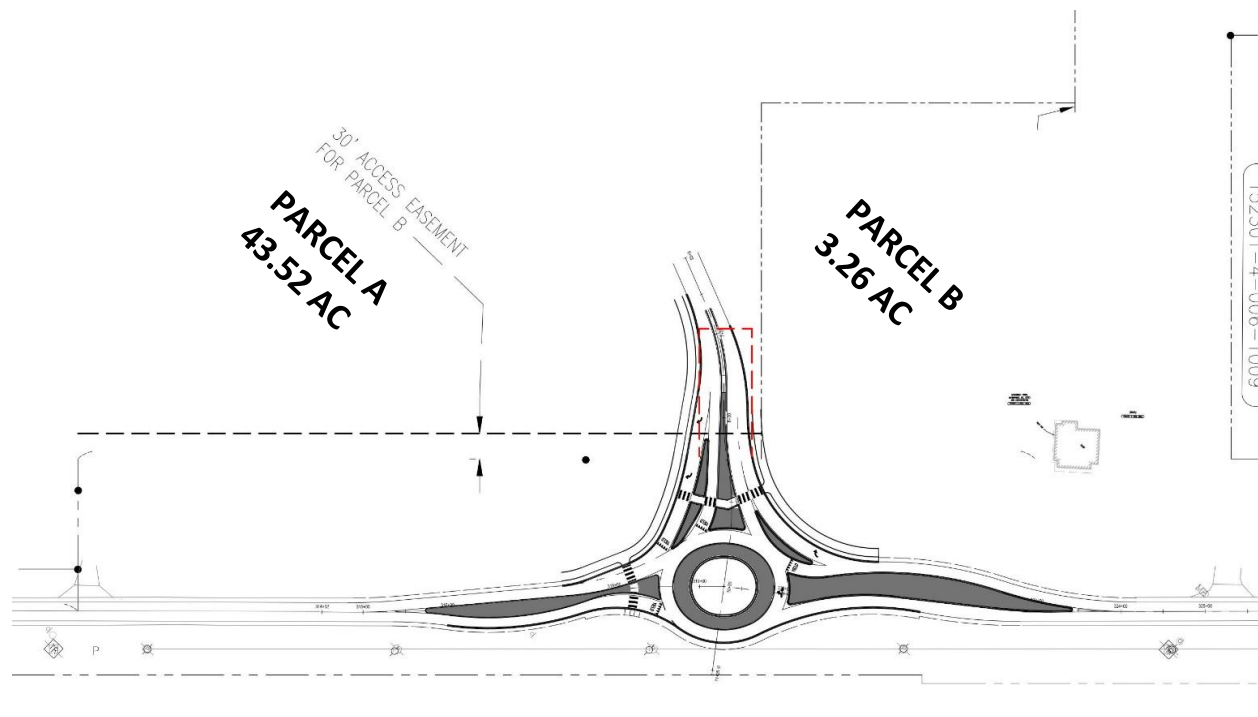


Figure 2. Skokomish Site Access Roundabout Layout with Parcel Location



**Parametrix** DATE: March 15, 2021 FILE: SKOKOMISH\_JCE

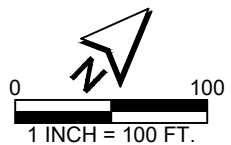


Figure 3. Proposed Roundabout Concept



## 3. STEP 2: FEASIBILITY

### 3.1 Right-of-Way

With the construction of the Roundabout Alternative, right-of-way acquisition is not anticipated. The proposed roundabout can be constructed within WSDOT right-of-way and site development property.

### 3.2 Environmental Impacts

The potential environmental impacts of the proposed intersection control improvements were evaluated qualitatively. Environmental impacts for roadway projects generally include impacts to air quality, noise level, stormwater treatment, wetlands, and impervious pavement design.

As compared with other intersection control treatments, a roundabout is expected to have reduced queues. Reduced queues would in turn result in improved air quality – more than other intersection control treatments, which may have longer delays and idling vehicles. Roundabout queues are classified as moving queues, which can reduce noise and fuel consumption by reducing the number of acceleration/deceleration cycles and the time spent idling.

Stormwater is not currently being captured or treated in the study area. As part of the Roundabout Alternative, stormwater treatment and a flow control pond are planned. Therefore, implementation of a roundabout alternative would improve water quality within this section of the corridor.

The proposed Roundabout Alternative is not expected to directly impact or cross any wetlands.

As the study area is largely undeveloped, construction of the proposed improvements would remove existing trees adjacent to the improvements and along the SR 3 corridor route.

### 3.3 Context-Sensitive Design

The impacts of the Roundabout Alternative are the short-term disruption to the community via construction and removal of trees.

As the SR 3 corridor is a designated freight route and also identified for future upgrades with the construction of the SR 3 Freight Corridor, freight must be able to pass through the intersection. With the high number of oversized vehicles on the SR 3 corridor, the intersection must also be able to accommodate oversized vehicles.

The proposed roundabout will therefore use a design vehicle of a WB-67 and will accommodate a Lowboy, which is approximately 145 feet in length, for the SR 3 through movement.

In the long term, roundabouts are considered a cost effective option for intersection control. Roundabouts do not require hardware, maintenance, or electrical costs. Roundabouts are also considered to handle higher volumes of traffic more efficiently than other types of intersection control, such as a traffic signal.<sup>1</sup>

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<sup>1</sup> WSDOT Roundabout Benefits: <https://wsdot.wa.gov/Safety/roundabouts/benefits.htm>.

## 4. STEP 3: OPERATIONAL AND SAFETY PERFORMANCE ANALYSIS

This section provides traffic analysis for the design of the Roundabout Alternative, which would connect the existing SR 3 corridor to the proposed Skokomish site development.

### 4.1 Traffic Volumes Forecast

The Opening Year (2023) volumes were determined using data from the SR 3 Freight Corridor Planning Study conducted in 2020 conducted by Parametrix. In accordance with this study, PM peak-hour counts from the SR 3 and Lake Flora Road intersection from May 2019 were used to develop volumes along the SR 3 corridor at the project site. The PM peak hour for these traffic counts was determined to be from 4 to 5 p.m. It is noted that the local naval base has a shift change during this hour.

Travel and volume forecasts for the proposed site access were also estimated using ITE *Trip Generation* estimates for Land Use Code (LUC) 960 – Super-Convenience Gas Station, and LUC 899 – Liquor Store. Additional future development is planned for a separate parcel on the site following the initial gas station/convenience store development. It is currently unknown what this development would specifically include, but it is likely to be a commercial use. Trip generation for this additional development was estimated based on potential uses and sizes using trip generation rates from ITE *Trip Generation* and other market studies.

To develop 2023 volumes, the 2019 existing volumes used in the study were increased by a growth rate of 1 percent per year, which was the same growth rate assumed in the study for the PM peak hour based on historic traffic volume growth patterns in the area. Trip generation estimates and pass-by trips were then added to these counts. The resulting 2023 traffic volumes are shown in Figure 4.

The SCJ Alliance study also developed 2025 forecasts for the Lake Flora Road/SR 3 intersection, which included projected growth from the PSIC (Puget Sound Industrial Center) to the north as well as projected development near Log Yard Road to the south outside of Belfair. A 1 percent growth rate was applied to the 2025 projected volumes to arrive at 2026 base volumes.

For the Future Year (2026) volumes, volumes were developed and analyzed for both partial and full buildout scenarios. Trip generation estimates and pass-by trips were added to these counts for Parcel B, the proposed gas station/convenience store, and the attached liquor store. The resulting 2026 traffic volumes for the Parcel B proposed development are shown in Figure 5.

The trip generation estimates and pass-by trips were then added to the 2026 Parcel B volumes to determine the full buildout volumes for both Parcel B and future commercial. The resulting 2026 Full Buildout traffic volumes are shown in Figure 6.

See Appendix A for traffic volume development and associated Skokomish Site SR 3 Access Roundabout Traffic Analysis Technical Memorandum.

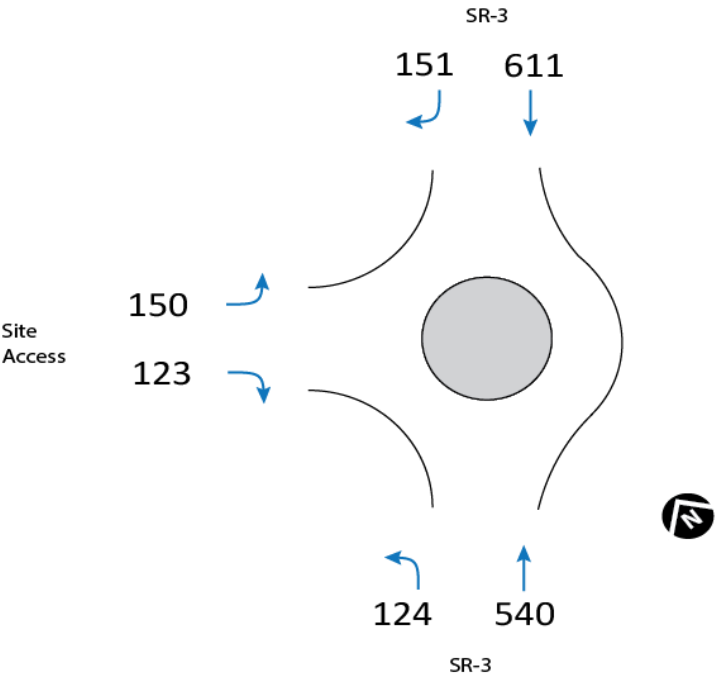


Figure 4. 2023 Weekday PM Peak Hour with Parcel B Proposed Development

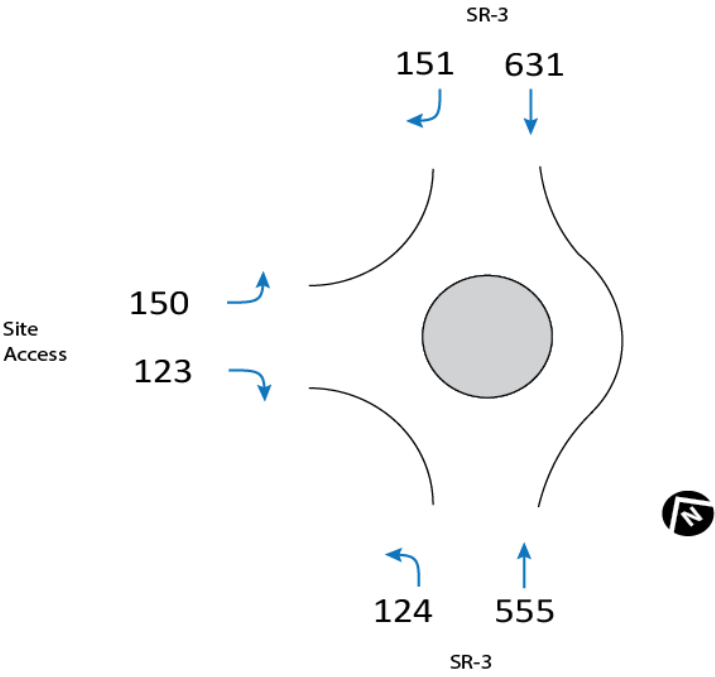


Figure 5. 2026 Weekday PM Peak Hour with Parcel B Proposed Development

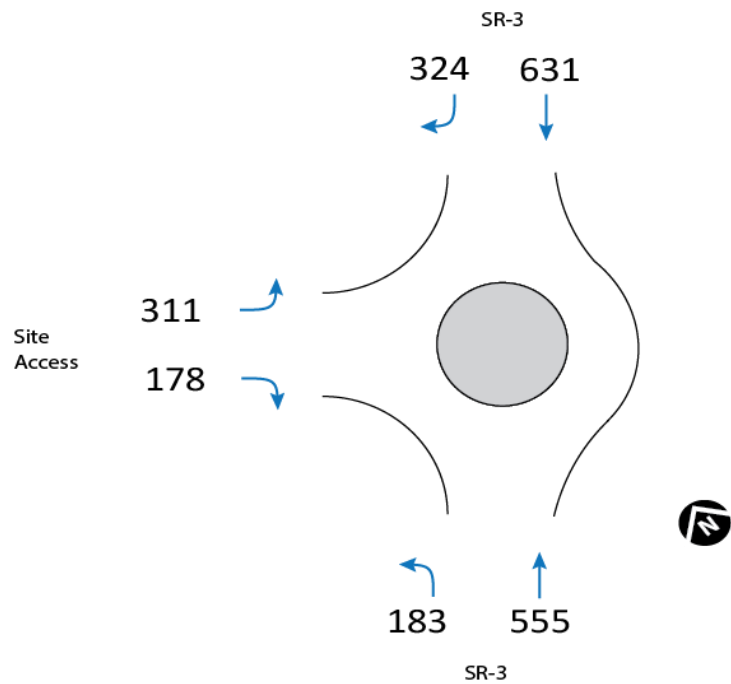


Figure 6. 2026 Weekday PM Peak Hour for Full Buildout

## 4.2 Traffic Operations Analysis

The traffic operations analysis for the study intersections used the software program Sidra Intersection 9.0<sup>2</sup> for roundabout intersections. Traffic operations for the roundabout alternatives were calculated based on methodologies described in the Highway Capacity Manual (HCM). Traffic operations are often measured by an approach called intersection LOS. LOS is a scale ranging from A to F in which rankings are based on the overall delay at a given intersection. LOS A represents the best conditions with minimal amount of delay, and LOS F represents the worst conditions with severe congestion and delay.

Table 1 lists the intersection LOS delay thresholds for signalized and unsignalized intersections. For signalized intersections and roundabouts, LOS is measured in average delay per vehicle and reported for the entire intersection. For unsignalized intersection, LOS is reported for the worst approach movement.

Table 1. Level of Service Thresholds

Level of Service (LOS)	Average Control Delay per Vehicle (seconds)	
	Signalized Intersections (sec/veh)	Unsignalized (sec/veh)
A	≤ 10	≤ 10
B	> 10 and ≤ 20	> 10 and ≤ 15
C	> 20 and ≤ 35	> 15 and ≤ 25

<sup>2</sup> Software consistent with most recent WSDOT Sidra policy (June 2019).



Level of Service (LOS)	Average Control Delay per Vehicle (seconds)	
	Signalized Intersections (sec/veh)	Unsignalized (sec/veh)
D	> 35 and ≤ 55	> 25 and ≤ 35
E	> 55 and ≤ 80	> 35 and ≤ 50
F	> 80	> 50

sec/veh = seconds per vehicle.

Note: The LOS criteria are based on control delay, which includes initial deceleration delay, queue move-up time, stopped delay, and final deceleration delay.

Source: Transportation Research Board Highway Capacity Manual, 2010

WSDOT LOS operation standards for the SR 3 Freight Corridor study intersections is LOS D and is based on PSRC (Puget Sound Regional Council) standards for Highways of Statewide and Regional Significance in Kitsap County.<sup>3</sup>

The traffic operations analysis for the Roundabout Alternative was completed for the Opening Year (2023) Conditions, Future Year (2026) Conditions, and Future Year Full Buildout (2026) Conditions, which would include the commercial development in addition to Parcel B developments. Operations for the Roundabout Alternative utilized Sidra in compliance with WSDOT policy. All traffic operations worksheets are included in Appendix B.

#### 4.2.1 Opening Year (2023) Traffic Operations

For the Roundabout Alternative, the Opening Year (2023) Conditions were analyzed. With a single-lane roundabout at the site access, Opening-Year Conditions are expected to meet WSDOT standards in both peak and off-peak hours. The FHWA reports that the roundabout benefit of reduced delay is in large part during the off-peak hours.<sup>4</sup> See Table 2 for Opening-Year operations results.

**Table 2. Opening Year (2023) PM Peak-Hour Operations**

Intersection Control	Direction or Leg	Roadway	PM Peak Hour		
			2023 Opening Year		
			LOS	Delay (sec/veh)	V/C Ratio
Single-Lane Roundabout	NB	SR 3	A	6	0.59
	SB	SR 3	A	4	0.48
	EB	Site Access	A	10	0.16
	Overall Intersection		A	6	0.58

Notes: LOS = level of service; sec/veh = seconds per vehicle; V/C = vehicle count; WB = westbound; NB = northbound; SR = state route; SB = southbound.

<sup>3</sup> [https://www.psrc.org/sites/default/files/los\\_hss\\_kitsap.pdf](https://www.psrc.org/sites/default/files/los_hss_kitsap.pdf).

<sup>4</sup> <https://www.fhwa.dot.gov/publications/research/safety/00067/000673.pdf>.

## 4.2.2 Future Year (2026) Traffic Operations

For the Roundabout Alternative, the Future Year (2026) Conditions were analyzed for the Parcel B proposed development. With a single-lane roundabout at the site access, Future Year Conditions for the proposed development are expected to meet WSDOT standards in both peak and off-peak hours. In 2026, there is a slight improvement in operations due to a decreased environmental factor. The environmental factor is lowered from 1.1 to 1.0 in the Future Year (2026) analyses to account for drivers becoming more familiar and comfortable with the roundabouts after they are installed. See Table 3 for Future Year (2026) operations results for the Parcel B development.

**Table 3. Future Year (2026) PM Peak-Hour Operations**

Intersection Control	Direction or Leg	Roadway	PM Peak Hour		
			2026 Future Year		
			LOS	Delay (sec/veh)	V/C Ratio
Single-Lane Roundabout	NB	SR 3	A	5	0.54
	SB	SR 3	A	4	0.44
	EB	Site Access	A	10	0.14
	Overall Intersection		A	5	0.54

Notes: LOS = level of service; sec/veh = seconds per vehicle; V/C = vehicle count; WB = westbound; NB = northbound; SR = state route; SB = southbound.

## 4.2.3 Full Buildout (2026) Traffic Operations

For the Roundabout Alternative, the Future Year (2026) Conditions were analyzed for the Parcel B proposed development and the planned commercial development in Parcel A. With a single-lane roundabout at the site access, Future Year Conditions for the full buildout are expected to meet WSDOT standards in both peak and off-peak hours. See Table 4 for Full Buildout (2026) operations results.

**Table 4. Full Buildout (2026) PM Peak-Hour Operations**

Intersection Control	Direction or Leg	Roadway	PM Peak Hour		
			2026 Future Year		
			LOS	Delay (sec/veh)	V/C Ratio
Single-Lane Roundabout	NB	SR 3	A	8	0.67
	SB	SR 3	A	4	0.46
	EB	Site Access	B	10	0.30
	Overall Intersection		A	5	0.67

Notes: LOS = level of service; sec/veh = seconds per vehicle; V/C = vehicle count; WB = westbound; NB = northbound; SR = state route; SB = southbound.

## 4.2.4 Roundabout Design Speed

The proposed roundabout alternatives include entry curves and splitter islands that are used to reduce speeds for the approaching traffic on the SR 3 corridor. The target entry speed for the roundabout is 15 to 25 mph.

## 4.3 Safety Analysis

### 4.3.1 Collision History

*Under 23 United States Code §148 and 23 United States Code §409, safety data, reports, surveys, schedules, lists compiled or collected for the purpose of identifying, evaluating, or planning the safety enhancement of potential crash sites, hazardous roadway conditions, or railway-highway crossings are not subject to discovery or admitted into evidence in a federal or state court proceeding or considered for other purposes in any action for damages arising from any occurrence at a location mentioned or addressed in such reports, surveys, schedules, lists, or data.*

A basic safety-level analysis of the corridor was performed, assessing current safety performance, summarizing recent crash history, and reporting on any major contributing factors to fatal and serious injury crashes. Crash data was collected between January 1, 2016, through December 31, 2020, on the SR 3 corridor within half a mile of the site access location, between MP 28.65 and MP 29.65. During this time, 44 crashes were reported, of which 23 occurred at the study intersections. Of these crashes, six reported the contributing factor of the crash to be exceeding a safe speed.

Table 5 summarizes, by severity and type, crashes at intersections and along the SR 3 study area segment. Crash records indicate that the type and severity of crashes appears to be consistent with congested urban conditions. Rear-end and property-damage only (PDO) or noninjury crashes account for the greatest number of crashes, although there is a high concentration of angle crashes at the Lake Flora Road intersection and an almost equal number of rear-end collisions along the segment. The number of crashes tends to increase under congested conditions, but the severity of those crashes is generally lower, due to lower speeds.

**Table 5. Historical Crash Rates and Crashes Summarized by Severity and Type for Study Intersections/Segments**

Year	Total Crashes	Crash Severity				Crash Type							
		Fatality	Serious Injury	Minor or Possible Injury	PDO <sup>a</sup>	Head-On	Angle	Sideswipe	Rear-End	Run Off Road <sup>b</sup>	Fixed Object	Wild Animal	Pedestrian/Cyclist
2016	10	0	1	2	7	1	3	1	0	4	1	0	0
2017	11	1	0	3	7	2	6	0	1	2	0	0	0
2018	7	0	0	2	5	0	1	1	1	3	1	0	0
2019	10	0	1	3	6	0	3	2	2	3	0	0	0
2020	6	0	0	2	4	0	2	0	0	1	1	2	0
<b>Total</b>	<b>44</b>	<b>1</b>	<b>2</b>	<b>12</b>	<b>29</b>	<b>3</b>	<b>15</b>	<b>4</b>	<b>4</b>	<b>13</b>	<b>3</b>	<b>2</b>	<b>0</b>

Year	Total Crashes	Crash Severity				Crash Type							
		Fatality	Serious Injury	Minor or Possible Injury	PDO <sup>a</sup>	Head-On	Angle	Sideswipe	Rear-End	Run Off Road <sup>b</sup>	Fixed Object	Wild Animal	Pedestrian/Cyclist
<b>Intersection Crashes</b>													
SR 3/Lake Flora Road	23	0	2	8	13	2	12	1	2	4	2	0	0

Source: January 2016 through December 2020 data from WSDOT Crash Database.

<sup>a</sup> PDO = property damage only.

<sup>b</sup> Off-road crashes refer to crash types involving roadway ditches, embankments, overturned vehicles, or crash cushions.

Notes: SR = state route

There were 44 total crashes on SR 3 over the 5-year period within a half-mile of the project site. There were one fatal crash, two serious injury crashes, and 12 minor or possible injury crashes. The most common crash types were angle (15 crashes) and run off roadway/rollover (13 crashes). Of all the crashes reviewed, 23 of the 44 total crashes occurred at the Lake Flora Road/SR 3 intersection, including 12 of the 15 angle crashes. Table 5 shows a summary of crashes on SR 3 the last 5 years, including crash severity and manner of collision. Crashes that occurred at the Lake Flora Road/SR 3 intersection are broken out separately for comparison.

It is also noted that in May 2017, the SR 3 study area speed was lowered from 55 mph to 50 mph. In 2017, 11 collisions were reported in the study area. In 2018, after the speed change was implemented, the number of reported collisions were reduced by almost half.

### 4.3.2 Safety Benefits

FHWA's Proven Safety Countermeasures initiative promotes certain infrastructure-oriented safety treatments and strategies, chosen based on proven effectiveness and benefits, to encourage widespread implementation by state, tribal, and local transportation agencies to reduce serious injuries and fatalities on American highways.

FHWA identifies roundabouts as a Proven Safety Countermeasure because of their ability to substantially reduce the types of crashes that result in injury or loss of life. Roundabouts are designed to improve safety for all users, including pedestrians and bicycles. Most significantly, roundabouts reduce the types of crashes where people are seriously hurt or killed by 78 to 82 percent when compared with conventional stop-controlled and signalized intersections, per the American Association of State Highway and Transportation Officials (AASHTO) *Highway Safety Manual*. The potential for hazardous conflicts, such as high-speed right-angle, left-turn, and head-on crashes, is virtually eliminated by the geometry of a roundabout.

Additionally, reducing the number and type of conflict points (i.e., the number of locations where the travel paths of two different vehicles may cross) at intersections by restricting certain turning movements also influences safety. Reducing conflict points on highways by limiting left turns has proven to reduce overall crashes by 5 to 23 percent along rural two-lane highways and injury/fatal crashes by 25 to 31 percent along urban/suburban arterials.



Low absolute speeds associated with roundabouts allow drivers more time to react to one another. These lower speeds would reduce severity of crashes even among rear-end crashes, which were the most common crash type along the analyzed segment of SR 3.

The Roundabout Alternative is expected to minimize the number of serious injury and fatal crashes at this intersection.

## 4.4 Multimodal Operations

### 4.4.1 Nonmotorized Facilities

Nonmotorized facilities are not currently provided within the study area, apart from striped shoulders. The addition of the roundabout, with proposed crosswalks and sidewalks, would improve pedestrian crossing opportunities at the intersection. Additionally, the splitter island refuge areas would provide the ability for pedestrians to focus on one traffic stream at a time while crossing, allowing for safer crossings.<sup>5</sup>

### 4.4.2 Transit

As discussed in Section 2.2.2, Mason Transit currently operates a route in the study area, with transit stops along the existing SR 3 corridor. The roundabout alternative can accommodate Mason Transit buses, and the pedestrian facilities provided in the proposed roundabout alternative would allow for safer crossings for transit users. Safer crossings may also potentially encourage ridership in the area.

## 5. STEP 4: ALTERNATIVES EVALUATION

The Skokomish Tribe plans to develop a parcel located off SR 3, approximately half a mile north of SW Lake Flora Road in Kitsap County. This development includes a gas station, convenience store, and liquor store, with a planned commercial development in an adjacent parcel. In order to develop this site, access needs to be provided via the existing SR 3 corridor.

In order to develop the Skokomish site, intersection controls proposed must achieve the following metrics and targets:

- Provide safe and convenient access to the Skokomish site development and SR 3.
- Operate at or above the WSDOT LOS D standard.
- Accommodate large, oversized vehicles on SR 3.
- Protect or improve the environment (avoid/limit impact to wetlands).
- Minimize right-of-way acquisition.
- Utilize practical solutions and design.

Based on the analysis presented in this report, the following intersection control alternatives are evaluated in terms of these project needs and objectives. Refer to 6 for evaluation of these metrics.

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<sup>5</sup> Intersection Safety Roundabouts: Federal Highway Administration (March 2021).

## 6. Alternative Evaluation

Alternative	Safe/ Convenient Access	WSDOT LOS Standard	Oversized Vehicles	Protect/ Improve Environment	Minimize ROW	Practical Design
Roundabout Alternative	✓	✓	✓	✓	✓	✓

Steps 1 through 3 (Sections 2 through 4) above identify the preferred alternative to be a single-lane roundabout. In accordance with the WSDOT Design Manual Chapter 1300 on Intersection Control Type, further evaluation is not necessary.

## 6. SELECTION

Based on the performance tradeoffs and documented project needs discussed above, the recommended intersection alternative for the Skokomish site development is the single-lane Roundabout Alternative.

# Appendix A

## Volume Development



**Table A-1. Weekday Daily Trip Generation Estimate**

Land Use	ITE Land Use Code	Size	Trip Rate	Gross Trips			Internal Trips			Pass-By Trips		New Trips		
				Total	In	Out	In	Out	Rate	In	Out	Total	In	Out
Super-Convenience Gas Station	960	16 vfp	315.8 per vfp	5,050	2,525	2,525	105	105	56%	1,355	1,355	2,130	1,065	1,065
Liquor Store	899	5,000 ksf	139.0 per ksf	700	350	350	105	105	34%	85	85	320	160	160
<b>Total</b>				<b>5,750</b>	<b>2,875</b>	<b>2,875</b>	<b>210</b>	<b>210</b>		<b>1,440</b>	<b>1,440</b>	<b>2,450</b>	<b>1,225</b>	<b>1,225</b>

Note: vfp = vehicle fueling position; ksf = 1,000 square feet.

**Table A-2. Weekday PM Peak-Hour Trip Generation Estimate**

Land Use	ITE Land Use Code	Size	Trip Rate	Gross Trips			Internal Trips			Pass-By Trips		New Trips		
				Total	In	Out	In	Out	Rate	In	Out	Total	In	Out
Super-Convenience Gas Station	960	16 vfp	315.8 per vfp	503	252	251	17	17	56%	131	131	207	104	103
Liquor Store	899	5,000 ksf	139.0 per ksf	113	57	56	17	17	34%	13	13	53	27	26
<b>Total</b>				<b>616</b>	<b>309</b>	<b>307</b>	<b>34</b>	<b>34</b>		<b>144</b>	<b>144</b>	<b>260</b>	<b>131</b>	<b>129</b>

Note: vfp = vehicle fueling position; ksf = 1,000 square feet.



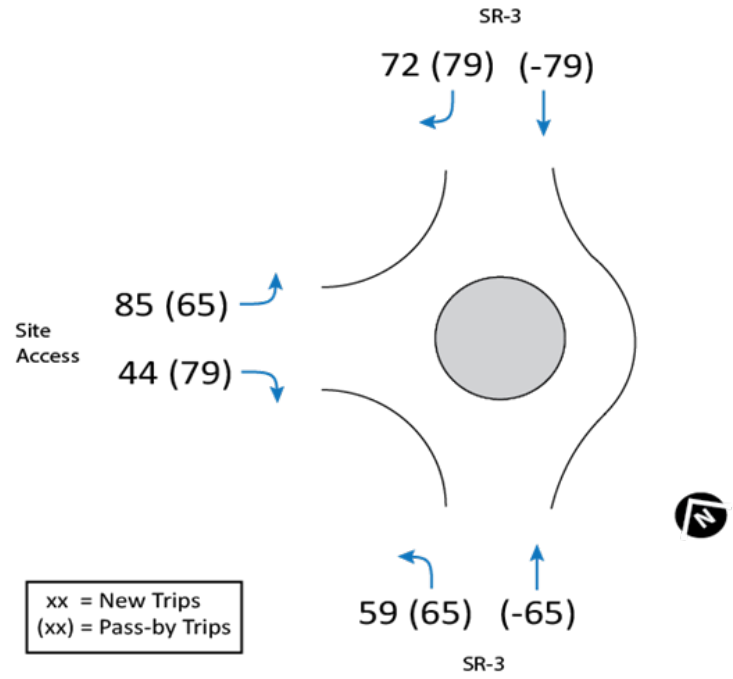


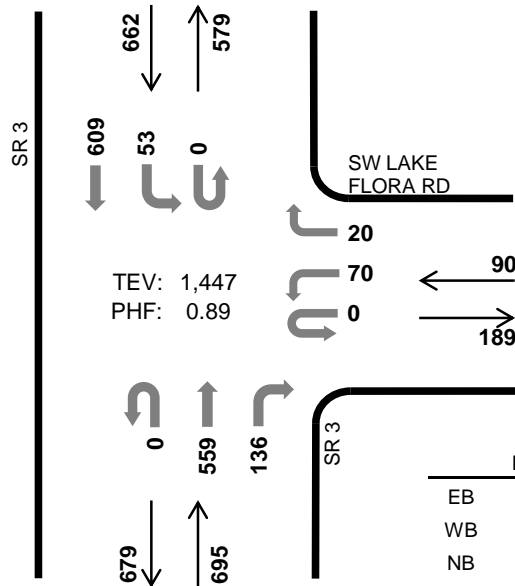
Figure A-1. Parcel B Weekday PM Peak-Hour Trip Assignment

# SR 3 SW LAKE FLORA RD



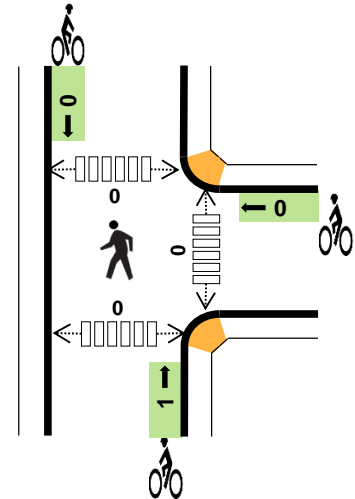
Peak Hour

Date: Wed, May 01, 2019  
Count Period: 4:00 PM to 6:00 PM  
Peak Hour: 4:00 PM to 5:00 PM



TEV: 1,447  
PHF: 0.89

	HV %:	PHF
EB	-	-
WB	4.4%	0.75
NB	3.0%	0.85
SB	3.6%	0.92
TOTAL	3.4%	0.89



## Two-Hour Count Summaries

Interval Start	0				SW LAKE FLORA RD				SR 3				SR 3				15-min Total	Rolling One Hour
	Eastbound				Westbound				Northbound				Southbound					
	UT	LT	TH	RT	UT	LT	TH	RT	UT	LT	TH	RT	UT	LT	TH	RT		
4:00 PM	0	0	0	0	0	23	0	7	0	0	132	46	0	9	171	0	388	0
4:15 PM	0	0	0	0	0	22	0	4	0	0	177	28	0	12	162	0	405	0
4:30 PM	0	0	0	0	0	14	0	5	0	0	146	36	0	19	121	0	341	0
4:45 PM	0	0	0	0	0	11	0	4	0	0	104	26	0	13	155	0	313	1,447
5:00 PM	0	0	0	0	0	24	0	1	0	0	111	41	0	10	180	0	367	1,426
5:15 PM	0	0	0	0	0	22	0	2	0	0	111	35	0	6	181	0	357	1,378
5:30 PM	0	0	0	0	0	22	0	3	0	0	134	33	0	5	183	0	380	1,417
5:45 PM	0	0	0	0	0	22	0	5	0	0	98	24	0	5	178	0	332	1,436
Count Total	0	0	0	0	0	160	0	31	0	0	1,013	269	0	79	1,331	0	2,883	0
Peak Hour	0	0	0	0	0	70	0	20	0	0	559	136	0	53	609	0	1,447	0

Note: Two-hour count summary volumes include heavy vehicles but exclude bicycles in overall count.

Interval Start	Heavy Vehicle Totals					Bicycles					Pedestrians (Crossing Leg)				
	EB	WB	NB	SB	Total	EB	WB	NB	SB	Total	East	West	North	South	Total
4:00 PM	0	2	4	5	11	0	0	0	0	0	0	0	0	0	0
4:15 PM	0	1	9	9	19	0	0	1	0	1	0	0	0	0	0
4:30 PM	0	1	6	3	10	0	0	0	0	0	0	0	0	0	0
4:45 PM	0	0	2	7	9	0	0	0	0	0	0	0	0	0	0
5:00 PM	0	0	7	1	8	0	0	0	0	0	0	0	0	0	0
5:15 PM	0	0	3	1	4	0	0	0	0	0	0	0	0	0	0
5:30 PM	0	0	1	1	2	0	0	0	0	0	0	0	0	0	0
5:45 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Count Total	0	4	32	27	63	0	0	1	0	1	0	0	0	0	0
Peak Hr	0	4	21	24	49	0	0	1	0	1	0	0	0	0	0

## TECHNICAL MEMORANDUM

JULY 21, 2021

TO: WSDOT Olympic Region  
FROM: Kyle Stahley, PE  
Tim Peterson  
SUBJECT: Skokomish Site SR-3 Access Roundabout Traffic Analysis  
CC: Susan Devine  
PROJECT NUMBER: 217-2249-038  
PROJECT NAME: Skokomish Site Development

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### INTRODUCTION

The Skokomish Tribe in Washington State is developing a parcel off SR-3, located north of Belfair, which would include the construction of a gas station, c-store, and liquor store. The development would be accessed via a new roadway connecting to SR-3 and the Tribe would construct a roundabout at the access point. The access would be located approximately one-half mile north of the SR-3 intersection with SW Lake Flora Road. Figure 1 shows the location of the proposed site access. This technical report documents future traffic operations at the proposed access.



Figure 1. Skokomish Site Location

## EXISTING CONDITIONS

The Skokomish project would develop a proposed gas station / c-store and attached liquor store on Parcel B, as shown in Figure 2. The site access to SR-3 will be located approximately 2,000 feet north of the SR-3/Lake Flora Road intersection. At the proposed access, SR-3 is a two-lane highway that runs northeast to southwest with one lane in each direction, and no center-turn lane. Existing lane widths on SR-3 are 12 feet wide with 6 feet wide shoulders. From the proposed access, SR-3 runs northeast to Gorst and Bremerton and southwest to Belfair. The posted speed limit on SR-3 is 50 mph. There are no existing bicycle or pedestrian facilities along SR-3 within the vicinity of the proposed access. Existing two-way traffic volumes on SR-3 at the proposed access are approximately 1,300 vehicles during the PM peak hour, with 700 vehicles in the southbound direction and 600 vehicles in the northbound direction.

The intersection at the proposed Skokomish site access is proposed to be a three-leg roundabout configuration, with SR-3 on the north and south legs, and the site access on the west leg of the roundabout. The roundabout is proposed to be a single lane roundabout with single lane approaches for all three directions, as well as right-turn slip lanes southbound and eastbound. Pedestrian crossings will be included across all three legs of the roundabout with an enhanced trail for active transportation along the western side of the roundabout and project site frontage. Figure 2 also shows the proposed roundabout layout.

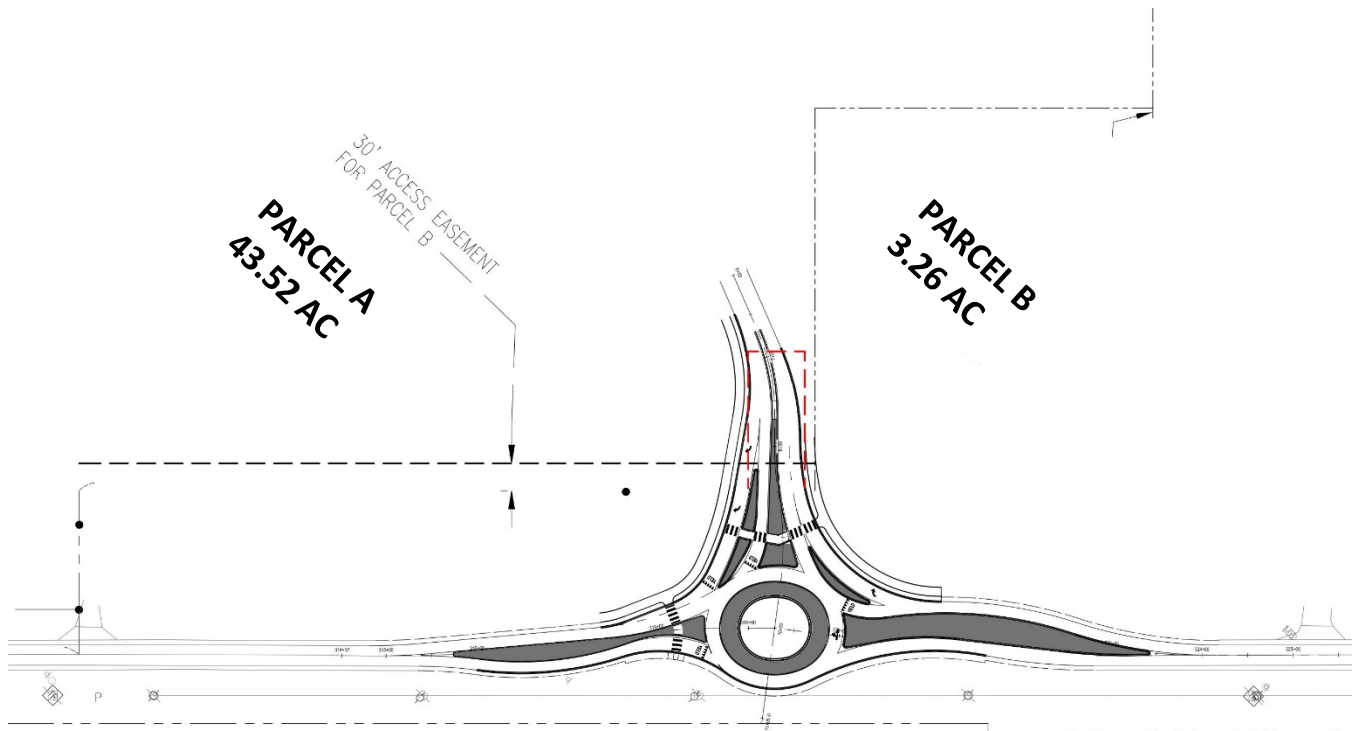


Figure 2. Skokomish Site Access Roundabout Layout and Parcel Location

## TRIP GENERATION

To develop future traffic volume forecasts at the proposed roundabout, Parametrix first estimated the number of vehicle trips to be generated by the proposed project.



The development would include construction of a gas station with an approximately 10,000 square foot c-store and attached 5,000 square foot liquor store and is anticipated to be constructed and opened by 2023. The gas station would include 8 gas pumps which would allow for 16 simultaneous vehicle fueling positions. The trip generation estimates for the proposed project were developed using trip rates from the Institute of Transportation Engineers (ITE) *Trip Generation* (10<sup>th</sup> Edition, 2017), localized market studies completed for this project.

The planned development would offer discounted gas and liquor, as well as other items, therefore it is assumed that the site would likely attract more customers, and thus have a higher number of trips, than an average gas station. To account for these increased trips, estimates from a market study conducted for this site were used to increase the base ITE trip generation rates. The market study, completed in November 2020 by an economic advisory firm, estimates that the proposed development would sell approximately 38 percent more fuel than an average gas station. Using the assumption that the liquor store would likely generate a similar increase from the base ITE trip rates, the daily and weekday PM peak hour trips were increased by 38 percent for both of the on-site land uses.

As the liquor store and gas station's c-store would be connected, it is likely that some customers to the site could visit both land uses. This behavior is considered an internal trip to the site and would result in the reduction in vehicle trips as the customer would walk between the two uses. Internal trip reduction methodology is outlined in the ITE *Trip Generation Handbook* (3<sup>rd</sup> Edition, 2017) but current methodology does not account for reduction of trips between two retail uses. Instead, it was assumed that 30 percent of the trips to the liquor store would be internal trips from the gas station. The gross vehicle trips to each land use was reduced by this amount to account for the internal trips between the two land uses.

Pass-by trips to a site include vehicle trips which are already traveling on an adjacent roadway and stop at an intermediate land use on the way to the driver's final destination. A gas station is a typical example of pass-by trips as driver's typically do not make a specific trip to a gas station and instead typically stop along the way of another trip (such as from work to home). Pass-by trips are still counted at the site driveway; however, they are not tracked throughout the rest of the roadway network as it is assumed the driver only temporarily deviates from their normal route and resumes their normal route following the stop at the pass-by land use. Pass-by trip rates from the *Trip Generation Handbook* were used for both the gas station and as no pass-by rate is published specifically for the liquor store, the pass-by rate for a similar use—a shopping center—was used instead.

The results of the weekday daily trip generation analysis for the proposed are shown in Table 1. The results of the weekday PM peak hour trip generation estimates shown in Table 2.

As shown in Table 1, the proposed development is anticipated to generate approximately 5,750 gross daily, one-way vehicle trips. After accounting for reductions from internal and pass-by trips, it is anticipated that development would generate 2,450 new trips to the roadway system with 5,330 daily driveway trips at the site access. As shown in Table 2, during the weekday PM peak hour, the site is estimated to generate 616 total vehicle trips with 548 total driveway trips (after accounting for internal trip capture between the two uses) and 260 new trips to the roadway system. The driveway trip estimates are used in developing forecast volumes for the analysis of traffic operations at the site access.

Table 1: Weekday Daily Trip Generation Estimate

Land Use	ITE Land Use Code	Size	Trip Rate <sup>1</sup>	Gross Trips			Internal Trips		Pass-By Trips			New Trips		
				Total	In	Out	In	Out	Rate	In	Out	Total	In	Out
Super-Convenience Gas Station	960	16 vfp	315.8 per vfp	5,050	2,525	2,525	105	105	56%	1,355	1,355	2,130	1,065	1,065
Liquor Store	899	5,000 ksf	139.0 per ksf	700	350	350	105	105	34%	85	85	320	160	160
<b>Total</b>				<b>5,750</b>	<b>2,875</b>	<b>2,875</b>	<b>210</b>	<b>210</b>		<b>1,440</b>	<b>1,440</b>	<b>2,450</b>	<b>1,225</b>	<b>1,225</b>

Note: vfp = vehicle fueling position, ksf = 1,000 square feet

Table 2: Weekday PM Peak Hour Trip Generation Estimate

Land Use	ITE Land Use Code	Size	Trip Rate	Gross Trips			Internal Trips		Pass-By Trips			New Trips		
				Total	In	Out	In	Out	Rate	In	Out	Total	In	Out
Super-Convenience Gas Station	960	16 vfp	315.8 per vfp	503	252	251	17	17	56%	131	131	207	104	103
Liquor Store	899	5,000 ksf	139.0 per ksf	113	57	56	17	17	34%	13	13	53	27	26
<b>Total</b>				<b>616</b>	<b>309</b>	<b>307</b>	<b>34</b>	<b>34</b>		<b>144</b>	<b>144</b>	<b>260</b>	<b>131</b>	<b>129</b>

Note: vfp = vehicle fueling position, ksf = 1,000 square feet

## TRIP DISTRIBUTION AND ASSIGNMENT

A trip distribution for the proposed development was determined using information from a market capture study for the project as well as the existing traffic patterns observed on SR-3 during the weekday PM peak hour. Using this information, it was assumed that approximately 55 percent of trips to the site are coming to/from the north toward Port Orchard and Bremerton with the remaining 45 percent of trips coming to/from the south toward Belfair.

The new trips from the weekday PM peak hour trip generation was assigned to the site access turning movements based on the trip distribution described. Pass-by trips were also assigned to the site access using the same distribution as it was based on the existing traffic patterns of SR-3. The weekday PM peak hour trip assignment, showing both new and pass-by trips, is shown in Figure 3.

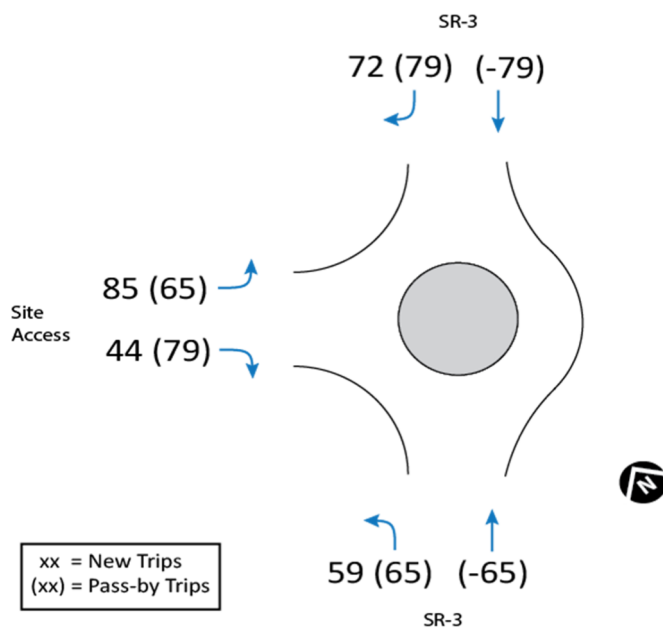


Figure 3. Parcel A Weekday PM Peak Hour Trip Assignment

## FUTURE DEVELOPMENT

Additional future development is planned for a separate parcel (Parcel A) on the site following the initial gas station / c-store development. It is currently unknown what this development would specifically include but it is likely to be a commercial use. The additional development would occur following the development on Parcel B but is anticipated it would be opened by 2026. Trip generation for this additional development was estimated based on potential uses and sizes using trip generation rates from ITE *Trip Generation* and other market studies. It was estimated that the future development could generate approximately 4,500 daily driveway trips with approximately 450 of those being weekday PM peak hour driveway trips.

For this future development, the trip distribution was estimated based on information for a market capture study for the project. Based on this information, it was estimated that 75 percent of vehicle trips would travel to/from

the north and the remaining 25 percent would travel to/from the south. These trip distribution percentages were used to assign the future development driveway trips to the site access to the determine future forecast volumes.

## WITH-PROJECT TRAFFIC FORECASTS

Parametrix evaluated traffic operations at the proposed development's site access for the following three scenarios:

1. 2023 with Proposed Development
2. 2026 with Proposed Development
3. 2026 Full Buildout (Proposed Development and Future Commercial)

The development of traffic volumes forecasts for each of these scenarios are discussed in the following sections.

### Scenario 1: 2023 with Proposed Development

This alternative evaluates the site access roundabout at the buildout year of the proposed project buildout. Future traffic volume forecasts were developed using data from a previous study: *SR-3 Bypass Modeling Memo* conducted by SCJ Alliance in 2019. From the study, PM peak hour existing volumes were taken from traffic counts at the Lake Flora Road/SR-3 intersection conducted in May 2019. The weekday PM peak hour was determined to be between 4:00 pm and 5:00 pm which coincides with a shift change at the local naval base.

To develop 2023 volumes, Parametrix took the 2019 existing volumes used in the study and grew the volumes by a growth rate of one percent per year, which was the same growth rate assumed in the study for the PM peak hour based on historic traffic volume growth patterns in the area.

Using the base 2023 traffic volumes, the proposed project's trip assignment (Figure 3) was added to develop the 2023 with-project volumes. These traffic volumes are shown in Figure 4.



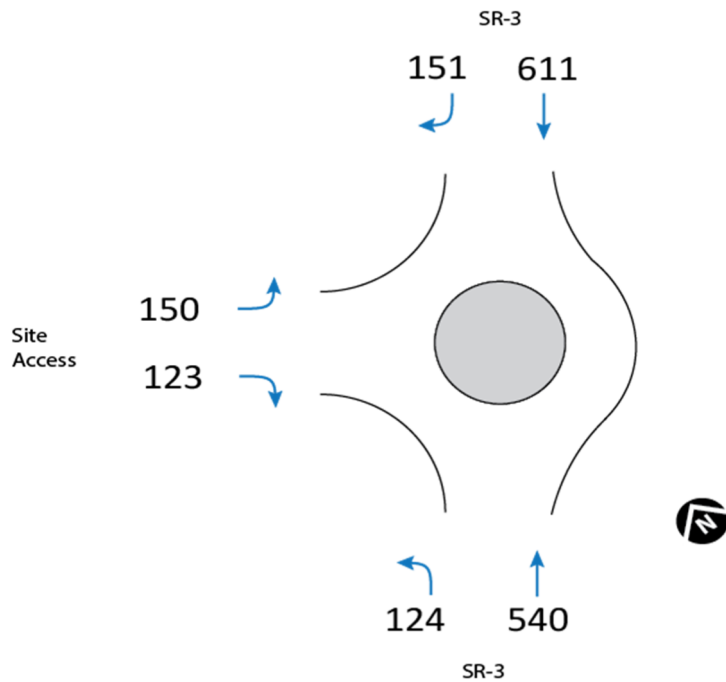


Figure 4. 2023 Weekday PM Peak Hour with Proposed Development

### Scenario 2: 2026 with Proposed Development

The SCJ Alliance study also developed 2025 forecasts for the Lake Flora Road/SR-3 intersection which included projected growth from the PSIC (Puget Sound Industrial Center) to the north, as well as projected development near Log Yard Road to the south outside of Belfair. Parametrix used the 2025 volumes from the study and applied a one percent growth rate to arrive at 2026 base volumes.

After developing the 2026 base volumes, Parametrix added the projected trips from the proposed development to the base volumes to arrive at projected 2026 forecast volumes for the site access. These traffic volumes are shown in Figure 5.

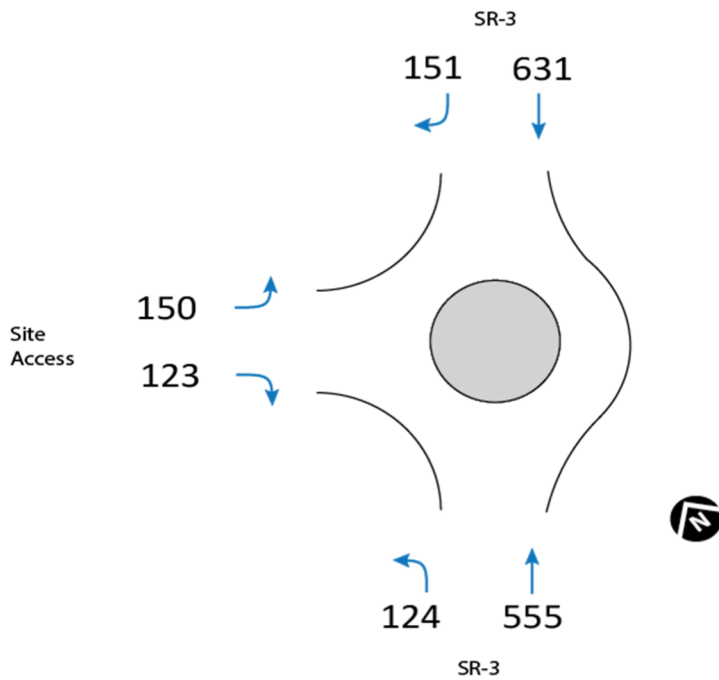


Figure 5. 2026 Weekday PM Peak Hour with Proposed Development

### Scenario 3: 2026 Full Buildout (Proposed Development and Future Commercial)

This scenario was developed to evaluate the performance of the site access roundabout following the full buildout of the site on both Parcel A and Parcel B. The trip assignment for the future commercial development on the site were added to the traffic volumes which were developed for Scenario 2 to develop the Scenario 3 weekday PM peak hour traffic volumes. These traffic volumes are shown in Figure 6.

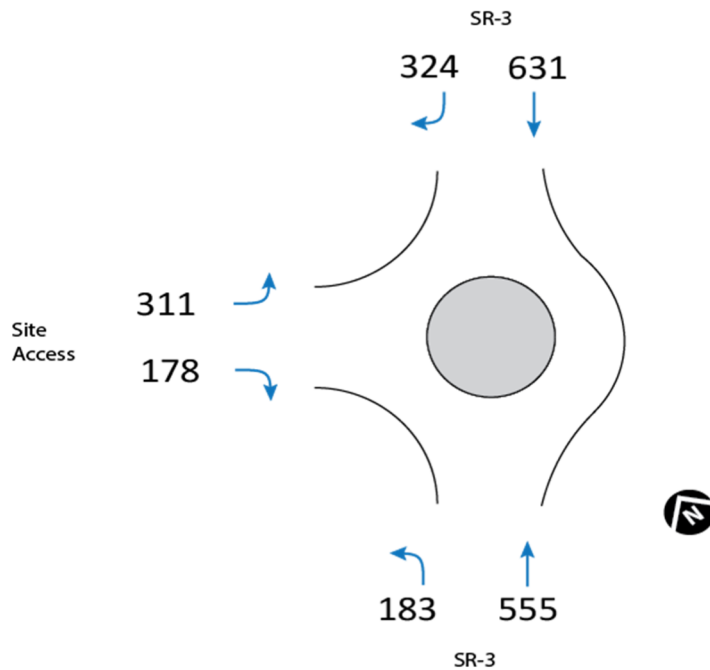


Figure 6. 2026 Full Buildout (Proposed Development and Future Commercial)

## TRAFFIC ANALYSIS

Parametrix analyzed the traffic operations at the proposed roundabout on SR-3 for the Skokomish site access for each of the three scenarios which traffic volumes were developed. As previously described, the roundabout would include a single circulating lane with single-lane entries to the roundabout on all approaches. Right-turn slip lanes would be provided for the southbound and eastbound right-turns to allow vehicles on those approaches to bypass the roundabout.

### Traffic Operations Methodology

Parametrix utilized the traffic analysis program SIDRA 9 to evaluate the intersection as a roundabout configuration. Parametrix used WSDOT SIDRA Policy Settings for all roundabout analysis at the site and as the roundabout has been conceptually designed, attributes such as circulating widths, lane entry widths and angles, and inscribed diameters were used from the design. SIDRA supports several methodologies for roundabout analysis including the SIDRA standard roundabout model as well as the roundabout methodologies contained in version 6 of the Highway Capacity Manual (HCM). Parametrix followed the WSDOT policy which specifies that the SIDRA standard methodology is used. A peak hour factor of 0.92 was used for all analysis alternatives to account for peaks in traffic levels that may occur during the peak hour.

Roundabouts operate on the yield-on-entry principle. Thus, roundabout approach delay is dictated by the ability of drivers to find gaps in the circulating traffic stream. This, in turn, is influenced by the volume of circulating vehicles at a roundabout approach, the number of approach lanes and circulating lanes, the roundabout geometry, and to some extent, the turning patterns of vehicles from the other roundabout approaches.

Traffic analysis of traditional intersections generally uses level of service (LOS) on an A to F scale to determine how well an intersection operates. For roundabout analysis, WSDOT also recommends placing importance on several other measures of effectiveness such as V/C, delay and queue lengths, in addition to LOS when evaluating a roundabout.

### Level Of Service

Level of service (LOS) is defined as how well an intersection or road operates based on levels A through F. LOS A represents the best operating conditions and LOS F the worst. Typically, LOS C or D service flow rates are used as minimally acceptable standards in order to ensure acceptable traffic operations.

- A – free flow operation
- B – reasonably unimpeded operation
- C – stable operation
- D – small increases in flow may cause substantial delay
- E – operates with significant delays
- F – operates with extremely slow speeds and/or intersection failures

Table 3 illustrates the LOS definitions for stop-sign controlled (unsignalized) intersections, which includes roundabout intersections.

**Table 3. LOS Criteria for Intersections**

Level of Service	Stop-Controlled Intersection Approaches Average Control delay (seconds/vehicle)
A	0 – 10
B	> 10 – 15
C	> 15 – 25
D	> 25 – 35
E	> 35 – 50
F	> 50

Source: Highway Capacity Manual (HCM) 6<sup>th</sup> Edition, Transportation Research Board National Research Council, Washington D.C., 2016.

Unlike stop-controlled and signalized intersections, roundabout performance is not dictated by a single Level of Service (LOS) measure. Instead, analysts should evaluate the detailed performance for all approaches. Failing conditions on any single approach triggers a failing LOS for the entire roundabout. This is because vehicles arriving at a roundabout are not guaranteed service time like at a signal or an all-way stop intersection. For example, an approach at a signal has dedicated green time and is guaranteed to eventually be served no matter the congestion level. Roundabout approaches, on the other hand, are entirely dependent on whether there are gaps in the circulating traffic stream. Thus, one roundabout approach can completely fail while the remaining approaches experience very little delay.



## Roundabout Analysis

Parametrix conducted an analysis using SIDRA analysis software to determine the capacity and level of service of a roundabout configuration at the proposed Skokomish site access. The roundabout is at concept design stage, as shown in Figure 2, as a single-lane roundabout with a single lane approach in all directions and an added right-turn slip lane southbound and an added right-turn slip lane eastbound. Table 4 details PM peak hour LOS, vehicle delay, and the volume demand to capacity ratio (V/C) for each approach and for the overall intersection for each of the three alternatives. Detailed SIDRA worksheets are included in Attachment A. For the roundabout analysis, overall roundabout V/C and average delay are reported for the worst approach.

**Table 4. Weekday PM Peak Hour Analysis – Skokomish Development Site Access**

PM Peak Hour		SIDRA Results					
		Scenario 1: 2023 Proposed Development (Parcel A)		Scenario 2: 2026 Proposed Development (Parcel A)		Scenario 3: 2026 Full Buildout	
Roadway/Approach		V/C	Average Delay (sec) (LOS)	V/C	Average Delay (sec) (LOS)	V/C	Average Delay (sec) (LOS)
SR-3	NB	0.59	6 (A)	0.54	5 (A)	0.67	8 (A)
	SB	0.48	4 (A)	0.44	4 (A)	0.46	4 (A)
Site Access Road	EB	0.16	10 (A)	0.14	10 (A)	0.30	10 (B)
Overall Intersection		0.58	6 (A)	0.54	5 (A)	0.67	7 (A)

As shown in Table 4, the roundabout during 2023 conditions with the proposed development operates with a V/C of 0.58, average delay of 6 seconds and operates at LOS A. During the 2026 conditions with the proposed development, the roundabout is anticipated to operate with a V/C of 0.54 and LOS A. A slight improvement in traffic operations is observed between the 2023 and 2026 scenarios due to the decrease in the environmental factor from 1.1 to 1.0 which accounts for drivers becoming more comfortable with the control device. Following full buildout of the site in 2026 with the adjacent commercial development, the roundabout is anticipated to operate at a V/C of 0.67, with an average of 7 seconds delay and at a LOS A.

For each of the three alternatives, the highest V/C ratio is on the northbound approach during the weekday PM peak hour. By the 2026 full buildout scenario, it is anticipated that the northbound approach would operate with a V/C of 0.68 during the weekday PM peak hour, which is still below full capacity. Average vehicle delay remains low for the approach and the V/C is low on the other roundabout approaches.

The 95<sup>th</sup> percentile queues for the northbound approach reach approximately 180 feet with 2026 full buildout alternative during the weekday PM peak hour. However, roundabout queues are moving queues, which are not perceived to be as negative as static signal queues, and these queue lengths should not negatively affect the nearest intersection to the south at SW Lake Flora Road, or the surrounding transportation network. 95<sup>th</sup> percentile queues for the eastbound approach coming out of the Skokomish site are all less than 100 feet for each of the three alternatives during the PM peak hour, thus, it is unlikely that these queues would have an effect

on internal site circulation. The 95<sup>th</sup> percentile queue at the 2026 full buildout for the southbound right-turn slip lane into the site is approximately 50 feet.

Pedestrian crossings will be implemented into the design of the roundabout. The roundabout would include refuges for people walking and bicycling between the entry and exit lanes on the legs with multi-lane approaches or egresses. It is anticipated that there will be minimal pedestrian activity at the roundabout site, as there is no current bicycle or pedestrian facilities along SR-3. The proposed development will likely not generate new pedestrian/bicycle activity as the speed and nature of the highway will deter pedestrian or bicycle trips to and from the Skokomish site. An enhanced active transportation trail is planned along the western frontage of SR-3 and the roundabout which would facilitate walking and bicycling to and through the proposed development and would allow for connectivity to any future active transportation facilities along SR-3. Even with the construction of an active transportation trail, it is anticipated that pedestrian and bicycle activity will have little to no impact on operations at the roundabout.

## SAFETY

Parametrix obtained crash data from WSDOT on SR-3 near the Skokomish site access for a 5-year period, between January 1, 2016 and December 31, 2020, as summarized in Table 5. Crashes within one-half mile of the site access were analyzed from milepost 28.65 to 29.65, including those that occurred at the Lake Flora Road/SR-3 intersection which lies approximately 2,000 feet to the south.

There were 44 total crashes on SR-3 over the five-year period within a half-mile of the project site which includes the Lake Flora Road intersection. There was one fatal crash and two serious injury crashes and 12 minor or possible injury crashes. The most common crash types were angle (15 crashes), and run-off roadway/rollover (13 crashes). Of all the crashes reviewed, 23 of the 44 total crashes occurred at the Lake Flora Road/SR-3 intersection, including 12 of the 15 angle crashes. Table 5 shows a summary of crashes on SR-3 the last five years including crash severity and manner of collision. Crashes that occurred at the Lake Flora Road / SR-3 intersection are broken out separately for comparison.

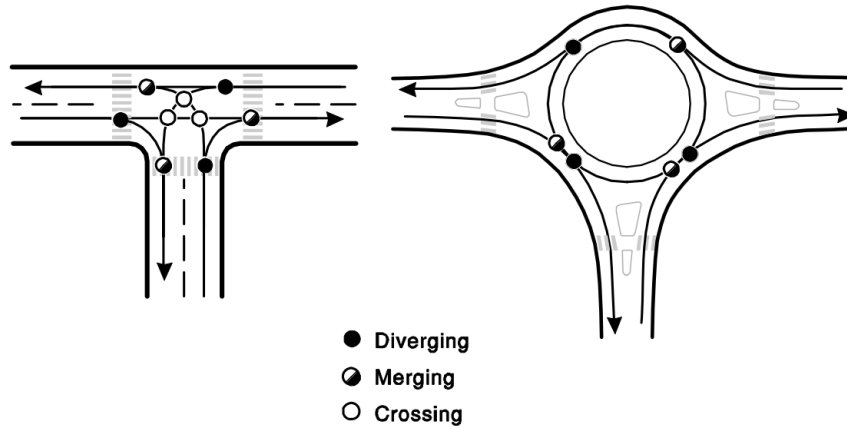
**Table 5: SR-3 Crash Summary**

Year	Total Crashes	Crash Severity				Manner of Collision							
		Fatal	Ser. Injury	Minor Poss. Injury	PDO <sup>1</sup>	Head On	Angle	Side-swipe	Rear-End	Run Off Road	Fixed Object	Wild Animal	Ped/Cyclist
2016	10	0	1	2	7	1	3	1	0	4	1	0	0
2017	11	1	0	3	7	2	6	0	1	2	0	0	0
2018	7	0	0	2	5	0	1	1	1	3	1	0	0
2019	10	0	1	3	6	0	3	2	2	3	0	0	0
2020	6	0	0	2	4	0	2	0	0	1	1	2	0
<b>Total</b>	<b>44</b>	<b>1</b>	<b>2</b>	<b>12</b>	<b>29</b>	<b>3</b>	<b>15</b>	<b>4</b>	<b>4</b>	<b>13</b>	<b>3</b>	<b>2</b>	<b>0</b>
<b>Lake Flora Int.</b>	<b>23</b>	<b>0</b>	<b>2</b>	<b>8</b>	<b>13</b>	<b>2</b>	<b>12</b>	<b>1</b>	<b>2</b>	<b>4</b>	<b>2</b>	<b>0</b>	<b>0</b>

1. PDO = Property Damage Only

A three-legged roundabout has six total conflict points, which is a reduction from a typical tee-intersection which has six total conflict points. whereas a typical tee-intersection has nine (see Figure 7). The geometric design of roundabouts also eliminates crossing conflicts; therefore, the more severe “failure to stop”, and high-speed right-angle crashes which are common with traditional four-leg and three-leg intersections are mitigated with a

roundabout. Based on Crash Modification Factors, by designing the Skokomish site access intersection as a roundabout configuration, the frequency and severity of crashes could be reduced compared to a traditional stop-controlled or signal-controlled intersection. At the Lake Flora Road intersection with SR-3, WSDOT is proposing to build a mini roundabout to enhance the safety at this intersection due to the high frequency of crashes that have occurred at it. This roundabout could be constructed and open for use by the end of 2023.



Source: NCHRP 672, Exh 5-1

Figure 7. Vehicle Conflict Point Comparison for Single-Lane Approach Intersections

## SUMMARY / CONCLUSIONS

This analysis evaluated a roundabout configuration at the proposed Skokomish development access on SR-3, located north of Belfair. The development would construct a gas station with 16 vehicle fueling positions, a 10,000 square foot c-store and an attached 5,000 square foot liquor store and is anticipated to be constructed by 2023. The proposed development is expected to generate approximately 550 driveway trips including 360 trips during the weekday PM peak hour.

The roundabout is anticipated to operate at acceptable volume-to-capacity ratios will operate with excess capacity and at an acceptable level of service during the PM peak hour through the horizon year 2026 with the development of the gas station/c-store/liquor store. Following full buildout of the site with additional commercial development, the roundabout will continue to operate at LOS A; with the northbound approach remaining below capacity during the PM peak hour with a maximum V/C ratio of 0.67. Average vehicle delay for the northbound leg at full buildout is minimal and queuing is not anticipated to affect the surrounding roadway network.

Eastbound 95<sup>th</sup> percentile queues at the roundabout for the eastbound approach coming out of the Skokomish site are all less than 100 feet for each of the three alternatives during the weekday PM peak hour, therefore it is not anticipated that these queues will interfere with the location of the gas station/c-store driveway. On the southbound approach, the 95<sup>th</sup> percentile queues are also anticipated to be less than 100 feet during the weekday PM peak hour at full buildout in 2026.

Traffic safety data near the site access was reviewed along SR-3 for the previous five-year period. Within one-half mile of the site to the north and south, there were 44 crashes in the previous five years with approximately half of these occurring at the SR-3 / Lake Flora Road intersection. As the site access will add an intersection to the roadway along with increased traffic volumes to the site, it is possible that collisions along the roadway could

increase. However, roundabouts typically have fewer collisions than a typical tee-intersection and collision types likely to be less severe due to the reduction of high-speed angle collisions that are common with rural / suburban stop-controlled intersection.



## Attachment A: SIDRA LOS Worksheets

# MOVEMENT SUMMARY

 **Site: 101 [2023 Skokomish Site & SR-3 - Parcel A (Site Folder: General)]**

New Site  
Site Category: (None)  
Roundabout

Vehicle Movement Performance														
Mov ID	Turn	INPUT VOLUMES		DEMAND FLOWS		Deg. Satn	Aver. Delay	Level of Service	95% BACK OF QUEUE		Prop. Que	Effective Stop Rate	Aver. No. Cycles	Aver. Speed
		[ Total veh/h	HV ] %	[ Total veh/h	HV ] %				[ Veh. veh	Dist ] ft				
South: SR-3														
3	L2	124	2.0	135	2.0	0.593	11.0	LOS B	4.9	125.4	0.53	0.51	0.53	36.4
8	T1	540	4.0	587	4.0	0.593	4.5	LOS A	4.9	125.4	0.53	0.51	0.53	36.2
Approach		664	3.6	722	3.6	0.593	5.7	LOS A	4.9	125.4	0.53	0.51	0.53	36.3
North: SR-3														
4	T1	611	4.0	664	4.0	0.476	3.9	LOS A	3.1	80.0	0.36	0.40	0.36	37.3
14	R2	151	2.0	164	2.0	0.115	4.1	LOS A	0.5	13.0	0.25	0.46	0.25	36.4
Approach		762	3.6	828	3.6	0.476	3.9	LOS A	3.1	80.0	0.34	0.41	0.34	37.2
West: Skokomish Site														
5	L2	150	2.0	163	2.0	0.159	12.5	LOS B	0.9	23.2	0.63	0.75	0.63	33.6
12	R2	123	2.0	134	2.0	0.130	6.3	LOS A	0.7	18.8	0.62	0.66	0.62	35.5
Approach		273	2.0	297	2.0	0.159	9.7	LOS A	0.9	23.2	0.62	0.71	0.62	34.4
All Vehicles		1699	3.4	1847	3.4	0.593	5.5	LOS A	4.9	125.4	0.46	0.50	0.46	36.3

Site Level of Service (LOS) Method: Delay & Degree of Saturation (SIDRA). Site LOS Method is specified in the Parameter Settings dialog (Site tab).

Roundabout LOS Method: Same as Signalised Intersections.

Vehicle movement LOS values are based on average delay and v/c ratio (degree of saturation) per movement.

Intersection and Approach LOS values are based on average delay for all movements (v/c not used).

Roundabout Capacity Model: SIDRA Standard.

Delay Model: SIDRA Standard (Geometric Delay is included).

Queue Model: HCM Queue Formula.

Gap-Acceptance Capacity: SIDRA Standard (Akçelik M3D).

HV (%) values are calculated for All Movement Classes of All Heavy Vehicle Model Designation.

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# MOVEMENT SUMMARY

 **Site: 101 [Skokomish Site\_SR-3 2026 Parcel A (Site Folder: General)]**

New Site  
Site Category: (None)  
Roundabout

Vehicle Movement Performance														
Mov ID	Turn	INPUT VOLUMES		DEMAND FLOWS		Deg. Satn	Aver. Delay	Level of Service	95% BACK OF QUEUE		Prop. Que	Effective Stop Rate	Aver. No. Cycles	Aver. Speed
		[ Total veh/h	HV ] %	[ Total veh/h	HV ] %				[ Veh. veh	Dist ] ft				
South: SR-3														
3	L2	124	2.0	135	2.0	0.544	10.8	LOS B	4.3	110.0	0.48	0.49	0.48	36.6
8	T1	555	4.0	603	4.0	0.544	4.2	LOS A	4.3	110.0	0.48	0.49	0.48	36.4
Approach		679	3.6	738	3.6	0.544	5.4	LOS A	4.3	110.0	0.48	0.49	0.48	36.4
North: SR-3														
4	T1	631	4.0	686	4.0	0.441	3.8	LOS A	2.7	70.4	0.32	0.39	0.32	37.5
14	R2	151	2.0	164	2.0	0.103	4.0	LOS A	0.5	11.5	0.23	0.46	0.23	36.5
Approach		782	3.6	850	3.6	0.441	3.8	LOS A	2.7	70.4	0.31	0.40	0.31	37.3
West: Skokomish Site														
5	L2	150	2.0	163	2.0	0.141	12.4	LOS B	0.9	22.0	0.64	0.73	0.64	33.6
12	R2	123	2.0	134	2.0	0.116	6.1	LOS A	0.7	17.8	0.63	0.64	0.63	35.4
Approach		273	2.0	297	2.0	0.141	9.6	LOS A	0.9	22.0	0.63	0.69	0.63	34.4
All Vehicles		1734	3.4	1885	3.4	0.544	5.3	LOS A	4.3	110.0	0.42	0.48	0.42	36.5

Site Level of Service (LOS) Method: Delay & Degree of Saturation (SIDRA). Site LOS Method is specified in the Parameter Settings dialog (Site tab).

Roundabout LOS Method: Same as Signalised Intersections.

Vehicle movement LOS values are based on average delay and v/c ratio (degree of saturation) per movement.

Intersection and Approach LOS values are based on average delay for all movements (v/c not used).

Roundabout Capacity Model: SIDRA Standard.

Delay Model: SIDRA Standard (Geometric Delay is included).

Queue Model: HCM Queue Formula.

Gap-Acceptance Capacity: SIDRA Standard (Akçelik M3D).

HV (%) values are calculated for All Movement Classes of All Heavy Vehicle Model Designation.

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# MOVEMENT SUMMARY

 **Site: 101 [Skokomish Site\_SR-3 2026 Full Buildout SBR (Site Folder: General)]**

New Site  
Site Category: (None)  
Roundabout

Vehicle Movement Performance														
Mov ID	Turn	INPUT VOLUMES		DEMAND FLOWS		Deg. Satn	Aver. Delay	Level of Service	95% BACK OF QUEUE		Prop. Que	Effective Stop Rate	Aver. No. Cycles	Aver. Speed
		[ Total veh/h	HV ] %	[ Total veh/h	HV ] %				[ Veh. veh	Dist ] ft				
South: SR-3														
3	L2	183	2.0	199	2.0	0.668	12.7	LOS B	6.8	175.3	0.75	0.71	0.82	35.4
8	T1	555	4.0	603	4.0	0.668	6.2	LOS A	6.8	175.3	0.75	0.71	0.82	35.3
Approach		738	3.5	802	3.5	0.668	7.8	LOS A	6.8	175.3	0.75	0.71	0.82	35.3
North: SR-3														
4	T1	631	4.0	686	4.0	0.462	4.0	LOS A	3.2	82.0	0.44	0.41	0.44	37.0
14	R2	324	2.0	352	2.0	0.232	4.2	LOS A	1.3	32.3	0.35	0.50	0.35	36.2
Approach		955	3.3	1038	3.3	0.462	4.1	LOS A	3.2	82.0	0.41	0.44	0.41	36.7
West: Skokomish Site														
5	L2	311	2.0	338	2.0	0.301	12.7	LOS B	2.1	53.1	0.72	0.79	0.72	33.4
12	R2	178	2.0	193	2.0	0.172	6.2	LOS A	1.1	28.3	0.67	0.68	0.67	35.3
Approach		489	2.0	532	2.0	0.301	10.4	LOS B	2.1	53.1	0.70	0.75	0.70	34.1
All Vehicles		2182	3.1	2372	3.1	0.668	6.8	LOS A	6.8	175.3	0.59	0.60	0.61	35.6

Site Level of Service (LOS) Method: Delay & Degree of Saturation (SIDRA). Site LOS Method is specified in the Parameter Settings dialog (Site tab).

Roundabout LOS Method: Same as Signalised Intersections.

Vehicle movement LOS values are based on average delay and v/c ratio (degree of saturation) per movement.

Intersection and Approach LOS values are based on average delay for all movements (v/c not used).

Roundabout Capacity Model: SIDRA Standard.

Delay Model: SIDRA Standard (Geometric Delay is included).

Queue Model: HCM Queue Formula.

Gap-Acceptance Capacity: SIDRA Standard (Akçelik M3D).

HV (%) values are calculated for All Movement Classes of All Heavy Vehicle Model Designation.

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## Appendix B

### Operations Analysis Results

# MOVEMENT SUMMARY

 **Site: 101 [2023 Skokomish Site & SR-3 - Parcel A (Site Folder: General)]**

New Site  
Site Category: (None)  
Roundabout

Vehicle Movement Performance														
Mov ID	Turn	INPUT VOLUMES		DEMAND FLOWS		Deg. Satn	Aver. Delay	Level of Service	95% BACK OF QUEUE		Prop. Que	Effective Stop Rate	Aver. No. Cycles	Aver. Speed
		[ Total veh/h	HV ] %	[ Total veh/h	HV ] %				[ Veh. veh	Dist ] ft				
South: SR-3														
3	L2	124	2.0	135	2.0	0.593	11.0	LOS B	4.9	125.4	0.53	0.51	0.53	36.4
8	T1	540	4.0	587	4.0	0.593	4.5	LOS A	4.9	125.4	0.53	0.51	0.53	36.2
Approach		664	3.6	722	3.6	0.593	5.7	LOS A	4.9	125.4	0.53	0.51	0.53	36.3
North: SR-3														
4	T1	611	4.0	664	4.0	0.476	3.9	LOS A	3.1	80.0	0.36	0.40	0.36	37.3
14	R2	151	2.0	164	2.0	0.115	4.1	LOS A	0.5	13.0	0.25	0.46	0.25	36.4
Approach		762	3.6	828	3.6	0.476	3.9	LOS A	3.1	80.0	0.34	0.41	0.34	37.2
West: Skokomish Site														
5	L2	150	2.0	163	2.0	0.159	12.5	LOS B	0.9	23.2	0.63	0.75	0.63	33.6
12	R2	123	2.0	134	2.0	0.130	6.3	LOS A	0.7	18.8	0.62	0.66	0.62	35.5
Approach		273	2.0	297	2.0	0.159	9.7	LOS A	0.9	23.2	0.62	0.71	0.62	34.4
All Vehicles		1699	3.4	1847	3.4	0.593	5.5	LOS A	4.9	125.4	0.46	0.50	0.46	36.3

Site Level of Service (LOS) Method: Delay & Degree of Saturation (SIDRA). Site LOS Method is specified in the Parameter Settings dialog (Site tab).

Roundabout LOS Method: Same as Signalised Intersections.

Vehicle movement LOS values are based on average delay and v/c ratio (degree of saturation) per movement.

Intersection and Approach LOS values are based on average delay for all movements (v/c not used).

Roundabout Capacity Model: SIDRA Standard.

Delay Model: SIDRA Standard (Geometric Delay is included).

Queue Model: HCM Queue Formula.

Gap-Acceptance Capacity: SIDRA Standard (Akçelik M3D).

HV (%) values are calculated for All Movement Classes of All Heavy Vehicle Model Designation.

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# MOVEMENT SUMMARY

 **Site: 101 [Skokomish Site\_SR-3 2026 Parcel A (Site Folder: General)]**

New Site  
Site Category: (None)  
Roundabout

Vehicle Movement Performance														
Mov ID	Turn	INPUT VOLUMES		DEMAND FLOWS		Deg. Satn	Aver. Delay	Level of Service	95% BACK OF QUEUE		Prop. Que	Effective Stop Rate	Aver. No. Cycles	Aver. Speed
		[ Total veh/h	HV ] %	[ Total veh/h	HV ] %				[ Veh. veh	Dist ] ft				
South: SR-3														
3	L2	124	2.0	135	2.0	0.544	10.8	LOS B	4.3	110.0	0.48	0.49	0.48	36.6
8	T1	555	4.0	603	4.0	0.544	4.2	LOS A	4.3	110.0	0.48	0.49	0.48	36.4
Approach		679	3.6	738	3.6	0.544	5.4	LOS A	4.3	110.0	0.48	0.49	0.48	36.4
North: SR-3														
4	T1	631	4.0	686	4.0	0.441	3.8	LOS A	2.7	70.4	0.32	0.39	0.32	37.5
14	R2	151	2.0	164	2.0	0.103	4.0	LOS A	0.5	11.5	0.23	0.46	0.23	36.5
Approach		782	3.6	850	3.6	0.441	3.8	LOS A	2.7	70.4	0.31	0.40	0.31	37.3
West: Skokomish Site														
5	L2	150	2.0	163	2.0	0.141	12.4	LOS B	0.9	22.0	0.64	0.73	0.64	33.6
12	R2	123	2.0	134	2.0	0.116	6.1	LOS A	0.7	17.8	0.63	0.64	0.63	35.4
Approach		273	2.0	297	2.0	0.141	9.6	LOS A	0.9	22.0	0.63	0.69	0.63	34.4
All Vehicles		1734	3.4	1885	3.4	0.544	5.3	LOS A	4.3	110.0	0.42	0.48	0.42	36.5

Site Level of Service (LOS) Method: Delay & Degree of Saturation (SIDRA). Site LOS Method is specified in the Parameter Settings dialog (Site tab).

Roundabout LOS Method: Same as Signalised Intersections.

Vehicle movement LOS values are based on average delay and v/c ratio (degree of saturation) per movement.

Intersection and Approach LOS values are based on average delay for all movements (v/c not used).

Roundabout Capacity Model: SIDRA Standard.

Delay Model: SIDRA Standard (Geometric Delay is included).

Queue Model: HCM Queue Formula.

Gap-Acceptance Capacity: SIDRA Standard (Akçelik M3D).

HV (%) values are calculated for All Movement Classes of All Heavy Vehicle Model Designation.

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# MOVEMENT SUMMARY

 **Site: 101 [Skokomish Site\_SR-3 2026 Full Buildout SBR (Site Folder: General)]**

New Site  
Site Category: (None)  
Roundabout

Vehicle Movement Performance														
Mov ID	Turn	INPUT VOLUMES		DEMAND FLOWS		Deg. Satn	Aver. Delay	Level of Service	95% BACK OF QUEUE		Prop. Que	Effective Stop Rate	Aver. No. Cycles	Aver. Speed
		[ Total veh/h	HV ] %	[ Total veh/h	HV ] %				[ Veh. veh	Dist ] ft				
South: SR-3														
3	L2	183	2.0	199	2.0	0.668	12.7	LOS B	6.8	175.3	0.75	0.71	0.82	35.4
8	T1	555	4.0	603	4.0	0.668	6.2	LOS A	6.8	175.3	0.75	0.71	0.82	35.3
Approach		738	3.5	802	3.5	0.668	7.8	LOS A	6.8	175.3	0.75	0.71	0.82	35.3
North: SR-3														
4	T1	631	4.0	686	4.0	0.462	4.0	LOS A	3.2	82.0	0.44	0.41	0.44	37.0
14	R2	324	2.0	352	2.0	0.232	4.2	LOS A	1.3	32.3	0.35	0.50	0.35	36.2
Approach		955	3.3	1038	3.3	0.462	4.1	LOS A	3.2	82.0	0.41	0.44	0.41	36.7
West: Skokomish Site														
5	L2	311	2.0	338	2.0	0.301	12.7	LOS B	2.1	53.1	0.72	0.79	0.72	33.4
12	R2	178	2.0	193	2.0	0.172	6.2	LOS A	1.1	28.3	0.67	0.68	0.67	35.3
Approach		489	2.0	532	2.0	0.301	10.4	LOS B	2.1	53.1	0.70	0.75	0.70	34.1
All Vehicles		2182	3.1	2372	3.1	0.668	6.8	LOS A	6.8	175.3	0.59	0.60	0.61	35.6

Site Level of Service (LOS) Method: Delay & Degree of Saturation (SIDRA). Site LOS Method is specified in the Parameter Settings dialog (Site tab).

Roundabout LOS Method: Same as Signalised Intersections.

Vehicle movement LOS values are based on average delay and v/c ratio (degree of saturation) per movement.

Intersection and Approach LOS values are based on average delay for all movements (v/c not used).

Roundabout Capacity Model: SIDRA Standard.

Delay Model: SIDRA Standard (Geometric Delay is included).

Queue Model: HCM Queue Formula.

Gap-Acceptance Capacity: SIDRA Standard (Akçelik M3D).

HV (%) values are calculated for All Movement Classes of All Heavy Vehicle Model Designation.

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# THE SUQUAMISH TRIBE

NATURAL RESOURCES DEPARTMENT  
PO Box 498 Suquamish, WA 98392-0498

8 April 2024

compplan@kitsap.gov  
Department of Community Development  
Planning and Environmental Programs  
614 Division Street, MS-36  
Port Orchard, WA 98366

SUBJECT: Draft Kitsap County Comprehensive Plan 2024

The Natural Resource Department of Suquamish Indian Tribe of the Port Madison Reservation appreciates the opportunity to review the Draft Kitsap County's Comprehensive Plan 2024. The area covered by the Comprehensive Plan update lies entirely within the Suquamish Tribe's aboriginal homeland and includes treaty reserved fishing areas and hunting and gathering areas. 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 territory,

As noted in the Tribe's comments upon the DEIS (a document to be read in concert with these comments), it is difficult to comment upon a plan when many of the environmental protection measures associated with the plan, such as increased stream buffers are proposals (Figure 1) and might not be adopted. A detailed description of that is contained in the Tribe's comments on the Draft Environmental Impact Statement. However, the Tribe believes there is insufficient information to support an expansion of the UGA or reclassification requests for parcels outside the existing UGA. There is sufficient land within the UGA and upzoning has not occurred to the extent possible. To develop these areas without comprehensive planning has the potential to create "sprawling" development, traffic problems and conflicts with adjacent rural residential development. The comprehensive plan should not include rural comprehensive plan amendments/upzones that increase rural population and employment capacity as this violates the GMA and not consistent with MPP-RGS-14 which reads:

*"Manage and reduce rural growth rates over time, consistent with the Regional Growth Strategy, to maintain rural landscapes and lifestyles and protect resource lands and the environment."*

Additionally, the County's aspiration to reduce (1) sprawl (such as Alternative 2) and (2) impacts upon the natural environment will be constrained by the large number of non-conforming lots in the rural areas - lots that the County currently allows to be developed. Many of the owners are not innocent owners or purchasers, but people that purchased or will purchase these lots knowing critical areas existed on or adjacent to these properties. If a large number of applications to develop such lots are submitted, this could result in urban densities in the county's rural areas. This scale of development is contrary to the areas designated under the Growth Management Act and the County's Comprehensive Plan. The issue of these small legacy lots is compounded by Accessory Dwelling Units (ADUs). Take for example, a legacy lot of 1.0 acre in a region zoned 1 DU/5 acres if the owner requests to construct an ADU. The resulting effective density is 2

DU/acre. This is not a rural density, but an urban density and violates the GMA and is not consistent with Vision 2050 MPP-RGS-11 or MPP-RGS-12 which require the County to:

*“MPP-RGS-11 Encourage growth in designated countywide centers.”*

and

*“MPP-RGS-12 Avoid increasing development capacity inconsistent with the Regional Growth Strategy in regional geographies not served by high capacity transit.”*

The County must address these issues, particularly, since (1) the DEIS Alternative 2 does not in many cases increase stream buffers to those currently deemed by Best Available Science as needed to protect stream function; and (2) though the Critical Areas Ordinance Update 2024 **proposes** increases in stream buffers, the proposed buffer widths for Type N streams are generally half the width as called for by Best Available Science and only meet the base minimum width to meet the pollution removal function.

Non-conforming lots are a frequent source of requests for RUE or variances resulting in buffer reductions and failing to deal with this issue reduces environmental protections as smaller lots have less opportunity to avoid critical areas or their buffers.

Potential measures to deal with this legacy issue include, but are not limited to policies that require the ultimate landowner (to avoid adjacent lots be owned by multiple companies controlled by the same entity) to aggregate adjacent lots to extent possible to bring substandard lots to conforming status in terms of size. Additionally, when variances to buffer requirements are sought, the Special Reports must quantitatively describe buffer impacts and proposed mitigation, and the time required for the mitigation to achieve the same values and functions prior to the disturbance.

In regard to lot aggregation or lack of, the Tribe opposes Land Use Strategy 16.e. found on page 52 to *“Remove lot aggregation requirements in all Type 1 LAMIRDS to diversify housing types. (Alternative 3 only).”* Though currently worded for Alternative 3, the Board can mix and match from the alternatives, so the proposal could be carried forward into Alternative 2. The Tribe also opposes Suquamish Strategy 6.a to *“Allow accessory dwelling units to be permitted uses in Suquamish residential zones. (Alternative 2 only).”* Both proposals would result in increased density in areas where density is not to be focused and is a violation of the GMA.

The GMA requires that the County plan for annexation and incorporation of urban areas within a 20 year timeframe so that in the long-term, cities provide urban services and counties provide rural and regional services. The County’s Land Use Policy 13.1 to *“Facilitate and encourage urban areas to annex to associated cities or incorporate over the 20-year planning period and ensure compatibility of development with future planned uses”* acknowledges that. Yet, the County continues to expend funds supporting UGAs (Silverdale and Kingston) significantly past that 20 year timeframe. Furthermore, the Draft Plan provides no path forward for incorporation for Kingston or Silverdale.

Page 37 of the Draft Plan states in regard to the Kingston UGA, *“The community will explore incorporation during the planning period but may be limited by population and revenue opportunities.”* Page 79 of the Draft Plan states, *“Silverdale is also anticipated to incorporate as*

*a city later in the planning period.” This are aspirational goals, however the intent of “MPP-RGS-16 Identify strategies, incentives, and approaches to facilitate the annexation or incorporation of unincorporated areas within urban growth areas into cities” is not aspirational, but clear guidance cities, not the County, should be providing these services. The Comp Plan needs to set out a path with implementation deadlines for incorporation.*

The Tribe believes the County has excluded certain options to reduce the expansion of the UGA. Page 14 of the Plan states, *“Future population growth is accommodated by the capacity of residential units”* and page 82 notes, *“Kitsap County must plan for and accommodate 14,498 permanent housing units from 2020 through 2044, plus 612 emergency housing beds for persons experiencing homelessness.”*

Page 15 reads:

*“In developing and analyzing its three alternatives, Kitsap applied different assumptions based upon the goals of each alternative (e.g., greater densities and land use intensities in urban centers in Alternative 2, greater critical area buffers and tree retention requirements in Alternative 3).”*

This is followed by the statement on page 94:

*“Housing Strategy 2.e. Use the Land Capacity Analysis to ensure zoned capacity is available for middle housing types in unincorporated urban growth areas where housing growth is anticipated. Specific tools may include **lifting density minimums** or establishing density bonuses when middle housing types are proposed.”*

However, the County appears to have made a conscious decision to limit building height and densities urban centers to less than found in Bremerton. This might be the result of a desire to maintain views, local character as much as possible, *etc.*, and in terms of height constraints upon the ability of firefighting equipment. Explicit and implicit assumptions and constraints on building height (which for multi-family housing affects density) must be thoroughly described in the Comp Plan and note (1) why those assumptions and constraints cannot or should not be removed to encourage more housing in urban centers; and (2) how much additional growth could occur in urban centers or urban like centers such as Silverdale and Kingston if the constraints were relaxed.

For example, the County should conduct an analysis assuming densities within existing urban and urban-like centers to those similar to those allowed by the City of Bremerton. The City for some areas as well as it R-40 zone has a minimum density of 18 DU/Ac extending up to 40 DU/Ac. This analysis would provide input as to how much housing could be put into these areas and counter the perceived need to expand the UGA, until there is a documented need to expand the UGA.

Page 2 of the Draft Comp Plan contains the following Land Acknowledgment:

*“Kitsap County is located on 396 square miles of land within the ancestral territory of the suq`abs. “People of Clear Salt Water” (Suquamish Tribe) and the Nux Sklai Yem “the Strong People” (Port Gamble S’Klallam Tribe). The Suquamish people live in harmony with the lands and waterways along Washington’s Central Salish Sea as they have for thousands of years. The Port Gamble S’Klallam people are the descendants of*

*the Salish people who have been well established in the Puget Sound basin and surrounding areas since 2400 B.C. In Kitsap County, the Suquamish and the Port Gamble S'Klallam people live on and protect the land and waters of their ancestors for future generations as guaranteed by the Point Elliot Treaty of 1855. In addition, the Treaty of Point No Point of 1855 ensures that the Jamestown S'Klallam, Skokomish, and Chimakum People maintain their hunting, fishing, and gathering rights on "usual and accustomed" grounds which include land and waterways within Kitsap County. With a deep historical connection and legacy of respect for the land and natural resources, these Tribal nations enrich Kitsap County through environmental stewardship, cultural heritage, and economic development, as well as collaboration with local governments to shape Kitsap County's future."*

The Suquamish Tribe requests that the County strike this land acknowledgement from the entire Comp plan. It is not legally or factually accurate and differs from versions that had been discussed in the past. Any future land acknowledgments must be created in consultation with the Suquamish Indian Tribe to ensure its accuracy and that it does not misstate facts or the treaties.

Specific comments on the Comp Plan are found in the attached Table.

Thank you for the opportunity to comment on this scoping notice. The Tribe looks forward to working with the County to help the County better understand the Tribe's concerns. If you have any questions, please contact me directly at 360-394-8449.

Sincerely,

Roderick Malcom  
Biologist  
Suquamish Tribe



The Table below contains comments on specific sections of the Comp Plan. Many of these comments, even is not marked as so, apply to other sections of the Draft Comp Plan.

Draft Comp Plan page number	Draft Comprehensive Plan narrative (bold emphasis added)	Comment
11	The Land Use Element's intent is to direct the majority of growth toward urban areas, provide greater distinction between urban and rural areas, guide land use patterns to allow for the efficient provision of urban services such as sewers and transportation systems, preserve open space, recognize and preserve historical and archaeological resources, and ensure compatibility between adjacent zones.	<p>This summarized intent does not reference protection of critical areas, but integration of growth with critical areas is a key aspect of the GMA. WAC 365-196-485 reads:</p> <p><i>1e Because the critical areas regulations must be consistent with the comprehensive plan, each comprehensive plan should set forth the underlying policies for the jurisdiction's critical areas program.</i></p> <p><i>1(f) In pursuing the environmental protection and open space goals of the act, such policies should identify nonregulatory measures for protecting critical areas as well as regulatory approaches. Nonregulatory measures include, but are not limited to: Incentives, public education, and public recognition, and could include innovative programs such as the purchase or transfer of development rights. When such policies are incorporated into the plan (either in a separate element or as a part of the land use element), the consistency of the regulations can be readily assessed.</i></p> <p><i>3(d) The review of existing designations during the comprehensive plan adoption process should, in most cases, be limited to the question of consistency with the comprehensive plan, rather than a revisiting of the entire prior designation and regulation process; however, counties and cities must address the requirements to include the best available science in reviewing designations and developing policies and development regulations to protect the functions and values of critical</i></p>

		<i>areas, and give special consideration to conservation or protection measures necessary to preserve or enhance anadromous fisheries. To the extent that new information is available or errors have been discovered, the review process must take this information into account unless the jurisdiction provides a reasoned, science-based justification for departure.</i>
31	Land Use Policy 1.3. Manage and maintain the County’s Official Zoning Map to ensure continued consistency with the Future Land Use Map (see Figure 1.1).	<p>To help with the policy, the County requires an accurate map of lands that already have urban services to focus growth there, when expansion is warranted.</p> <p>Additionally , the Comp Plan and the DEIS put great emphasis on the CAO to protect critical areas, yet the County’s Critical Area Maps are out of date, not regularly updated, and cannot be relied upon to support Environmental Policy 2.4, Environmental Policy 2.b. See comments to page 74 for more details.</p> <p>A Land Use Policy that requires DCD to manage and maintain the CAO maps to ensure they reflect the most recent information is required.</p> <p>Additionally, prior to adopting this Comp Plan, the County should review all existing Special Reports, stream type reports, <i>etc.</i>, and revise the Critical Area Maps as necessary to implement Environment Policy 2.4 which reads (emphasis added):</p> <p><i>“When considering expanding an urban growth area, <b>avoid including lands that contain large amounts of mapped critical areas.</b>”</i></p> <p>Going into the future, this would also reduce surprises for applicants and help ensure County staff are aware of key information when reviewing projects.</p>

		For potential benefits to applicants, see comments to page 61 of the Comp Plan (Economic Development Policy 2.5).
31	Land Use Policy 2.3. Reduce stormwater runoff.	<p>Clarification as to the intent of this policy would be helpful. For example, does reduce stormwater runoff mean reduce the total volume of stormwater runoff generated over the year, reduce peak flow, or something else.</p> <p>Additionally, infiltrating water is mentioned in the context of specific plans, but not in the context of reducing impacts to groundwater recharge on an increasing scales from sub-basin through basin to county wide. This is a key oversight given declining flows in many streams in Kitsap County and the expectation of even greater declines due to climate change.</p>
34	Land Use Goal 7. Historic, archaeological, and cultural resources	<p>Suggesting adding a new Land Use strategy:</p> <p><i>”Conduct early coordination with affected Tribes prior to issuing Notices of Applications or Threshold Determinations, or making an Administrative Decision.”</i></p>
45	Land Use Goal 14. Direct development to UGAs	<p>Suggest adding a new Land Use Goal:</p> <p><i>“Ensure consistency between the assumptions contained in the County’s Land Capacity Analysis, Buildable Lands data, Countywide Planning Policies, Comprehensive Plan, Critical Areas Ordinance, Stormwater Ordinance, and Shoreline Master Program..”</i></p>
47	The County has adopted a Critical Areas Ordinance which <b>protects</b> wetlands, fish and wildlife habitat conservation areas, geologically hazardous areas, frequently flooded areas, and critical aquifer recharge areas from the impacts of development and people from the consequences of developing in	<p>This wording implies a much stronger belief in the efficacy of the CAO that warranted. Though the Critical Areas Ordinance can reduce the impacts from development to Critical Areas, it cannot prevent alterations to ecological functions and values that existed before development, particularly if there is an intrusion into less disturbed buffers. This</p>

	unsuitable areas.	is because land development, as practiced today, is incompatible with the achievement of sustainable ecosystems. Unless development methods are adopted that cause significantly less disruption of ecological functions and values, the cycle of new development followed by impairment will continue.
47	The County has also adopted an ordinance for its Shoreline Master Program which protects shorelines based on preferred and existing patterns of development	<p>It should be noted and decision makers made aware that buffers under the SMP are typically less than those under the CAO and thus even less protective of the natural environment.</p> <p>The WDFW on page 14 of Riparian Ecosystems, Volume 2: Management Recommendations, highlighting the weakness of many SMP, write“:</p> <p><i>"To achieve that end, WDFW recommends local jurisdictions designate riparian areas and provide the same levels of protection for them within the SMA jurisdiction areas as they do under GMA</i></p>
47	access to recreation,	Suggest amending to read “access to <i>nature based passive</i> recreation”, otherwise some may construe this to include sports complexes, game centers, etc.
62	Economic Development Policy 2.5. Promote a balance between economic growth and protection of Kitsap County’s environmental assets and rural character.	It would help, particularly for small business if the County’s publicly accessible CAO database was kept current so people making decisions to site small rural based business are not surprised during an application for a permit to discover Critical Areas that could have influenced earlier decisions.
69	The following GMA planning goal directly addresses the environment: “Protect the environment and enhance the st’te’s high quality of life, including air and water quality, and the availability of water.”	<p>The Draft Comp Plan and the current CAO, SMP, Stormwater Ordinance do not achieve the enhance part, but cater to a slow decline. See the Tribe’s comments the DEIS for details.</p> <p>The Growth Management Act requires water quantity policies and regulations as</p>



		<p>part of the 2024 comprehensive plan and development regulations update. These provisions will help protect senior water rights holders (Tribe) and protect streamflows to aid in salmon and steelhead recovery, a requirement under WAC 365-196-485:</p> <p><i>(d) RCW <b>36.70A.070</b> (1) requires counties and cities to provide for protection of the quality and quantity of ground water used for public water supplies in the land use element. Where applicable, the land use element must review drainage, flooding, and stormwater runoff in the area and in nearby areas, and provide guidance to mitigate or cleanse those discharges that pollute waters of the state, including Puget Sound or waters entering Puget Sound.</i></p>
70	<p>In 2018, Kitsap County began working with the Washington Environmental Council, Port Gamble S'Klallam Tribe, and Suquamish Tribe to develop the natural asset management program. This new management program defines baseline levels of service or functional conditions of forest cover, streams, and shorelines and aims to develop goals or desired level of service for each asset. The desired levels of service will help guide investments and prioritization of actions to restore and protect natural systems. In addition, County staff continue to explore further implementation of the program into County planning.</p>	<p>The aspirational aspects of this program are counterbalanced by the insufficient protections to streams, riparian areas, wetlands, groundwater offered by County code. In addition, the priorities identified in this program do not necessarily reflect Tribal priorities.</p>
70	<p>Kitsap County works with area Tribes, agencies, and other groups to protect important natural environments <b>prioritized by tribal treaty rights.</b></p>	<p>The statement “<i>prioritized by tribal treaty rights</i>” is vague and the meaning is unclear. The County should clarify what is meant. See also comments to page 123 and 151.</p>

71	Low Impact Development is a stormwater and land-use management strategy that tries to <b>mimic natural hydrologic conditions</b> using practices such as bio-retention, rain gardens, permeable pavements, minimal excavation foundations, vegetated roofs, and rainwater harvesting.	<p>An analysis is required prior to implementing purported LIDs as many sites are not able to accommodate due to infiltration limitations.</p> <p>Additionally, unless there is an analysis that quantitatively shows the development does not result in a loss of infiltration volume over the water year, then even a project considered to be LID cannot be construed to mimic natural hydrologic conditions and thus is lower impact, not low impact.</p>
71	Best Available Science Under the state Growth Management Act (GMA), local governments are required to use the best available science in their policies and regulations on critical areas. Best available science means current scientific information used in the process to designate, protect, or restore critical areas, that is derived from a valid scientific process as defined by the Washington Administrative Code.	<p>The explicit and implicit stream buffers in the Comp Plan and associated DEIS have restricted the use of the most current riparian Best Available Science to pollutant removal for type N streams . The BAS for other functions such as wood recruitment, shading, <i>etc.</i>, have been overlooked or excluded</p> <p>See the Tribe’s comments to the DEIS for concerns.</p> <p>The WDFW most recent document<sup>1</sup> on riparian buffers, a document that is considered Best Available Science, states emphatically on page 4 (emphasis added):</p> <p><i>“Restoration of riparian ecosystems is critically important because legacy of environmental impacts resulting from the ways land use has affected riparian areas over the past 200 years. In other words, what <b>remains available for protection is not enough to provide the full functions and values Washington’s fish and wildlife need.</b>”</i></p> <p>It is clear, that in most cases stream buffers that are less than a Site Potential</p>

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<sup>1</sup> Rentz, R., A. Windrope, K. Folkerts, and J. Azerrad. 2020. Riparian Ecosystems, Volume 2: Management Recommendations. Habitat Program, Washington Department of Fish and Wildlife, Olympia.

		Tree Height (SPTH which is approximately 200 feet in width throughout most of Kitsap County) are inadequate to protect fish and wildlife.
71	No Net Loss is a standard that ensures new developments do not introduce new impacts that decrease ecological functions. If impacts do occur, projects must mitigate those impacts to demonstrate no net loss.	<p>This is an incorrect reading. The current No Net Loss guidance allows for net loss if that loss is eventually compensated. This means there can be a net loss over a considerable period as indicated on page 10 of Department of Ecology’s “<i>Shoreline No Net Loss and Mitigation Guidance for local governments Shorelands</i>”, dated May 2023, which though written for the SMA is applicable to all developments, states:</p> <p><i>“Rectifying and replacing lost functions can take time, and there will often be lag time between when a mitigation plan is implemented and when all lost shoreline ecological functions return”</i></p> <p>Additionally, the NNL goal differs from the implied net gain found elsewhere in the Comp Plan such as that found on page 72 (emphasis added):</p> <p>Environment Goal 1. Ecosystems and Habitat</p> <p><i>Protect and <b>enhance</b> the health, resilience, functions, and processes of natural environments and ecosystems, including</i></p>
72	Environment Strategy 1.d. Use the Kitsap Natural Resource Asset Management Program and other planning mechanisms to assess the potential impacts of higher intensity land uses and development in ecologically sensitive and critical areas.	<p>The location of many critical areas and the correct stream type for many streams is unknown. As noted elsewhere, the County must have this information to assess potential impacts. Desktop review is a helpful first step, but does not replace site visits to verify onsite conditions.</p> <p>Additionally, this is where the incorporation of information from the Special Reports prepared for adjacent areas would be helpful in suggesting potential gross errors in regard to the</p>

		location of critical areas.
73	Environment Strategy 1.j. Develop and adopt a salmon and ecosystem recovery plan for Kitsap County that guides funding and implementation of restoration and protection projects and programs using the Kitsap Natural Resource Asset Management Program and salmon and ecosystem recovery plans from Hood Canal Coordinating Council and West Sound Partners for Ecosystem Recovery.	<p>This should be extended to include the habitat assessments the WDFW have done (<a href="https://wdfw.wa.gov/sites/default/files/publications/00734/wdfw00734.pdf">https://wdfw.wa.gov/sites/default/files/publications/00734/wdfw00734.pdf</a>.) In addition the Comp Plan should mention the shoreline inventory documents as well as completed watershed plans.</p> <p>Additionally, the County should adopt the WDFW riparian guidelines as found in “Riparian Ecosystems, Volume 2: Management Recommendations (Volume 2) (Rentz et al. 2020)”, which are based upon the Best Available Science document, “Riparian Ecosystems, Volume 1: Science Synthesis and Management Implications (Volume 1) (Quinn et al. 2020)”, also prepared by the WDFW.</p>
73	Environment Strategy 1.m. Establish and implement a monitoring and evaluation program to determine the effectiveness of restoration, enhancement, and recovery strategies for ESA-listed and other species of tribal significance.	<p>WAC 197-11-238 SEPA/GMA integration monitoring states (emphasis added)</p> <p><b><i>“Monitoring information is important to maintain the usefulness of the environmental analysis in plans and development regulations for project-level review and to update plans under chapter 36.70A RCW. GMA counties/cities are encouraged to establish a process for monitoring the cumulative impacts of permit decisions and conditions, and to use that data to update the information about existing conditions for the built and natural environment”</i></b></p> <p>Rather than being aspirational, the County should implement a program to monitor and evaluate the effectiveness of the CAO and SMP, with close attention paid to the number of variances, buffer reductions, buffer averaging, etc. as well as the area (both project specific and by sub-basin) in which they intrude into a critical area or its buffer.</p>



		<p>Additionally, species of tribal significance extend beyond ESA species. However, the extent to which County Code will protect species or their habitats not specifically listed in the CAO is suspect. Page 11 of Hearing Examiners Decision dated 7 February 2024 for “<i>Shirley Wetland Buffer &amp; Setback Reduction Critical Area Variance (CVAR) &amp; Administrative Zoning Variance (ZVAR-Admin)</i>” reads (emphasis added):</p> <p><i>“Animals. Various commentators such as ..... identified that the proposal would adversely affect wildlife at the project site, such as beaver and amphibians. <b>None of the species identified in the comments are protected by the County’s critical areas ordinance so any impacts to them would not be considered significantly adverse.</b>”</i></p>
73	Environment Policy 2.1. Use the <b>best available science</b> in developing policies and development regulations to protect the functions and values of critical areas.	<p>The County has not used Best Available Science to set stream buffers for Type N or ) streams, or to include riparian areas as a critical area.</p> <p>See the Tribe’s comments to the DEIS for more details.</p>
73	Environment Policy 2.2. Give special consideration to conservation or protection measures necessary to preserve or enhance anadromous fisheries.	<p>The methods to quantify impacts to ensure effective mitigation is proposed are absent from the Comprehensive Plan, the DEIS, and the CAO. Indeed, the County has no mechanisms in place to (1) cross check the accuracy of stream typing; (2) ensure that mean stream bankfull width and gradient are included in Special Reports to confirm that the efforts to down type streams or type new streams are in compliance with the physical criteria for presumed fish use (WAC 222-16-030 and WAC 222-16-031 and the manuals referenced in those WACs.) .</p>
73	Environment Policy 2.3. Provide development regulations that protect all functions and values of	<p>Unless the County adopts the SPTH as described in Rentz et al. 2020, the County's development regulations will not</p>

	critical areas to ensure <b>no net loss of ecological functions and values.</b>	<i>"protect all functions and values of critical areas to ensure no net loss of ecological functions and values."</i>
74	Environment Policy 2.4. When considering expanding an urban growth area, <b>avoid including lands that contain large amounts of mapped critical areas.</b>	<p>The wording in this sentence is ambiguous and should be clarified. For example, does "<i>large amounts of mapped critical areas</i>" mean areas currently mapped as shown on the County's website, does it include critical areas mapped by experts and contained in Special Reports but not included on the website, etc?</p> <p>Additionally, it should be clarified if large refers to the areal extent of the critical areas, or the number of critical areas, or some combination.</p> <p>Furthermore, unless the County proactively checks for critical areas, given the shortcomings in knowledge about about the location critical areas such as wetlands, small streams, <i>etc.</i>, implementing this policy will ignore unmapped areas.</p> <p>Also see comments to page 31, Land Use Policy 1-3.</p>
74	Environment Strategy 2.b. Designate critical areas by <b>using the best maps feasible</b> and performance standards.	<p>Supplementing the existing maps with information contained in the Special Reports submitted to the county as part of the permit process will help locate currently unmapped critical areas as well as redefine the boundaries of existing critical areas. The County must prescribe a timely measure for incorporating such information into the online databases.</p> <p>Also see comments to page 31, Land Use Policy 1-3.</p>
74	Environment Strategy 2.d. Acknowledge the benefits of beavers to natural systems and water availability and explore designating beavers as Species of Local Importance in the Critical	<p>The Tribe supports this. However, the Tribe in its response to the Scope of the EIS for the Comprehensive Plan update also listed black bear, bobcat, cougar, heron rookeries, wood ducks as examples</p>

	Areas Ordinance.	to be included.
74	Environment Goal 3. Natural Resources as an Asset Formally treat natural environments and ecosystems including forest lands, shorelines, freshwater systems, and <b>critical areas as essential assets that are planned for, managed, and invested in</b> to meet the needs of current and future generations.	<p>The asset program is at pretty high level and relies on a set of indicators and so it often lacks accuracy for the stated purpose.</p> <p>Additionally, to meet this Environmental Goal, the location of critical areas need to be accurately known, new or revised locations updated, and a method to quantify the impacts prescribed. Great effort has been devoted by many agencies to determine impacts to wetlands, scant effort has gone into quantifying the impacts to other critical areas such as stream or stream buffers. Quantification must extend between comparison of the square footage of impacted area to square footage of proposed mitigation with a scaler not based on current science.</p>
75	Environment Policy 4.1. Collaborate across County programs and external agencies and organizations <b>that supply data,</b> analysis, and support for managing and restoring natural environments and resources.	The County has a tremendous wealth of site specific data generated by Special Reports. Unfortunately, that information is out of date and hard to access. To meet this Environmental Policy, the County must ensure the information provided in special reports is vetted and then incorporated into the County databases.
76	Environment Strategy 5.a. Explore opportunities for mitigation banks	As noted in the Tribe's comment letter on the Scope of the EIS, the Tribe has numerous concerns about mitigation banks. The Tribe does not currently support the default use of mitigation banks or in lieu fee programs over onsite and in kind mitigation.
76	Environment Strategy 5.c. Ensure staff are trained on the use of emerging best practices in the area of sustainable land use practices, including green building and site design, and create awareness of these preferred practices through	Staff from the Tribe have participated in numerous site visits with County staff. Discussions during some site visits indicate County staff need additional training on stream typing requirements, how to ensure the narrative in a report downgrading a stream from Type F to N

	the use of pilot programs, model ordinances, education, and incentives, while in balance with other Growth Management Act required elements.	or suggesting a newly discovered stream is a Type N, rather than a Type F complies with the WACs, etc..
95	Housing Strategy 3.b. Pursue tools to improve and streamline permit review processes, including efforts to reduce permitting timelines, bolster staff capacity for permit and application review, and other improvements to processes related to regulatory predictability.	<p>The chronic out of date status of the critical area mapping detracts from the ability to streamline the permit review process. Properties showing no mapped critical areas are purchased and then during the permit process these innocent purchasers discover there are critical areas on the property or adjacent properties (increasing the likelihood of a critical area being on the property), Type F streams are incorrectly mapped as Type N</p> <p>Additionally, poor documentation in Special Reports leads to request for site visits which can take time to put together and sometimes results in a need to alter the proposal. To streamline the permit review process, the County must ensure that Special Reports are accurate, staff are trained to determine if the reports meet State requirements for water typing, etc. See also comments to page 76, Environmental Strategy 5.c.</p> <p>As noted before, the County must routinely update its critical area databased and included an overlay that shows what special reports have been prepared for each parcel to enable consultants to see what other reports might influence their conclusions and suggest additional work be conducted early rather than later when work has gone into project design.</p>
123	Parks Policy 5.3. When implementing the Parks, Recreation, and Open Space Plan, ensure that coordination with Washington State Department of Fish and Wildlife, local Tribes, <b>and other relevant stakeholders</b>	<p>The Tribe is a more than a stakeholder, it is a treaty rights holder.</p> <p>This is one of two direct references in the Comp Plan to protecting treaty reserved natural resources, the other is found on page 150 in the Climate Change Section.</p>



	occurs to <b>ensure protection of treaty reserved natural and cultural resources.</b>	Page 70 includes the wording, “ <i>Kitsap County works with area Tribes, agencies, and other groups to protect important natural environments prioritized by tribal treaty rights</i> ” but the intent is diminished by the word “prioritize”.
145	Tree Cover: the biophysical presence of trees including natural forests or plantations existing over a range of densities. <b>Data used for analysis defined tree cover as any vegetation taller than 16.4 feet.</b>	Tree cover should expand to include vegetative cover such as the shrubs as is contemplated by King County (King County Code 21A.60.060 GreenCenter requirements).
150	<p>Acknowledge Tribal treaty rights and culturally important consumptive and non- consumptive resources including foods, medicinal plants, and materials.</p> <p>Climate Change Policy 4.1. <b>Protect, enhance, and restore ecosystems to meet tribal treaty rights</b> and conserve resources and materials that could be adversely impacted by climate change2.</p> <p>Climate Change Strategy 4.a. Implement the Kitsap Natural Resources Asset Management Program to assist in the enhancement, protection, and restoration ecosystem health.</p>	<p>This direct reference to meeting treaty rights is absent from other sections of the Comp Plan except for page 123 Parks Policy 5.3 which reads (emphasis added):</p> <p><i>“When implementing the Parks, Recreation, and Open Space Plan, ensure that coordination with Washington State Department of Fish and Wildlife, local Tribes, and other relevant stakeholders occurs to <b>ensure protection of treaty reserved natural and cultural resources.</b>”</i></p> <p>Page 70 includes the wording, “<i>Kitsap County works with area Tribes, agencies, and other groups to protect important natural environments prioritized by tribal treaty rights</i>” but the intent is diminished by the word “prioritize”.</p> <p>To achieve the goal, the County must ensure that the Tribe is able to review all permit applications before the County issues the public notice. This would be consistent with the following wording found on page 70: “<i>Kitsap County works with area Tribes, agencies, and other groups to protect important natural environments prioritized by tribal treaty rights.</i>”</p>
191-195	Silverdale Regional Center	The Planning Area straddles Clear Creek’s lower reaches. Clear Creek in the

	Planning Area and Boundary	<p>Planning Area is used by fall chinook, coho, fall chum, winter steelhead, and cutthroat. The SOUTHWEST portion of the Planning Area includes Strawberry Creek, used by the same species as Clear Creek, except for chinook. Alternative 3 (extends the Planning Area even further into the headwaters of a tributary to Strawberry Creek.</p> <p>Clear and Strawberry creeks already face many pressures and require additional protection. There should be no future development that could preclude culvert replacements the county is responsible for.</p>
211	Silverdale Regional Center Policy 7.2. Incentivize development that utilizes Low Impact Development (LID) Practices which improve stormwater quality and runoff flow control beyond minimum standards.	<p>Though this comment is listed here because the wording on page 211, it should be taken as a global comment on the County going beyond the minimum requirements.</p> <p>Though the intent to improve water quality and runoff flow control beyond the minimum standards is welcome, in practice the County might not be as welcoming when people argue to go beyond the minimum. During a Kitsap County Hearing Examiner Hearing on Permit #23-00913 &amp; 23-02979 Silver View Apartments SEPA &amp; Administrative Appeal of ACUP (18-0073) County staff were deferential to positions that water quality facilities were built to current requirements (which is the minimum standard), even though those standards did not consider 6PPD-Q and the issue of that compound was raised by the appellant (The issue of 6PPD-Q is also covered in the DEIS for this Comp Plan). Additionally, it is unclear what is meant by improving flow control beyond minimum standards. Current standards set the release rate at that below the channel erosion threshold. The County should indicate what benefits they</p>

		anticipate by going beyond the minimum flow control standards and how doing so will not increase inadvertent impact upon aquatic life such as increasing the duration of flow adverse to them.
212	Silverdale Regional Center Policy 8.5. Enhance Strawberry Creek and riparian corridor by including an expanded riparian area in the vicinity of Linder Field and Silverdale Way, <b>public access or viewing facilities, trails, and paths along key portions of creek,</b> and public access at the confluence of the creek and Dyes Inlet.	Public access, viewing facilities, trails and paths along needs need to be limited to avoid disturbing fish.
229	Any vision for Suquamish must balance the preservation of the rights of Tribal members and of non-Indian property owners to enjoy the reasonable use of their land.	This appears to be the only time reasonable use is used in the Comp Plan. The Treaties were a grant of rights from the Tribe to the United States. Nothing in the Treaties indicates that reasonable use allows for impairment of Treaty Rights.
230	The Suquamish Rural Village shall welcome all social and economic groups. It shall provide a sense of community, and the Tribe and the County shall work cooperatively.	This appears to be the only use in the Comp Plan to welcome all social and economic groups.
238	Gorst Neighborhood Plan	<p>The landscape position makes the estuarine shoreline of the Gorst area important to salmonids, particularly juvenile chinook and chum.</p> <p>Development, including improving transportation infrastructure must consider foreclosure of potential restoration options, such as road widening occupying former intertidal areas or relict pocket estuaries. As juvenile salmonids move offshore as they grow the greater the distance from Gorst Creek, the fewer juveniles salmonids from Gorst will use the mitigation site compared to what would have occurred at the impacted site.</p> <p>The above is something to be considered during the implementation of Gorst Policy</p>

		<i>5.1 (Coordinate with the Cities of Bremerton and Port Orchard, the Port of Bremerton, the Department of Defense, WSDOT and state and federal legislators on developing and executing designs to expand SR3 and SR 16 in the Gorst area) and achieving this would help comply with Gorst Policy 2.2 ( Promote shoreline and habitat restoration along Sinclair Inlet).</i>
239	Gorst Creek supports a fish rearing facility managed by the Suquamish Tribe and Washington State Department of Fish and Wildlife.	The WDFW does not managed any of the rearing facility. It is managed by the Suquamish Tribe and the City owns the property, so it is a cooperative effort between the Tribe and City of Bremerton.
243	Gorst Strategy 2.a. Upon annexation, the City shall apply its Shoreline Master Program to Sinclair Inlet and Gorst Creek. In addition, the City shall apply a Gorst Creek Management Zone Overlay recognizing the habitat requirements of listed fish species, the current degraded buffer conditions, and tailored approaches to implement best management practices and incentives for restoration.	<p>The differences between two and resulting levels of protection should be discussed in the FEIS. There should be no buffer reductions for wetlands or streams. See also comment to Gorst Strategy 2.b.</p> <p>Additionally, while some other Neighborhood Plans, such as that for Keyport has goals related to archaeological or cultural structures or places, there is none for Gorst. This is a tremendous oversight as the Gorst areas has a high probability of containing archaeological and cultural sites</p>
243	Gorst Strategy 2.b. Prior to annexation, Kitsap County may consider City marine shoreline buffers and the Gorst Creek Management Zone Overlay as a means to mitigate negative impacts when reviewing site specific land use applications, such as variances.	These should be compared to <i>Rentz et al 2020</i> , and if less than the buffers stated in the WDFW Best Available Science document, the reduction in buffer values and functions should be compared to the document and not to a SMP whose buffers are designed to accommodate use.
244	<b>Gorst Policy 3.1.</b> , with a preference for infiltration to reduce fecal coliform.	The preference for infiltration will also reduce impacts to groundwater recharge.
244	Gorst Policy 3.4. Wherever practicable, require low impact development measures such as	This is a global comment elicited by this policy. The amount of stormwater generated can be reduced by building



	infiltration for new development and redevelopment. Where impractical, stormwater detention may be allowed.	higher buildings to achieve the same housing density, but reducing the ground footprint.
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Streams				
Water Type	Buffer Width	<u>UGA Alternative Buffer Width*</u>	Minimum Building Setback	Other Development Standards
<b>S</b> As defined and regulated in Title <a href="#">22</a> (SMP)	See Title <a href="#">22</a> (SMP)	<u>NA</u>	See Title <a href="#">22</a> (SMP)	Where applicable, refer to the development standards in Chapters <a href="#">19.200</a> (Wetlands) and <a href="#">19.400</a> (Geologically Hazardous Areas). Where such features occur on site, the more restrictive buffer or building setback shall apply.
<b>F</b>	<u>200+50 feet</u>	<u>150 feet</u>	15 feet beyond buffer	
<b>Np</b>	<u>100+50 feet</u>	<u>75 feet</u>	15 feet beyond buffer	
<b>Ns</b>	<u>100+50 feet</u>	<u>75 feet</u>	15 feet beyond buffer	
<b>O</b>  <b>Lakes less than 20 acres</b>	<u>100 feet</u>  100 feet	<u>75 feet</u>	<u>15 feet beyond buffer</u>  15 feet beyond buffer	<u>Where lakes have associated wetlands, a wetland delineation and rating may be required in accordance with KCC 19.200. The greater of buffers shall apply.</u>
Wildlife Habitat Conservation Areas				
Class I		Buffer widths and setbacks will be determined through a mandatory habitat management plan (HMP). In the case of bald eagles, a HMP will not be required, but additional state and federal permits and/or timing considerations for construction may be required to ensure compliance with all federal laws, including the federal Bald and Golden Eagle Protection Act ( <a href="#">16 USC 668</a> ) to avoid impacting eagles and their habitat.		
Class II		Site-specific conditions will determine the need for the preparation of a HMP.		

1

\* See 19.300.315(A)(3) for criteria.

Fig 1. Table 19.300.315 Fish and Wildlife Habitat Conservation Area Development Standard

[compplan@kitsap.gov](mailto:compplan@kitsap.gov)

April 8 2024

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from the Critical Areas Ordinance Update 2024

[Return to Comment Matrix](#)

# Comments on Comprehensive Plan 2024

- Manchester Sub Area
- Manchester Policy 4.1. All future County projects including but not limited to Beach Dr., Colchester Dr., Chester Rd., Main Street, Madrone Street, Alaska Avenue and California Avenue, should include continuous paved trails/bike lanes for non-motorized use.
- Beach Drive from Port Orchard to Manchester should be included in this policy. Bike facilities need to connect communities.
- Plan a continuous stretch with painted 6ft bicycle/pedestrian flexible space and if this is not possible in certain areas, use traffic calming to create safety
- Change current policy to increase areas for traffic calming
- Use Non-motorized committee and organize communities to get to solutions

An appeal to the Kitsap County Commissioners to include the safety measures mentioned herein for inclusion in the 2024 Comprehensive Plan.

This proposal to improve safety for motorists *and* vulnerable users on Beach Drive provides context relating to County planning, survey data, accident data, and photo examples of dangerous sections of Beach Drive. Included are potential solutions for consideration to prioritize safety improvements.



# Goals need specific plans

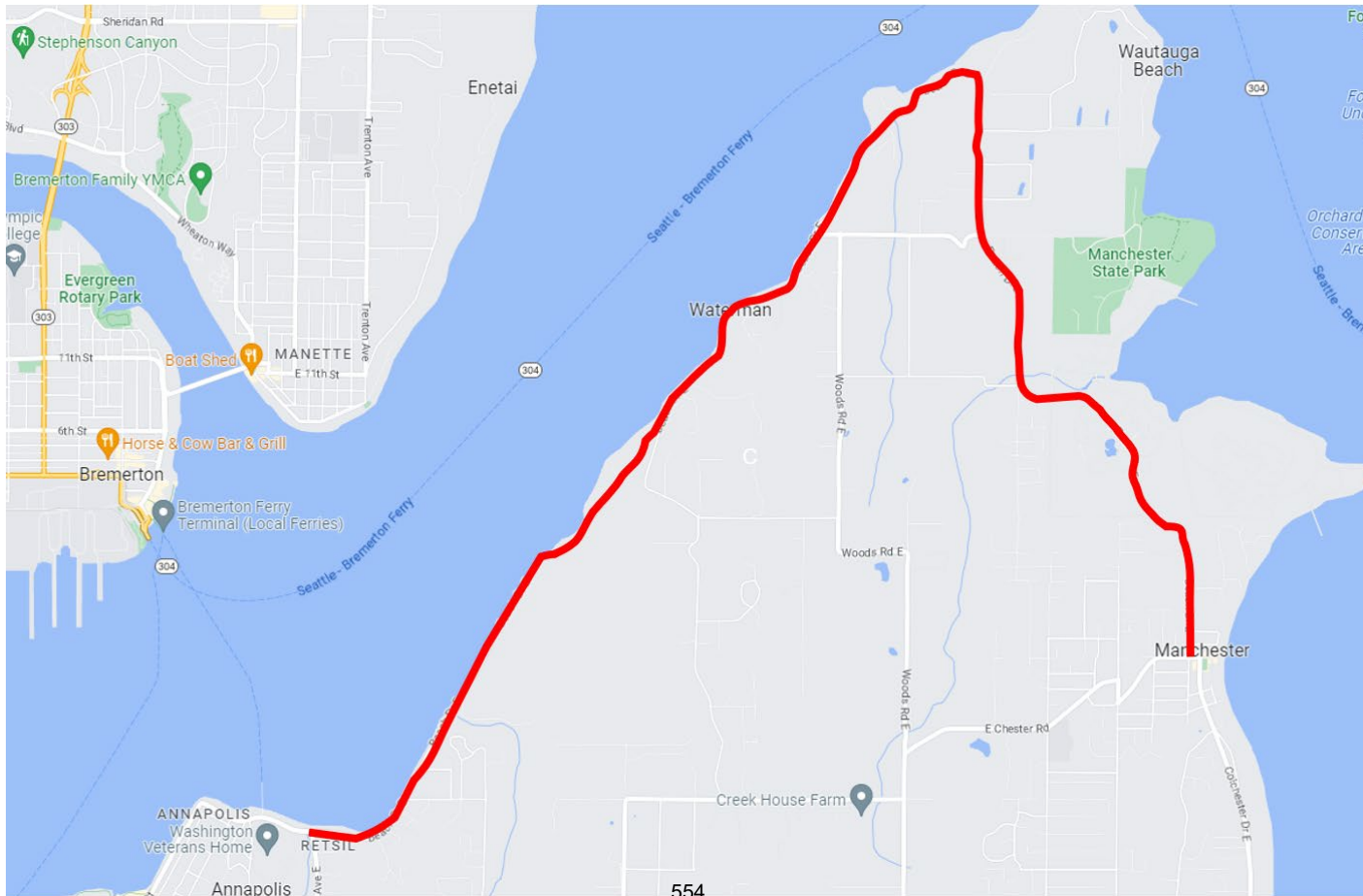
Transportation Goals of #3 Safety and #4 Complete Street have been included in this Comprehensive Plan.

- Speed Limits need to change where 6 ft shoulders can not be built.
- Traffic Calming measures need to be considered
  - Speed Tables could be placed before and after the Waterman pier at this time (a 25 mph stretch) since that speed limit meets guidelines for traffic calming.
- Signage is needed to educate motorists that they share the road with cyclists and pedestrians, “vulnerable users”, who have equal rights regarding the safe use of the roadway.

# Kitsap's Beach Drive:

A Residential Street with hundreds of private driveways and a premier bicycle route . . .

. . . yet, also a danger for all users.



# The Mosquito Fleet Trail Master Plan

Prepared for Kitsap County Department of Public Works, August 2001



## **Project 9 of 10: Port Orchard to Manchester - Beach Drive**

The Beach Drive segment of the Mosquito Fleet trail is the jewel of Kitsap County - a lovely, level waterfront with minimal development on the water side of the road. None of the shared use paths or bike lanes proposed in the plan for Beach Drive have been built since the plan was adopted over 20 years ago. This is probably because the route was not vetted for feasibility. There isn't room in the right of way for the needed 8 to 10 feet for bike lanes, or 10 to 12 feet for a shared use path.

Regrettably, the road lacks paved shoulders where they are most needed on curves. Many residents, some who are disabled, have to cross the road to reach their mailbox, yet it is hazardous to walk along Beach Drive. Speeding is common on this mostly residential road which is designated a minor arterial.

This Presentation will look at what *can* be done to make Beach Drive safer.

# Current County Planning

- Current Kitsap County Comprehensive Plan Transportation

Goal #5: Provide opportunities for people to make choices among alternative modes of travel with an emphasis on moving people rather than vehicles and maximize opportunities for non-motorized travel.

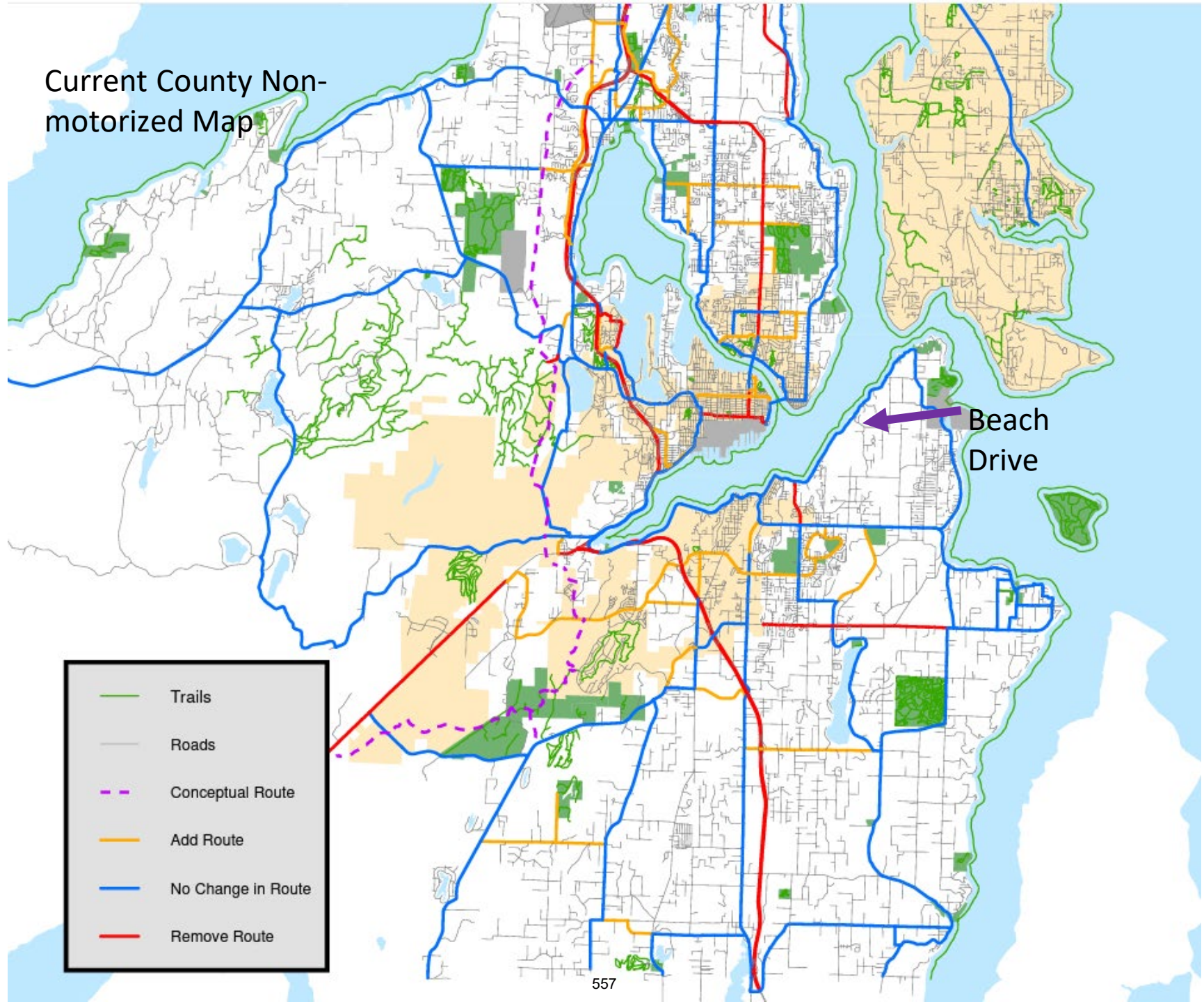
- Current Non-Motorized Facility Plan Route/Project Prioritization

Beach Drive meets all of the following Criteria for High Priority

- Connectivity (Efficient, Links to Ferries, route to Manchester Park)
- Safety (Address high hazard bicycle areas, Consider Traffic Demand Management Techniques such as reducing speed on primary bike routes)
- Feasibility (Low cost of slowing speed limit)
- Potential Use (High Scenic/View Value)
- Continuity (Improves deficient segment of Mosquito Fleet Trail)
- Others (Mosquito Fleet Trail is included in Non-motorized Plan)



# Current County Non-motorized Map



- In the past 10 years there have been over 100 collisions on Beach Drive. A handful involved bike users and pedestrians, with some serious injuries.
- Accidents doubled in the last three years on the northern segment of Beach Drive where the road curves significantly and sight distance is minimal.

Near misses happen daily, and too often cars leave the road.







There is no shoulder for bike users or pedestrians on this blind curve.



## Survey of Residents

- Amy and David Lawrence posted a notice to residents on Beach Drive near the Waterman Dock requesting they complete an online survey. We received 170 responses over the course of one month.
- Two thirds of respondents were pedestrians, most of whom live on Beach Drive. One third were motorists who regularly drive the road.
- Most complaints relate to speeding motorists, lack of enforcement of the existing speed limit, and inadequate space on the road for non-motorized users. A few motorists complained that residents (as pedestrians) and cyclists should not use the road because it is not designed for their use.
- Suggestions for safety improvements mostly consist of adding speed tables to slow cars, better traffic enforcement of speed limits, and widening the road (not the traffic lane) to include a paved shoulder for use by cyclists and pedestrians.



# Discussion of Safety Improvements

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## 1. Make Lanes Narrower Where Possible.

- Narrowing lanes from 11 to 10 feet reduces collisions and injuries.
- **Any** additional paved shoulder will decrease the stress of non-motorized road users, and give them a marginally safer place to be.

## 2. Better Speed Enforcement

Due to patrol staffing and other priorities, Beach Drive residents have been told that regular enforcement is difficult.

The County Sheriff's Traffic Officer addressed the January 2023 Non-Motorized Committee and stated that traffic enforcement is a low priority. The Sheriff's staff are very busy. Sgt. Aman stated only one officer is available to directly pursue speeding violations.

This, despite increasing traffic fatalities, and that average traffic speeds have increased in recent years.

Kitsap County will be conducting a traffic study at Waterman Pier in the near future. We conducted our own informal study of vehicle speeds in this location in February 2023 between 4:30 and 5:30 pm.

There were 153 vehicles in our sample.  
39% traveled more than 10mph above the 25mph posted speed limit.

### **Traffic heading to Port Orchard**

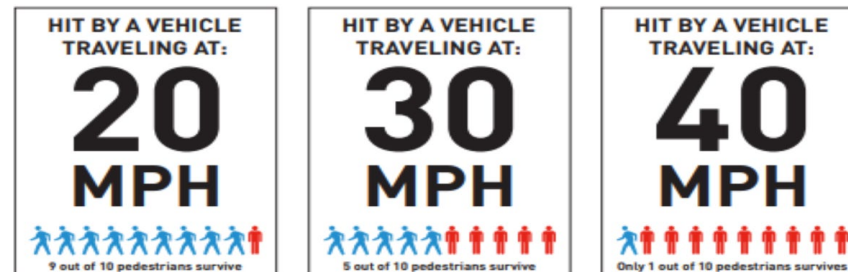
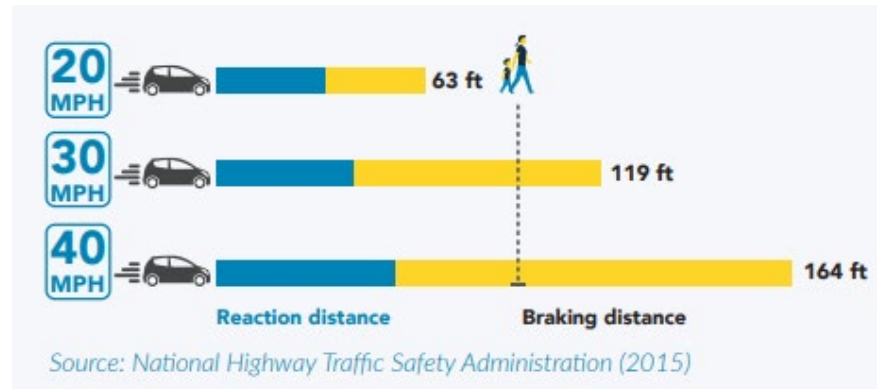
	# of Vehicles	% of traffic
25 mph	30	48%
30 mph	14	23%
35 mph	11	18%
40 mph	5	8%
45 mph	2	3%

### **Traffic heading to Manchester**

	# of Vehicles	% of traffic
25 mph	21	23%
30 mph	28	31%
35 mph	36	40%
40 mph	5	5%
45 mph	1	1%

### 3. Reduce the Speed Limit

Higher speeds increase a driver's reaction time & braking distance and significantly increases risk of death. When drivers face unpredictable, urgent reasons to stop, their speed can make the difference between life and death.



Source: [https://www.seattle.gov/Documents/Departments/beSuperSafe/VZ\\_FAQ\\_Flyer.pdf](https://www.seattle.gov/Documents/Departments/beSuperSafe/VZ_FAQ_Flyer.pdf)



- The speed limit on Beach Drive is generally 35 mph, changing to 25 mph in the area of Waterman Pier and Manchester. Yellow speed *advisory* signs appear at many curves suggesting slowing to 20 or 30 mph. There are 24 speed sign changes on this 5-mile stretch, if you include advisory signage.
- Reducing the speed limit to 25 or 30 mph for the entire stretch:
  - *May* result in lower speeds overall, but the design of the roadway is what usually determines how fast motorists go.
  - Reduce noise from motorists speeding up at signs where the speed limit increases.
  - Encourage speeding drivers concerned about “saving time” to take alternate routes.
  - Decrease collisions and injuries.
  - And, possibly most important, it would make the roadway eligible for traffic calming measures.

# Setting Speed Limits

Kitsap County Speed limits are designed for the “85<sup>th</sup>” of drivers which only considers the safety for the vehicle.

All road users need to be considered when designing or upgrading road infrastructure. The design of road infrastructure and the broader street environment should start with the needs of the most vulnerable users and then progress through to the safety needs of the least vulnerable.

“Moving past the business-as-usual approach also means evolving beyond the cars-first attitude that has dominated transportation policies and practices in the past half-century.”

Safe System Elements from World Road Association

A UN Decade of Action for Road Safety 2011–2020 has been announced with an ambitious global target and plan to reduce deaths in road traffic crashes.

## 4. Signage

Beach Drive has no such signs such as the one pictured to inform drivers that this is a bike route, or that pedestrians (residents walking their neighborhood) have no shoulder to walk on. This sign pictured at Harper is also the site of a speed limit camera to notify drivers of their speed. This could be used on Beach Drive to make motorists aware if they are speeding.



## 5. Traffic Calming

Traffic calming measures might include speed tables or speed cushions before and after significant curves where accidents are most likely to occur. They raise the height of the roadway for a short distance. If driven over at designated speeds the bump may be no more than what is felt driving into a driveway from a city street. If crossed faster than the designated speed, the “bump” is much more severe. Effective speed tables can be found on Harlow Drive near Kitsap Way Elementary School and on Tracyton Beach Road near Silverdale.



# Example of Rubber Speed Tables

## Pricing:

\$2500 for a 21 ft table  
(30 mph speed)

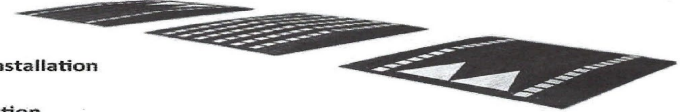
\$2000 for a 17.5 ft table  
(25 mph speed)

Total for 3 areas on Beach  
Drive = ~\$30K



Spring Valley, NY 10977 866.915.8664 www.trafficlogix.com

- ✓ Will not fade or crack
- ✓ Will maintain consistent profile
- ✓ Same profile at every location
- ✓ No heavy equipment needed for installation
- ✓ Lane closure during installation
- ✓ Drivable immediately after installation
- ✓ Highly visible embedded reflective markings
- ✓ Can be removed, stored and relocated



# VS



## Asphalt

- ✗ Will fade or crack over time
- ✗ Will compress with repetitive impact
- ✗ Uneven profile at every location
- ✗ Heavy equipment definitely required for installation
- ✗ Street closure during installation
- ✗ Drivable after 2 -3 days of cure time
- ✗ Markings need repainting after a few years
- ✗ Must be destroyed for street repairs

Traffic Logix rubber traffic calming devices (Speed Cushions, Speed Humps and Speed Tables all have designed speeds. These design speeds vary depending upon the overall length as one would drive over them.

This designed speed is based twofold in slowing vehicles to safer speeds.

I. Provide a manageable and comfortable ride.

II. Provide a safe handling speed within a +/- 5mph of the designed speed.

### Traffic Logix Designed Speeds +/- 5 mph

7' Long: 5 - 15 mph. 10.5' Long: 15 - 20 mph 14' Long: 20 - 25 mph: 17.5' Long: 25-30 mph 21' Long: 30-35 mph

At a +10 mph over the designed speed, the driver still has vehicle control, but odds increase that low sitting vehicles may bottom out and surely the ride would then become more uncomfortable, but not dangerous.



All Traffic Logix rubber products are made from recycled rubber and is designated as a GREEN product

## Results of Speed Tables

(US. Dept of Transportation Federal Highway Administration)

- The most frequent post-implementation speed is 30 mph.
- For the study sites, 27 percent of the pre-implementation traffic had a measured speed that was at least 10 mph higher than the posted speed limit. After installation of a speed table, this high-speed traffic had dropped to an average of 3 percent of the total traffic.
- The average reduction in the reported daily volumes is 20 percent

There are few alternatives to speed tables as traffic calming devices on Beach Drive. That said, these devices are prohibited due to Beach Drive's classification as an arterial (which we feel is inappropriate, for reasons to follow) and due to the 35 mph speed limit (which is itself problematic).

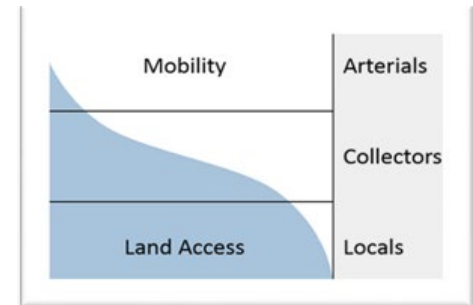
### Traffic Calming Program Section 9 of Kitsap County Road Standards

- **9.2 Eligible Roadways**
  - A roadway considered for traffic calming must meet each of the following eligibility requirements:
    1. A candidate road must be paved and maintained by the County, and
    2. The road must be a local access road as defined herein, and
    3. The road must have a posted speed limit of 30 mph or less, and
    4. A candidate roadway cannot have more than 2 lanes of traffic in either direction, and
    5. The roadway must have a longitudinal slope of less than 8% at all points where speed humps may be proposed.
- **9.3 Qualifying Criteria**
  - Candidate projects meeting the above eligibility requirements will be considered for funding provided that each of the following qualifying criteria is satisfied:
    1. 25% of the existing traffic must be traveling at least 10-mph over the posted speed limit, as determined by the County Traffic Engineer, and
    2. The average daily traffic (ADT) must be between 200-3000, and
    3. At least 70% of the affected property owners (one vote per property) must support speed countermeasure installation. Affected property owners are those individuals who must use the subject roadway to get to a convenient collector or arterial roadway, or who own property that abuts the subject road.
  - Projects that do not meet all of the above qualifying criteria will not be considered further.

## 6. Recategorizing Beach Drive as a “collector” road

Considerations in Kitsap Road Standards which indicate Beach Drive should *not* be designated an arterial:

- Beach Drive is not the most direct route between communities or business
- Beach Drive is curved and without paved shoulders where vehicles routinely exceed safe speeds.
- Beach Drive gives access to Waterman Pier, Manchester State Park, the Navy fueling station in Manchester, and literally hundreds of access locations to resident’s driveways. There are essentially no commercial establishments along Beach Drive.
- It has high pedestrian activity due to adjacent homes, and high bicycle activity due to its scenery and flat elevation, known throughout the state as a destination cycling location.
- It is categorized as Rural by the County, and Urban by WSDOT.





Slowing traffic on Beach Drive (orange) would encourage commuters and those in a hurry to take the faster and most direct route (green line), between Port Orchard and Manchester. Both Mile Hill and Colchester are minor arterials.



## 7. Measures needed to make Beach Drive safer.

The eligibility criteria for traffic calming, that a road must have a speed limit of 30 mph or lower, should be removed.

Beach Drive should be re-designated a “Collector” (which it most closely resembles by existing criteria), so the speed limit can be reduced to 30 mph and speed cushions installed in critical locations (as long as all other criteria are met).

Criteria that 25% of the existing traffic must be traveling at least 10-mph over the posted speed limit to allow traffic calming measures should be amended to include posted advisory speed, and exceptions added to this criteria if a roadway lacks sufficient space for safe paved shoulders for non-motorized users.

# Appendix

A selection of Beach Drive photos

## Beach Drive east of Olney, 1 mile segment

Marginal but useful paved shoulders





First curve east of Olney 35 mph speed limit,  
a sign *advises* the safe speed is 30 mph



The other side of the curve - no paved shoulders.





Mailboxes are all on other side of the road from the homes, residents must cross here with curves



Near E. Hillcrest Ave: There is a 35 mph speed limit around this curve - no paved shoulder





## Waterman Pier

Cars parked at Waterman Pier need to back into the roadway to exit.



East of Woods Road, a bike alert signal precedes the curves. A safe speed sign *advises* 20 mph.

The flashing light does not work reliably in cloudy conditions. Perhaps eliminating the words “WHEN FLASHING” would be safer.





## Curve east of Lighthouse Point



View from around curve - no paved shoulder.





# Wynn Jones area



Heading south to Manchester near Navy fuel storage - there is a narrow paved shoulder.



April 4, 2024

Kitsap County  
ATTN: Scott Diener, Planning Manager  
614 Division Street, MS-36  
Port Orchard, WA 98366

**Subject: WDFW Comments on the Kitsap County Draft Comprehensive Plan 2024 Update**

Dear Scott Diener:

On behalf of the Washington Department of Fish and Wildlife (WDFW), we offer our comments on the 2024 Draft Comprehensive Plan Updates, as part of the current periodic review under the Growth Management Act (GMA). WDFW is dedicated to preserving, protecting, and perpetuating the state's fish, wildlife, and ecosystems while providing sustainable fish and wildlife recreational and commercial opportunities.

In recognition of our responsibilities, we submit the following comments for the 2024 draft comprehensive plan update; acknowledging other comments may be offered in the future. We strive to maintain contact throughout this periodic review and look forward to continued engagement as the process moves toward completion.

**Land Use Element**

*Land Use Policy 2.3 - Reduce stormwater runoff.*

WDFW recommends adding more specific language for stormwater management and citing the Department of Ecology's most current version of [Stormwater Management Manuals](#). The minimum requirements of these Ecology manuals for new and redevelopment should be used, including the flow control and treatment standards. The use of low-impact development (LID) standards should also be considered for better management of stormwater for new development, redevelopment, and retrofit projects.

*Land Use Policy 11.1 - Review and update site design standards for all new residential, commercial, and mixed-use development in UGAs to ensure...*

WDFW recommends referring to the Department of Commerce’s [Menu of Measures](#) for climate planning guidance and adding a statement that LID should be followed for new and re-development projects.

*Land Use Strategy 14.5.b - At the five-year mid-point of the Comprehensive Plan cycle, evaluate the effectiveness of development regulations.*

It is unclear how this effectiveness will be measured. We suggest adding a statement that details what tools and criteria will be used in this evaluation.

## **Environment Element**

### **Background**

Kitsap County could expand this section of this element by including a reference to the [salmon recovery plans](#) and lead entities that work on these plans within Kitsap County.

### **Key Terms**

We request that Kitsap County define the term “ecosystem services” and include this definition in this section.

*Environmental Policy 1.5 – Enhance urban tree canopy and promote benefits of urban forests as it relates to a healthy environment, climate change, stormwater, and community livability.*

WDFW supports the inclusion of this policy and sub-policies due to the benefits associated with urban tree canopies. We do request that state-listed plant species from the Department of Natural Resources’ [Natural Heritage Program](#) are included in the environmental strategy 1.m.

*Environmental Policy 2.1 – Use the best available science in developing policies and development regulations to protect the functions and values of critical areas.*

WDFW recommends that references to the best available science be included in this policy at least on a broad level. While citing specific sources, such as WDFW’s PHS resources, may be beyond the broad scope of the comprehensive plan, at least listing out state agencies and typically used best available science providers showcases where this information should be coming from.

*Environmental Policy 2.4 – When considering expanding an urban growth area, avoid including lands that contain large amounts of mapped critical areas.*

WDFW supports this policy because it will protect critical areas while also preventing development variance requests to the county. However, we request that Kitsap County consult the [required buildable lands report](#) for the county to ensure that the use of currently available land and infill are utilized prior to expanding urban growth areas.



*Environmental Policy 2.5 – When considering expanding an urban growth area, avoid including new areas within a 100-year flood plain unless no other alternatives exist.*

We would support this policy if the “...unless no other alternatives exist.” part is removed. This policy is important for preparing for climate change impacts. Flooding may increase under climate change scenarios and preparing for this is important to take into consideration for these impacts.

*Environmental Strategy 2.a. – Identify open space corridors within and between urban growth areas that include lands useful for the connection of critical areas.*

WDFW advocates for the protection of these open spaces and protected stand-alone habitats to promote biodiversity and movement. We’d encourage the county to identify and expand habitat protections to improve habitat quality and connectivity to foster climate resilience using conservation area designations, buffers, and protected corridors to support species movement.

*Environmental Strategy 2.c. – Review plan, regulation, and permit implementation monitoring results, and where applicable, incorporate adaptive management measures to ensure regulations are efficient and effective at protecting critical area functions and values.*

This would be a great strategy to highlight the importance of no net loss of ecosystem composition and functions, especially in priority habitats and critical areas.

*Environmental Policy 3.3 – Continuously improve mapping, inventory, and baseline information of natural assets and their condition.*

WDFW recommends that the best available science be used while these improvements occur and encourages Kitsap County to add that language to this policy. While it is recommended to cite specific sources, such as WDFW’s PHS resources, at least listing out state agencies as resources to obtain the current best available science.


## **Transportation Element**

*Transportation Policy 1 - Plan, locate, design and operate transportation facilities to minimize negative environmental impacts.*

WDFW supports minimizing the negative environmental impacts that transportation facilities may cause. We recommend identifying where high levels of wildlife road mortality or wildlife-vehicle collision areas are and conducting wildlife mortality studies at suspected problem areas. In addition to those areas, identify where biodiversity and habitat connectivity corridors occur that facilitate wildlife movement. Once those locations are identified, plan to avoid and minimize impacts from transportation at these locations.

We value the relationship we have with Kitsap County and look forward to our continued collaborative work as this update is brought to a successful conclusion. As you contemplate revisions to the proposed Comprehensive Plan, I will serve as your contact person. If you have any questions or concerns, please feel free to contact me at (564) 669-4755 or [Jessica.Bryant@dfw.wa.gov](mailto:Jessica.Bryant@dfw.wa.gov).

Sincerely,



Jessica Bryant  
Regional Land Use Planner – Region 6  
1111 Washington St SE  
Olympia, WA 98501

Cc: Gwen Lentes, Regional Habitat Program Manager ([Gwendolen.Lentes@dfw.wa.gov](mailto:Gwendolen.Lentes@dfw.wa.gov))  
Lindsay Wourms, Assistant RHPM ([Lindsay.Wourms@dfw.wa.gov](mailto:Lindsay.Wourms@dfw.wa.gov))  
Kara Whittaker, LUCP Section Manager ([Kara.Whittaker@dfw.wa.gov](mailto:Kara.Whittaker@dfw.wa.gov))  
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Adam Samara, Area Habitat Biologist ([Adam.Samara@dfw.wa.gov](mailto:Adam.Samara@dfw.wa.gov))  
Jenn Eberly, Habitat Biologist ([Jennifer.Eberly@dfw.wa.gov](mailto:Jennifer.Eberly@dfw.wa.gov))  
David Snyder, Habitat Biologist ([David.Snyder@dfw.wa.gov](mailto:David.Snyder@dfw.wa.gov))

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## Kitsap Conservation District Public Comments

**Introduction:** Land is the foundation of our food system and land stewards are the key to climate resilience. Local farms are essential to our daily lives. Investing in preserving farmland in Kitsap means healthy food for our children, thriving rural economies, and fertile, productive soil. Simply put: healthy farms make our communities better. However, the future of farming is threatened. Over the last four decades, some of Kitsap’s best soils have been irreversibly lost to development. In the next ten years, 70% of local growers will retire without a successor in place, and new farmers face countless barriers to accessing land.

We appreciate Kitsap County and the Department of Community Development’s responsiveness to previous public comment about these important issues in development of the 2024 Comprehensive Plan. We would like to offer the following comments with regard to the Draft Plan:

### Land Use Chapter

#### ***1. Please Get the Rural Element Right***

- DCD staff have placed necessary but unbalanced focus on urban elements in the Land Use Chapter of the 2024 Draft Comprehensive Plan. As the Comp Plan is so important to guide planning for the next decade, and will influence land use in Kitsap much longer, revisit the Rural Element in 2025.
- Include the following statement: “Review and revise all sections of the rural element as it pertains to agriculture and farming in 2025 to create a Comprehensive Plan to compensate for the focus on urban and suburban elements of the 2024 Comprehensive Plan.”

#### ***2. Provide an objective definition of “Rural Character” to assist land use planners and other stakeholders to recommend and develop land use policies and strategies.***

#### ***3. Reduce sprawl and development in rural zones and protect working landscapes and natural resources by adopting Alternative 2 in the Draft Comprehensive Plan***

#### ***4. Language Matters. We advocate for appropriate terminology when referring to agriculture and working landscapes in the Comprehensive Plan***

- For example, several sections of the rural element refer to “small-scale” or “small” agriculture.
- Examine images of agriculture in the Climate Chapter of the Comp Plan to ensure they accurately represent the impact and value of farming

#### ***5. Evaluate and adopt workable farmland preservation strategies for Kitsap***

### Economic Development Chapter

#### ***6. Include agriculture and farming in building a healthy and sustainable economic future***

### Environment Chapter

#### ***7. The Kitsap County Natural Resource Asset Management System.***

- Farmland and open space are identified as providing a lower level of ecosystems services in the Kitsap County Natural Resource Asset Management Program compared to timber lands. This approach misses the importance of farmland and open space for pollinators, regenerative farming and other climate friendly practices and risk penalizing farmers seeking to maintain pastures and cultivated land.

#### ***8. Require farmers be included in all stakeholder groups to develop policies and regulations for all critical areas and shorelines ordinances.***

### Climate Change Chapter

#### ***9. Climate Change Goal 8. Protect and enhance forests must include farms and other working landscapes***

#### ***10. We appreciate the goal to restore and protect suitable beaver habitat to encourage natural recolonization of beavers, however we recommend Kitsap County collaborate with KCD to develop a beaver management plan to assist farmers and landowners co-exist with beavers.***

#### ***11. Additionally, we appreciate the focus on creating resilience against wildfire across private forest lands and Wildland Urban Interface / intermix areas. As a long-time advocate of Firewise communities engage Kitsap Conservation District in this effort.***





April 8, 2024

Kitsap County Commissioners  
Kitsap County Long-Range Planning Staff

**Re: Comprehensive Plan Amendment Request  
10 Acres on South Kingston Road, East of Arborwood**

Dear Commissioners:

I noticed that the final staff recommendation for the Kingston Urban Growth Area removed the above-described property.

We hope it will continue to be considered. I've attached our original request letter and would like to reiterate the following:

1. Appropriate Conditions for UGA Expansion In our original request letter (August 5, by David Evans Associates) we articulate a number of property attributes that make it appropriate of UGA expansion. We will not repeat those here, but they still stand as effective.
2. Density We originally proposed that the property be designated urban residential low (URL) not understanding that Kitsap County may be focused on expansion lands where townhomes and products can be developed to achieve medium density. We believe this property is as appropriate for medium densities as it is lower density.
3. Affordable Housing Conditions Converting a property from rural to urban can be a significant windfall for property owners. We believe the county could reasonably ask for property owners of newly inducted UGA properties to contribute to the affordable housing program. We are willing to self-impose the following conditions that like-wise could be a model for a standard approach.

*The property owner agrees that if the property is developed to urban densities following a change to urban zoning the property must either:*

- i. Land Contribution *In the case of single-family or townhomes, contribute 5% of the finished residential lots to a government or non-profit entity to own and create affordable housing. (If the land is “condominiumized” into a number of lots that is fewer than the number dwelling units) then the contribution shall be land upon which 5% of the living units are to be constructed). OR:*
- ii. Cash Contribution *For single-family or townhomes (whether fee simple or on condominiumized lots) a cash contribution equal to 5% of the finished lot value shall be made to either a government or non-profit agency for the sole purpose of developing affordable housing. The cash contribution can be utilized if desired by the landowner, or if no government or non-profit agency desires the ownership of actual finished lots.*

*For apartments and condominium buildings (in which ownership is divided vertically) the landowner must make a cash contribution of the market value of developed land for 5% of the units for which a building permit is being sought at the time of building permit issuance or prior to receiving the permanent certificate of occupancy, in the sole discretion of the landowner. The land value shall be calculated on based upon the average unit size of that particular phase.*
- iii. Market Value *Market value shall be as determined by a licensed real estate appraiser unless the permitting government determines a standardized cash contribution rate for various housing types.*

Please re-consider our amendment request. The property is highly advantaged for UGA expansion and the additional conditions will be more effective at producing affordable housing than most of the other alternatives being proposed by various government agencies today.

Sincerely,

Jon Rose  
Vice President,  
Raydient

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Kitsap Environmental Coalition  
People for a Safe and Healthy Environment

April 5, 2024

The Kitsap Environmental Coalition (KEC) is a 501(c)(3) nonprofit organization that supports the protection of Kitsap's natural environment through advocacy and education. KEC recognizes the complexities of balancing social, economic, and environmental issues in the Comprehensive Plan Update especially as human actions are exacerbating climate changes that result in increasing temperatures, water supply issues, and sea level rise in our county.

With this perspective, KEC supports **Alternative 2 in the Comp Plan—with two exceptions.**

**The first exception is no upzoning on the outer edges of the current UGAs and cities or in rural areas.** (By "upzoning" we mean zoning changes that increase housing density.) KEC takes this position because:

- a. it is important to incentivize multifamily housing *within the core* of the existing UGAs and cities. Multifamily housing needs to be close to where affordable transportation and employment can be concentrated to better utilize the UGAs. We need to think in terms of *affordable living* and *affordable community*, not solely affordable housing.
- b. we need to protect our rural areas from sprawl. Sprawl weakens the natural environment that supports us all; our beautiful natural environment is a major reason people move to and visit Kitsap County.
- c. a concentrated look at the rural areas and open spaces of Kitsap County is needed and is not being done in the current 2024 Comp Plan Update. Please include a commitment in the 2024 Comp Plan to such an investigation in 2025-26. Leave rezoning considerations that affect rural changes until after Rural Kitsap and Open space is looked at as a whole. Center such an investigation on encouraging farming, agroforestry, healthy protection of critical areas, rural employment, and health for all living things.

The **second exception** is to require development to **retain existing trees** at a certain percent rather than relying on replanting trees after development (Title 17 Zoning, Development Regulations Revision).

Sincerely,

Kitsap Environmental Coalition Board

David Onstad  
Martha Burke  
Paul Larson  
Bruce McCain  
Reed Blanchard

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On the Kitsap County Comprehensive Plan Update 2024 website, you state the following,

“This is an opportunity to revise population and employment growth targets with the most up to date data; review existing goals, policies, and regulations; write new policies that reflect the priorities of communities in unincorporated Kitsap County; and confirm that all federal, state, and local requirements are met.”

I am writing as an individual who resides in Silverdale and who is also a member of the Board of Directors of the Silverdale Senior Center, (SSC) a nonprofit group established in 2022. We are a fledgling organization that has no physical location in Kitsap County. I would like to present the following data and urge you to write new policies to correct what I believe is a glaring oversight in the 2024 draft plan.

I noted that the need for early childhood education and the needs of our county's youth population are mentioned in the plan. However, other than one mention of housing issues, no other goals, priorities, or needs have been addressed regarding the population at the other end of the age spectrum: the Kitsap County senior population. I would like to share some important statistics regarding this group.

According to the U.S. Census Bureau figures for the 2020 census in Kitsap County, Table DP1—Profile of General Population and Housing Characteristics, Kitsap County had 14,618 children under 5 years of age, or 5.3% of the total county population. I assume this is the population targeted for early childhood education. I do not know your age criteria for youth. I can tell you, however, that the following data is derived from this same census table regarding seniors in Kitsap County aged 65 and older:

Ages 65 to 69	17,828	6.5%
Ages 70 to 74	14,695	5.3%
Ages 75 to 79	9,541	3.5%



Ages 80 to 84	5,271	1.9%
Ages 85+	4,901	1.8 %

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Total	52,236	19% of county population
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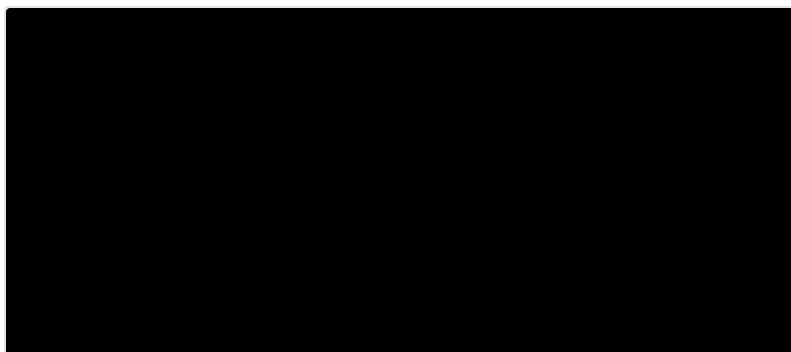
(Almost four times the population under age 5)

In a mere 6 years, we will face two major demographic changes in the United States. In 2030, the last members of the Baby Boomer generation, born between 1946 and 1964 (and one of the largest demographic cohorts in our nation's history), will turn 65 years of age. In 2019, 45 million people in the U.S. were 65 years old or older. In 2030, the number of people over age 65 is estimated to be 73 million.

<https://www.caregiving.org/research/caregiving-in-the-us/>

The Boomers are also living longer than any generation before them. A higher percentage than ever before are living into their 80s and 90s. Also in 2030, for the first time in U.S. history, we will have more citizens over 65 years of age than children under the age of 18. Source : U.S. Census Bureau, 2018

at <https://www.census.gov/newsroom/press-releases/2018/cb18-41-population-projections.html> Title: [Older People Projected to Outnumber Children for First Time in U.S. History](#)



### Older People Projected to Outnumber Children for First Time in U.S. History

US Census Bureau

The year 2030 marks an important demographic turning point in U.S. history according to the U.S. Census Bureau's...

The Silverdale Senior Center (SSC) group began forming in 2022 due to the absence of any opportunities for socializing, teaching, learning, and helping the Silverdale community (our mission statement). In 2023, SSC registered with the State of Washington as a non-profit membership corporation. As of April 2024, the organization has 93 members, and we have been growing monthly.

Because of our dramatic increase in membership, we have outgrown three private venues in Silverdale that offered to let us meet at their facilities temporarily. As a transplant from Kingston to Silverdale, I assumed the larger unincorporated area of Silverdale would have a community center. I even saw a sign adjacent to the Silverdale Kitsap County Sheriff's Department office pointing to a community center. However, that sign has now been removed, and an empty lot occupies the site where the community center once stood.

With the assistance of Central Kitsap Commissioner Katie Walters, we were able to temporarily rent a meeting space in the Community Room at the Kitsap Mall. That room has a capacity of 75 people and, thankfully, not all members attend meetings regularly. But, as we grow, it is likely we will outgrow that room as well.

I also noted in the draft plan that in 2012, 200 sf per 1,000 population was planned for community centers. In the 2016 amendments, the preferred alternative was 182 sf. That number was subsequently lowered in this current draft plan to 152 sf. Nowhere in the draft 2024 could I find any priority for the building of such a center.

On behalf of the growing population of seniors, I urge you to consider the above data and incorporate into the Amended Comprehensive Plan 2024 policies that reflect the priorities of the senior community in the unincorporated area of Silverdale in Kitsap County. I also urge you to increase the priority for building a community center in Silverdale for groups such as ours that represent almost 20% of the county

population.

Thank you.

Kathleen Sole

10763 Armada Ave NW, Silverdale, WA 98383  
katyedit@yahoo.com

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The Kitsap Environmental Coalition Board sends these concerns about the Draft EIS report to you so that you can be aware of what several KEC members have been working on over past 2 months. Attached also are our specific comments, which are also being submitted to Mr. Diener as the Responsible Official. Our comments focus on Alternative 2 since this is the Alternative that is most closely aligned with the direction given to the County through PSRC and Legislative guidance. However, providing for the opportunity to “mix and match” alternatives makes it difficult to assess the impact of what is finally decided on as the “preferred alternative”, without any additional opportunity to comment on those impacts. We have noted specific impacts when possible in our comments, but the “preferred alternative” may require an additional opportunity for comment.

The Draft EIS for Kitsap County’s Comprehensive Plan and the draft plan itself makes it hard to do any analysis of the accuracy of the growth estimates on which it is based. There are estimates of the growth targets for certain areas, based on those adopted by KRCC. But these appear to be aspirational, since the population for Kitsap County has been growing over the past three years at about 1% a year, while the plan estimates increases of almost 3% for certain UGAs. This is unlikely, for a number of reasons, including reduced household size, aging population, and problems with ferry service, and health care, as well as other issues. The Draft plan in that case does not need to accommodate that estimated growth through expanded UGAs and zoning changes. This is an important consideration since throughout the document they propose UGA expansions although they are not necessary to accommodate even those ambitious population estimates, and these result in increased environmental impacts such as allowing building in critical areas. The impacts of these assumptions also carry over in the need for greater investment in mass transit and other non-motorized options although the availability of funding for these investments is far from assured.

The County does not have, or show, a good baseline of the current conditions of the environment. Without a baseline, how do we know how bad conditions will get? Data are available to evaluate water, wastewater, wildlife, tree cover, solid waste, cars, etcetera. Yes, we may not know which square kilometer will be impacted the most and how, but we can say that several positive factors will decline and several negative factors will increase in the County as a whole. Furthermore, citizens are not asking for precision. Assume 10% increase in population and then 20% increase and make estimates for County-wide impacts. If the County will not start the conversation about current and future environmental impacts, they will not be able to measure future declines, or more hopefully, improvements. This needs to be coupled with effective monitoring to measure those changes.



If the goal is truly to protect the environment, the County should strive not just to limit negative impacts but to work to actually improve the environment. The goal should be for Net Ecological Gain, rather than no net loss. The natural environment is dying by a thousand cuts, through the loss of trees, wildlife corridors, farmlands, degradation of parks, and diminished rural areas. This concept of NEG is not discussed in the DEIS but should be included.

In many areas the DEIS and the Comprehensive Plan are too vague on the actions that need to be taken, sometimes relying on plans (e.g. WRIA 15) that have not been adopted or implemented, or are not adequate to mitigate future actions. For example, the Critical Areas Ordinance is called out numerous times as a key mitigation measure, however that ordinance is currently under review. It will only be as effective as the strength of its final requirements. If it has too many opportunities for variances and waivers, this mitigation measure will be weak and useless. Rather than vaguely describing the direction the County plans to take, the EIS and Plan should spell out specifically what the County has to do. In certain cases this will require some hard decisions on what is allowed; to apply the rules and regulations without the use of variances.

Climate change should have a section of its own, perhaps at the front, to call attention both to the impacts of climate change, as well as the actions needed by the County to address them. More detail should be provided on sea level rise, increased storm intensities and health impacts from climate change. For example, although sea levels are expected to rise over a foot in the next 25 years, there are no proposed regulations governing the development of shoreline property.

Neither the draft EIS nor the draft Comprehensive Plan address or evaluate the so-called "Framework" for the Port Gamble Forest Heritage Park as required under GMA, and as the County said would be done. The park plan is a proposed revision to the Comprehensive Plan, so the environmental impacts of the park needs to be included in this EIS. It is insufficient to vaguely say it is incorporated by "reference", especially since significant environmental impacts are neither described nor addressed. The EIS and plan must acknowledge and address the significant issues and weaknesses remaining/imbedded in this proposed park plan. Further, all environmental impacts of the park plan are required to be expressly identified, studied, and analyzed in this EIS. If impacts caused by the park plan will be identified and analyzed under SEPA in the future then it should be clearly stated that the park plan (the "Framework") will not be adopted nor projects in it funded or completed until that happens. If the County does not evaluate all environmental impacts of the park plan in the

Final EIS, then it will be opening itself to potential legal challenges regarding the scope and adequacy of the County's SEPA review.

In conclusion, we hope to someday view an EIS that actually deals with real impacts to the environments of Kitsap County. If X impacts are happening in 2023-2024, predict how X will change. And precisely how finances and actions will differ from the past to accomplish that change. Don't simply state that one alternative is better than another in 4 ways and worse in 7 ways. And that more impacts can be avoided (even though they haven't been avoided in the past). Residents now know the environmental impacts that resulted from the 2016 Comp Plan. Give us a clear vision of the future not a blurry one.

## Specific Comments

- 1.2.2 Please provide a link to view the comment letters received during the scoping period.
- 1.2.3.1 Phased review – Please explain this idea of a phased review in more detail. What exactly would be incorporated “by reference” and what would warrant a “narrower” or specific review?
- 1.3 Alternatives – Allowing a mix of Alternatives 2 and 3 can be problematic. You can’t have “your cake and eat it” - pursue both Compact Growth and Dispersed Growth. You should strengthen Alt 2, but not by allowing more dispersal.
- 1.5.3 Water Resources – Water quality and quantity needs to be more fully addressed, including establishing baseline measures for both. Several aspects of water resources were not addressed including impacts on “fish bearing” streams and the impact on small and intermittent streams and wetlands which are currently not regulated at any level (these are not regulated by the ACOE). These are critical habitats for a number of flora and fauna species. This is one area where Alt 3’s wider buffer requirements is preferable to Alt 2.
- 1.5.7 Summary of Impacts<sup>1</sup>. – Population, Housing and Employment. As discussed above, the estimated population does not align with actual experienced population, nor is there a good rationale for why that will change, unless the County actually *encourages* growth through incentives. In fact, Alternative 2 actually *exceeds* the population growth targets provided to the County by PSRC. The County’s rationale for this is that it is necessary to meet the distribution of housing, i.e. to create more affordable housing options. But if the need is for a different *mix* of housing, it seems it is possible to do that without expanding the UGAs with associated adverse impacts. Up zoning within the UGA could be done with fewer adverse impacts, and might better meet the objective of denser, more accessible developments for a changing population. The County could also provide incentives by making it easier to develop in these existing urban areas through simplifying and streamlining the permit process, waiving permit costs and consultation fees for such developments, or providing density bonuses. There does not seem to be any need to expand the existing UGAs.
- 1.5-10 Each alternative results in similar levels of transportation impact. In total, the number of vehicle miles traveled (VMT) is expected to increase between 72 and 78 percent during the PM peak hour between now and 2044. (No mention of the chemicals from tires and from vehicle exhaust flowing into natural areas and our

water at levels 78% more than at present.) However PSRC traffic demand modeling assumes VMT reductions based on the RTP model (Cascadia Aug 2022).” Thus, the data show increasing per capita miles driven, but their mathematical model predicts fewer miles driven in the future given unknown assumptions and unknown (optimistic?) effort and financing by the County and State. A good but pessimistic model would likely show increases in VMT due to increases in both people and per capita miles driven. Later in the Transportation Section the LOS for each state roadway is shown to be barely adequate now.

- 1.5-15 If the population is increasing, especially if we want to develop greater density, there will be an even greater need for parks and natural areas. The need for people to have access to nature is well documented, and natural parks are an increasing refuge for the protection of native plants and animals. Therefore an important “mitigation” should include the expansion of natural parks. Funding for this effort might include creation of a parks district. On the other hand, the EIS fails to describe the contamination flowing in terms of water pollution, air pollution, noise, illegal movement of motorized bikes into parks from new adjacent subdivisions.
- 1.5-17 The sections pertaining to Solid Waste in this EIS fail to address the increasing amount of litter on roads and public properties. The simplest prediction is that litter will increase and illegal dumping will increase at the same rate as population growth. Illegal dumping is common in County Parks according to reports by citizens and park stewards. If the garbage dumped includes chemicals or biological waste, they are significant threats to humans, wildlife, and nature. According to the Department of Ecology’s 2022 litter pickup summary, (<https://ecology.wa.gov/Waste-Toxics/Solid-waste-litter/Litter/Litter-pickup>). In the March 13, 2023, issue of the Kitsap Sun, the Department of Ecology reported that 413,697 pounds of trash were collected along state highways in Kitsap County. Litter is increasing in the State. Kitsap led the whole group in the number of “dump sites” — more than even King County. The effort to clean it all up dramatically increased with more than 10,000 hours of work in Kitsap County recorded by paid workers and volunteers. However, only half the miles of road were cleared in 2022 compared to the recent past.
- 1.5-18 The current wastewater treatment facilities fail to stop unpermitted dumping of sewage into the bays and Sound every year. Why does the County believe that the future will be better? If the future is not better, then the statement above about absolutely no adverse impacts is wrong. And they are avoidable with better stormwater systems, but unavoidable under current conditions. We



recommend stronger BMPs for Water Quality improvement as necessary for the future of Kitsap's stream and nearshore health.

- 2.5 1-1 Table states no change to stream buffers for Alt 2 and no tree retention. What is the rationale for these decisions, especially since Alt 3 *does include* tree retention and an expanded stream buffer to 100 feet? Wouldn't this requirement be just as needed for Alt 2? County will consider other changes including "increase SEPA flexible thresholds for residential development in all UGAs." What does this mean? An explanation is needed.
- 2.5 4-1 UGA size changes of alternatives. Over 460 acres increased for Alt 2, although not needed to accommodate population. Why? As discussed earlier, there does not seem to be any need to increase the UGAs. Not only is it unnecessary, but it will result in allowing developments in areas of higher risk with greater environmental impacts.
- 3.1.1.2 Earth Impacts – under Alt 2 an additional 94 acres of high geologic hazard areas would be included in expanded UGAs. However, later it states that that "Reducing UGA expansions in Moderate and High Geologic Hazard areas would reduce the potential number of persons or structures exposed to risk of damage due to geologic hazards." These statements are inconsistent and, as discussed earlier, we don't believe it is necessary to expand UGAs.
- 3.1.2.4 Significant Unavoidable Adverse Impacts They state that "trees can minimize this unavoidable impact", but earlier they stated that there were no proposed tree protections under Alt 2. In talking about Greenhouse Gas (GHG) emissions, they also state that tree loss is responsible for ~15% of the increase. Seems like the County should include tree protections in all the alternatives including Alt 2.
- 3.1.3.1 Water Resources – Affected Environment. There is no discussion of the impact of rising sea levels due to climate change and how this should impact development regulations of shoreline property. It is estimated that sea levels will rise over a foot by 2050. The County has done its own study (Kitsap County Climate Assessment Study 2020) that summarizes the projected effects, yet it does not appear that is impacting how these areas can be developed. East Coast states like Florida and Georgia have required homeowners to implement significant changes to mitigate these effects including raising building heights, but there is no evidence of that happening in Kitsap. This is irresponsible, both to the taxpayer and the property owner.

Silverdale Subarea – As noted in the draft, two-thirds of the area is in a Category I or II CARA. According to data supplied by Silverdale Water District, the level of Island Lake has not reached the outflow from the lake into Barker Creek since February 2021. Since Island Lake is the headwaters to Barker Creek, no water being supplied at the headwaters means reduced water flow downstream which several fish species including salmon and cutthroat trout call home at various times of the year. As climate change continues, one can expect this trend to continue. Development next to Barker Creek and Island Lake will only make this situation worse. In addition, there are wetlands associated with Barker Creek that will suffer from development of the property. The rural area proposed for rezoning are the largest remaining mostly undeveloped tract that contributes to groundwater recharge of the Island Lake Aquifer which supplies drinking water for the residents of Central Valley, Ridgetop, and much of Silverdale. The loss of this vital resource to development will have a severe impact on aquifer recharge and possible contamination of the groundwater. Island Lake itself has been in peril as evidenced by the fact that tens of millions of gallons of water must be pumped into the lake each summer (since 1992) to maintain an acceptable water level.

3.1.3.2 Water Resources – Impacts In February, 2023, Dr. David Onstad studied all 14 watersheds for Kitsap Peninsula plus 1 for Bainbridge Island found on the web site <https://www.epa.gov/waterdata/how-s-my-waterway> for water quality information (recorded in 2018). The database contains information about inland water bodies (streams and lakes) and coastal sites. Several easy conclusions can be drawn. First, some rivers and streams have not been evaluated. Thus, their conditions are unknown. Second, of the 15 facilities with discharge permits, such as sewage treatment plants (STP) and wastewater treatment plants (WWTP), only 1 had no current violation identified in the database. The Naval facilities are included in this database. Third, all inland waterbodies are either impaired or have unknown quality. Fourth, of the 348 coastal sites along the edges of the Peninsula and Bainbridge Island, 107 are impaired (31%), 34 are rated good (10%), and the rest have unknown quality. The ratio of impaired to good is 3:1. If we omit the unknowns, 76% of tested sites along the coast are impaired. Impaired inland waterbodies include Square Lake in CCHP and Coulter Creek at the SW border of CCHP. Others include Long Lake and Kitsap Lake. Note that possibly the best evaluated watershed is the Big Beef Creek watershed near Seabeck on the western side of the Peninsula. All inland waterbodies for that watershed in the database are impaired except for 2 unknowns.

The Kitsap Public Health District monitors County lakes and streams for bacteria hazardous to humans. In its last two reports (2022-2023), the KPHD reported that the number of streams with high bacteria levels increased 50% from 16 in 2022 to 24 in 2023. For 17 lakes, the KPHD reported that 12-18% of the lakes had too much bacteria. Hazardous level advisories were posted for 21

days in 2022 and 127 days in 2023. The EIS does not explain how the County plans to improve the quality of these lakes and streams. Will the number of impaired coastal sites increase as population increases?

3.1.3.3 The Kitsap County Coordinated Water System Plan (CWSP) Regional Supplement 2005 Revision (May 9, 2005) presents an assessment of municipal and industrial water supply needs in Kitsap County and a program to effectively provide water supply and service to customers throughout the area. Exhibit (figure) 9-1 in the CWSP report shows a prediction made in 2004 that estimates water demand out to 2030. An extrapolation of that line out to 2044 has the demand exceeding water rights for all of Group A systems by 2035-2044 depending on assumptions. Furthermore, the predicted demand also approaches the water rights for all systems by the 2040s. Doesn't the County have a newer prediction? Doesn't the prediction depend on assumptions of infiltration in the future and climate change? There should be alternative curves on the chart based on alternative assumptions about the future. KPUD could make this a stochastic model and produce confidence intervals around projections. Also, the draft does not clearly state where the water will be extracted from to supply high-density communities. Are they outside of the County? How will increased groundwater extraction influence surrounding flows of groundwater needed to support streams in the dry season?

3.1.4.1 Plants & Animals This review of impacts on plant and animal communities does not address large and small mammals that live specifically in forested habitat, amphibians that live in wetlands and have migration patterns, native plants that are replaced by clearing and grading. In the specific case of amphibians, migration patterns need to be considered and also silt fences that block those pathways need to be discouraged. Vague descriptions of animals without specificity makes the EIS review very weak in this area; it needs more specificity. The EIS needs to add the adverse impact on all wildlife by natural areas' proximity to housing areas, causing more wildlife interactions that can result in animal deaths. Displaced wildlife such as bear and cougar wander into neighboring yards and end up being killed for human safety. This happened with a cougar incident in Kitsap in 2023.

This section also does not mention the bog plants found in at least one bog in North Kitsap – Carpenter Lake Bog. Please add mention of this and other bog/fen environments in the plants and wetland sections of this document. These are important and rare in our region and occur only because of unique surface water conditions that should be taken into account when land is considered for development. In addition, a rare plant, *Hypericum majus*, has been identified at Coulter Creek Heritage Park.

The map from WDFW ranking the condition of freshwater habitat (Exhibit 3.1.4 1-1) shows that Port Gamble ranks as high quality despite the comment that most intact habitats occur in the south county.

Exhibit 3.1.4 1-2 Known Occurrences of rare plants in Kitsap County – this table states that their habitats are wetlands and riparian areas, making these areas even more valuable for protection. Later Exhibit 3.3.4.2-1 Target LOS analysis for natural resource areas – shows a significant deficit that just increases over the planning period.

3.2 Land Use – The Plan needs to protect farmland in Kitsap County. This needs to be added to the land use section. Protection of local farmland helps climate resilience, habitat, and local food production. Protection of farmland is paramount to a healthy community.

3.2.1.3 Kitsap Environmental Coalition supports the recommendation by Washington Department of Fish and Wildlife to use Riparian Management Zones (RMZs) as a replacement for the standard stream buffer widths currently used in the Kitsap County Critical Areas Ordinances.

Riparian Management Zones look at several factors that play a part in the health of these ecosystems. Salmon need cooler water temperatures to thrive and survive and the shade of trees is essential for this function. Woody debris aids in regulating the velocity of the streams and helps trap sediment. Trees and other plants in the zone stabilize the bank and the riparian zone acts as a filter to greatly reduce pollution excess nutrients from fertilizers, pesticides, herbicides or other harmful chemicals from nearby roadway use.

These Riparian Management Zone buffer widths are based upon the height of the dominant trees in the area which in Kitsap County is most likely Douglas fir. The Washington Department of Wildlife has created an online map tool to indicate these heights using data on how tall they would be if 200-years old. In those areas of Washington with few or no trees along a stream bank the buffers would be as low as 100-feet to protect streams from pollution.

For an in depth examination of riparian management zones, please refer to Riparian Ecosystems, Volume 1 as it goes into great detail about these complex systems.

Two other Washington state governments have implemented critical areas ordinances based upon riparian management zones. The City of Anacortes implemented RMZ-based buffers in 2021 while Clark County implemented a hybrid of standard buffer widths and those based upon riparian management zones.



3.2.2.1 Rural Character - The Rural Wooded Zone is becoming less and less in this area. In addition, many rezone requests are also for the conversion of Rural Protection (1 DU/10 Ac) to Rural Residential. This decrease in larger rural lots will have a significant effect on the variety of rural densities. The variety is an important aspect of the rural character in Kitsap County. Otherwise, it seems the county may end up as Rural Residential only. Take measures to protect the large rural lots and the existing character that makes Kitsap the place people love. Rural rezones should be denied, and the County's rural development expectation should be in the single percentage range. A measure to support decreased rural growth would be to remove the Rural Residential Zone. Rural development for single family homes requires the use of an on-site septic (OSS), which usually fail at some point. This environmental impact needs to be addressed and mitigated.

#### 3.2.6.1 Transportation - Affected Environment (pdf 276)

Sound to Olympics STO Trail (pdf 308)

The STO trail presents several issues that must be addressed by this EIS. First, the original STO alignments reviewed for SEPA DNS (for the String of Pearls and Non-Motorized plans) has changed greatly. About 90% of the reviewed alignments in the Poulsbo, Port Gamble, and Kingston area have been abandoned. Therefore, the earlier DNS determinations are inapplicable and a new SEPA evaluation is required.

Second, significant and unmitigatable adverse environmental impacts have been unacknowledged. The most recent example is an alignment through a Natural Area designated in North Kitsap Heritage Park. The construction would destroy important habitat that is an undeveloped, critical, and relatively large wildlife refugia and wildlife corridor adjacent to a large wetland and salmon stream complex. Bear, cougar, deer, bobcat, coyote, and beaver are among known species. No on-site mitigation is possible. There is no equivalent area available off-site anywhere in north Kitsap.

Third, because "significant adverse environmental impact for which mitigation cannot be easily identified" exists, a Determination of Significance must be issued and an EIS process started. Because alignments are connected and one section must begin where another ends, the project must be evaluated in total-- phasing is not appropriate.

- 3.3 Built Environment Public Services and Utilities – There is no mention of Health Services in this section. The Kitsap County Health Department declared a health emergency in Kitsap due to high health care costs and inadequate access to services. Although overall health services are not a function of County government, the crisis situation in our County's health services heavily impacts public services, including fire services. A health services section needs to be added addressing the impact of higher population with an already strained crisis health system.

#### 3.3.4 Parks & Recreation (pdf 375)

There are unresolved difficulties with the SEPA and GMA status of Heritage Parks.

These parks have "land use policy plans" that bring them under the jurisdiction of the GMA. The plans have various names and purposes, including forestry plans, resource management plans, master plans, Framework, etc. Some have been approved by the Board of Commissioners, others not. None of these plans, separately or collectively, have been addressed within the context of the GMA. It is our understanding that all of these park land use policy plans must be evaluated under the GMA.

The SEPA status of some heritage parks also overlaps with planning of the Sound to Olympic trail (comment §3.2.6.1). Where Parks and Public Works planning and projects overlap geographically, all relevant plans must be evaluated for SEPA in concert.

#### 3.3.4.2 Parks & Recreation - Impacts (pdf 378)

#### 3.3.4.3 Parks & Recreation - Mitigation Measures

##### **Applicable Regulations & Commitments**

Kitsap County policy must incorporate current WDFW and Ecology recommendations for the use of Riparian Management Zones and appropriately amend the Critical Areas Ordinance.

Kitsap County must incorporate current Ecology recommendations for wetland buffers, specifically the Critical Areas Code be amended to ensure the integrity of buffers as undisturbed, well vegetated areas.

##### **Other Potential Mitigation Measures**

Mitigation for Heritage Parks and other large county areas must include monitoring programs of wildlife and habitat health. Results can be used to modify management plans and projects, thus avoiding and minimizing adverse environmental impacts.

Environmental impacts of the Sound to Olympic trail must be properly addressed and addressed within the context of the PROS Plan and individual park forestry, resource management, master or other plans. (ref. comment on §3.2.6.1)

#### 3.3.4.3 Establish a policy standard to protect and restore wildlife habitat and natural ecological functions. Establish monitoring programs to identify the success of restoration efforts.

#### 3.3.4.4 - Significant Unavoidable Adverse Impacts (pdf 382)

EIS must add additional information.

The Parks, Recreation and Open Space Plan for Heritage Parks specifies protection of wildlife and habitat as important park policies, which provide multiple environmental and quality of life benefits. Wildlife and habitat management is an important and critical aspect for these parks. So-called "unavoidable impacts" can be avoided by proper planning, which includes resource assessments and subsequent landscape classifications prior to

specifying development plans (PROS Plan Appendix 5). These elements must be augmented with monitoring programs of wildlife and habitat health. Results can be used to modify management plans and projects, thus avoiding and minimizing adverse environmental impacts.

3.3.4.23-212 Heritage Parks. Shows that County can meet the LOS for this metric assuming “consideration of concepts within the Port Gamble Heritage Park Framework completed in December 2022”. This is the only clear reference to PGHP. Since that Framework is not correct and needs changes, this reference is both insufficient and inaccurate as noted in the summary comments.

Additional environmental assessment is needed in regards toinal:

1. Identification of legal encumbrances and easements;
2. Identification of all existing physical features (including pipelines, wells, specialized recreation areas, etc.)
3. Identification of potential environmental hazards (water system);
4. Policies for conservation, preservation, and/or restoration of critical natural resources;
5. Lack of resource assessments including wetlands and buffers, streams and riparian management zones, wildlife habitat, and wildlife corridors;
6. Amendments to landscape classifications as necessitated by resource assessments;
7. Trail location procedures and lack of compliance with the Critical Areas Ordinance;
8. Level of usage in terms of carrying capacity;

[Return to Comment Matrix](#)

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Please include this email message and attachment as part of the public comments on the Draft Comprehensive plan due April 11@ 4:30 pm. Thank you. Beverly Parsons

**PGFHP Master Plan/Framework; County Policy-making, Administration, and Implementation Processes**

The Kitsap Environmental Coalition (KEC) Steering Committee suggested 10 principles to guide completion of the 2024 Comp Plan Update in its submission for the April 8<sup>th</sup> Board of County Commissioners (BOCC) public hearing about the plan.

Under principle 7(related to the Park system), the KEC group requested that the existing unapproved Port Gamble Forest Heritage Park (PGFHP) master plan/framework not be approved until (a) it has been redesigned by a group representing a broader range of people and perspectives than those involved in the existing draft master plan/framework and (b) it had been considered in light of the Preferred Land Use Alternative selected by the BOCC.

I'm writing *on my own behalf* with an additional reason for not approving this plan: **Ensure that the legal approval process for plans of this type is followed.**

The county has an excellent opportunity now to refine and improve its policy making, regulatory, and implementation processes in general during this Comprehensive Plan Update. Use the PGFHP master plan/framework as a prime example for working through improvements in the decision making and implementation processes of the County.

**Background:**

On October 18, 2022, Bryan Telegin, an attorney hired by KEC, sent a letter to Alex Wisniewski and the Board of County Commissioners detailing the legal process for approval of the PGFHP master plan/framework. The attorney's letter was sent because it appeared that the county thought that this master plan/framework could be approved by the Board of County Commissioners by a simple board vote to adopt it. That approach is illegal.

As you'll see in the letter, two options exist for the approval process for the framework/master plan:

- (1) through the County's Type III approval process which involves approval through the County's Hearing Examiner and involves a public hearing; or



- (2) in conjunction with the review under the Growth Management Act, in that case, as part of the county's "annual docket" for yearly comprehensive plan amendments, or in concert with all other comprehensive plan amendments as part of the standard periodic review cycle.

The county chose to consider the PGFHP master plan/framework through the second process, that is, in conjunction with all other Comprehensive Plan amendments as part of the standard periodic review cycle (per communications with Eric Baker).

The attorney's letter goes on to say that the proposed framework is a "land use policy plan". The letter further quotes a ruling by the Growth Management Hearings Board (GMHB) that a land use policy plan that guides land use decision-making in a city or county is a subarea plan within the meaning of RCW 36.70A.080. If such a plan is adopted it is "... subject to the goals and requirements of the Act and must be consistent with the comprehensive plan." See the attached letter for further details.

### **Broader Implications for County Processes**

I have been involved over the past 18 months with the Comp Plan Update and several groups that are seeking to give high priority to the protection and regeneration of our ecosystems for the well-being of current and future generations of all Kitsap inhabitants, including wildlife. I am also involved in groups focused on affordable housing and communities.

In so doing, I am seeing a variety of situations where there is a need and opportunity for the County to improve its policy making, regulatory, and implementation processes in general.

Working through the PGFHP master plan/framework redesign and approval process can serve as an excellent "test case" for working out improvements in the decision making and implementation processes of the county. It can also reveal how changes need to be made in master plans/frameworks in other heritage parks, and around other issues such as those related to transportation.

There are many historical and current reasons for the existing major entanglements of decision-making on policy, regulatory administration, and implementation throughout County government. Now is the time to use specific situations related to the Comp Plan Update process to improve these processes and set the County on a new course that allows it to deal with the new complexities of climate and social changes.

Beverly Parsons

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October 18, 2022

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**Re: Port Gamble Forest Heritage Park Master Plan—Improper Process of Approval**

Dear Mr. Wisniewski, Members of the Parks Advisory Board, and Commissioners Gelder, Garrido, and Wolfe:

We represent the Kitsap Environmental Coalition (“KEC”), a local non-profit organization dedicated to healthy lands, water, and habitat throughout Kitsap County. At KEC’s request, we have reviewed the County’s proposed Port Gamble Forest Heritage Park Framework and the standards and requirements, review processes, and appeal avenues for this type of document. For the reasons below, the county’s current plan to require only a simple Board vote to adopt the proposed “framework” is illegal.

**A. The Proposed “Framework” Is a Master Plan Subject to the County’s Type-III Approval Process.**

First, the framework is a “master plan” as defined by the Kitsap County Code (“KCC”). This is clear from the plain language of KCC 17.110.483, which defines the term “master plan” as “a large-scale development plan to guide the long-term physical development of a particular area.” Here, the proposed framework clearly fits this definition of a master plan, as it represents the

county's long-term development plan for the Port Gamble Forest Heritage Park, including numerous trails, facilities, and infrastructure.

That the “framework” is a master plan is also made clear by the plan itself. Until recently, the framework document was titled “Port Gamble Forest Heritage Park Master Plan.” That title was recently changed, but the substance remains nearly identical to prior versions in all relevant respects. The appendices to the framework continue to accurately describe the document as a “master plan.” *See, e.g.*, Appendix Sections 2-3, 3-1, 3-2, 3-4, 4-1, 5-3, 5-4, & 7-2. Answers to the county's online Frequently Asked Questions repeatedly describe the document as a master plan, resulting from the county's “Master Planning Process.” And indeed, the county's website for the proposed framework is titled “Port Gamble Forest Heritage Park Master Plan.” This website refers to the document as a “master plan” a total of 23 times—not counting pdf documents available on at website. *See* <https://portgambleforestpark.com/>. In short, the “framework” is a master plan under the plain language of the Kitsap County Code and by the county's own repeated admissions.

This issue is relevant because master plans must be approved by the Kitsap County Hearing Examiner, as part of the county's Type-III land use approval process. The Kitsap County Code states that “a proposed master plan shall be processed as a Type III development application under section 21.04.080.” KCC 17.440.065. In turn, KCC 21.04.080 provides the procedures for Type-III quasi-judicial review, and KCC 21.04.100 lists the Hearing Examiner as the review authority and decisionmaker. Because of this, the proposed framework cannot be approved by a simple Commission vote. Rather, it may only be approved by the Hearing Examiner, after a public hearing, following the review procedures at KCC 21.04.080.

**B. Alternatively, the Proposed “Framework” Represents and Illegal Amendment of the County's Comprehensive Plan.**

But even assuming, *arguendo*, that the proposed “framework” is not a master plan under the plain language of the Kitsap County Code, its adoption by simple Commission vote at this time would still be illegal. This is because the proposed framework represents a *de facto* amendment to the county's comprehensive plan.

First, the proposed framework states that the document will be sent to the Board of Commissioners for approval and adoption. Under the Kitsap County Code, the Board is the review authority for Type IV legislative actions and rezones. *See* KCC 21.04.100 & Ch. 21.08. The Framework does not appear to be a rezone, suggesting that it is a “legislative action.” In turn, the definition of “legislative action” includes a number of broad-scale planning actions, *all* of which are subject to review under Washington's Growth Management Act (“GMA”), such as county-wide planning policies, comprehensive plans, and sub-area plans. *See* KCC 21.02.216. This alone suggests that the proposed framework is actually a GMA planning document that must be reviewed and approved in accordance with the GMA—*i.e.*, it must either be placed on the county's “annual docket” for yearly comprehensive plan amendments, or it must be reviewed in concert with all other comprehensive plan amendments as part of the standard periodic review cycle.

The county's decision to refer to the plan as a "framework" does not release the county from its obligation to review that document in accordance with the GMA. The Growth Management Hearings Board ("GMHB") and Washington courts have held that broad-scale planning documents fall under the GMA even when the local jurisdiction purports to adopt them under some other authority. Nor does the title of the document determine its status under the GMA, or whether it represents a *de facto* amendment to the comprehensive plan. As the GMHB has held:

[B]y whatever name (e.g. neighborhood plan, community plan, business district plan, specific plan, master plan, etc.), a *land use policy plan* that is adopted after the effective date of the GMA and purports to guide land use decision-making in a portion of a city or county, is a subarea plan within the meaning of RCW 36.70A.080. While a city or a county has discretion whether or not to adopt such optional enactments, once it does so, the subarea plan is subject to the goals and requirements of the Act and must be consistent with the comprehensive plan.

*W. Seattle Def. Fund, Neighborhood Rights Campaign v. City of Seattle*, GMHB Case No. 95-3-0073, 1996 WL 650348, \*19 (April 2, 1996) (emphasis in original).

Applied here, the proposed framework is obviously a "land use policy plan" insofar as it represents the county's long-term policy for development of the Port Gamble Forest Heritage Park. The document is intended to guide land use decision-making within the park, including future construction of trails, facilities, and infrastructure. And indeed, the county's Determination of Non-Significance states that the proposed framework will likely be "incorporated" into the comprehensive plan at a later date, making clear that this is precisely the type of document that falls under the GMA. For these reasons, the framework is subject to the terms and requirements of the GMA, including that it may only be adopted on the annual docket or on the more general periodic review cycle. *See* RCW 36.70A.130(2)(b) (requiring all plan amendments to be "considered by the governing body concurrently so that the cumulative effect of the various proposals can be ascertained"); *Ronald Wastewater district v. Snohomish County*, GMHB Case no. 16-3-0004c, 2017 WL 659324, \*17 (Jan. 25, 2017) (overturning amendment where it was adopted outside the annual docket and periodic review cycle processes).

Indeed, the GMHB has held that "the GMA has *removed* the discretion of cities and counties to undertake new localized land use policy exercises disconnected from the citywide, regional policy and state-wide objectives embodied in the local comprehensive plan." *Id.* at \*21. *See also, e.g., Falgatter v. City of Sultan*, GMHB Case No. 06-3-0003 (June 29, 2006), at 12 (same); *Ronald Wastewater District, supra*, 2017 WL 659324 at \*8 (same). In other words, even if the county wanted to do so, the GMA prohibits the county from adopting new land use policies outside the ambit of the GMA. Here again, that requires the county to adopt the proposed framework—if at all—only on the annual docket or periodic review cycle, and only after ensuring that the proposed framework is consistent with the comprehensive plan (a requirement that clearly cannot be met



here, given that the framework itself reports that the comprehensive plan will need to be amended in order to effectuate the proposed framework).

Finally, Washington Courts have held that when a planning document is inconsistent with the local comprehensive plan, the planning document itself represents a *de facto* amendment and can only be approved in accordance with the GMA. *See, e.g., Alexanderson v. Board of Clark County Commissioners*, 135 Wn. App. 541, 549–550, 144 P.3d 1219 (2006). Here, the proposed framework itself recognizes that, in order to be fully implemented, the county would need to amend not only its comprehensive plan, but also its zoning use table in the Kitsap County Code. Thus, in addition to representing a land use policy document under the GMA, the proposed framework also represents a *de facto* amendment to the comprehensive plan. For this reason, too, the framework can only be adopted on the annual docket or periodic review cycle under the GMA.

Ultimately, the proposed Framework is described as “a long-term vision for one of the largest community parks in the country” and a “visionary yet flexible plan that will guide near-term and long-term decision making.” The language and purpose of the plan, together with the authority cited above, place it squarely within the ambit of the GMA. For the reasons above, the proposed framework can only be adopted in compliance with the procedural and substantive requirements of the GMA, none of which have been followed here.

### C. Conclusion

On behalf of our client, the Kitsap Environmental Coalition, we urge the county to not move forward with adoption of the proposed framework without either (a) strict adherence to the Type-III land use approval process in the Kitsap County Code, and (b) compliance with the substantive and procedural decision-making processes established by the GMA. Whether one or both of these procedures is ultimately used, one thing is clear—the county’s current plan to approve the proposed framework by a simple vote of the Board of Commissioners is illegal.

If you have any questions about this letter, please do not hesitate to contact us at (206) 264-8600 or at [telegin@bnd-law.com](mailto:telegin@bnd-law.com).

Very truly yours,

BRICKLIN & NEWMAN, LLP



Bryan Telegin  
Audrey Clungeon  
*Counsel for Kitsap Environmental Coalition*

[Return to Comment Matrix](#)

8 April 2024

Dear Kitsap County Board of Commissioners,

For the past ten years I have been a resident of Kitsap County. My family and I came to the area as my spouse and I were both active duty officers in the Navy. We have since retired and chose to stay in this amazing, beautiful area. But I am very concerned about the proposed development to the Fisher property in Enetai.

**I am writing to request an immediate moratorium on permit submissions for the Fisher Plat.** This property has critical creeks and steep slopes, with many of the slopes so steep that the ground is severely eroded under the trees. Further studies should be completed to evaluate the critical status of the underlying aquifer and watershed which will reveal if there are any detrimental impacts the proposed development will have to the area.

We moved here to enjoy the beauty of this area and it is under threat. The proposed Fisher property development will completely change not only East Bremerton but the entire county. I have watched my hometown in Idaho grow to be unrecognizable as the open green spaces have disappeared from development. I don't want to see that happen in Kitsap County!

Now is the time to carefully consider if this is really what Kitsap County should allow in this area. The skyline of the Enetai area will forever be changed with the removal of these old trees. With the proposed plan there is literally no room for trees, not to mention the wildlife that lives inside. In fact, the written plan states trees will be removed as "the desirability of lots will be increased significantly if the view potential can be enhanced. . . . Therefore, tree removal is proposed."

The Planning Commission recommends maintaining a tree canopy, but this will no longer exist in the Enetai area. There is no practical way to replace trees over 100 years old. They are gone for good. Even if replaced, the trees will not likely get a chance to mature before they are harvested again. We need to hold on to these mature trees for many reasons, including improved air quality, ground stability, temperature regulation in a warming climate, and sanctuary for all the wildlife that call the forest its home.

Aside from the impact on the watershed, this proposal is simply not the right fit for the area and neighborhood. The proposal is too large and dense for the area



8 April 2024

to support. The increased density would lead to traffic congestion, noise pollution, and add to the strain of public services. As already stated, there will also be significant environmental damage with destruction to natural habitats and put wildlife at risk. This property is home to deer, cyotes, eagles, hawks, golden crowned kinglets, and numerous owls and amphibians; just to mention a few I have personally observed.

Now is the time to consider the impact this proposed development will have on the Enetai community. The Fishers and developers do not live here but WE do!

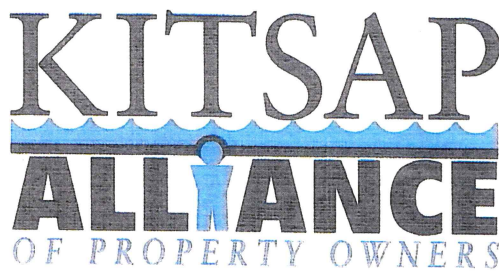
Please do not let the greed determine what happens to Enetai. Greed from the Fishers, Team4, or Kitsap County anticipating the monetary gain of taxable income! Please Put a moratorium on the permitting of this property and allow the appropriate time to evaluate if this is really what is appropriate and necessary in the Enetai Community. Once changed it will forever alter the beauty and habitat it provides.

Thank you for the opportunity to provide input on this important decision.



Nanette K. Brown  
4788 Fir Drive NE  
Bremerton WA 98310

[Return to Comment Matrix](#)



April 10, 2024

Commissioner Charolette Garrido  
Commissioner Christine Rolfes  
Commissioner Katie Walters  
KITSAP COUNTY BOARD OF COMMISSIONERS  
619 Division Street, MS-4  
Port Orchard, Washington 98336

SUBJECT: Fallacy of Expedited Permitting For Multiple Family Residential Proposal  
In the 2024 Comprehensive Plan

Honorable Commissioners:

We in KAPO are well aware that the plan and the program for the 2024 Comprehensive Plan Update is to promote multiple family dwellings over single-family homes. Among other reasons, the one postulated/promoted is the concept that by building more multiple family dwellings in all configurations is a way cure the housing shortage in Kitsap County. Down the road, when there is historical perspective of this plan's provisions for multiple family housing, that goal will be shown as ineffective.

There are many factors/issues with such a proposition that are easily glossed over, which if considered in depth, would lead to the conclusion that the negative consequences associated with this goal out weigh the benefits. But, let's focus on just the mantra about "**expedited permitting**" supposedly proffered as an incentive for developers to create multiple family housing projects. Sorry to bust someone's bubble, but such a suggestion, really cannot be implemented for the following reasons:

1. **There is no definition of what constitutes "expedited permitting."** Once upon a time Kitsap County could process building permits in about 35-days and even issued some permits over the counter. That day is long gone and not likely to be the norm again...Why?.....because Kitsap County's elected and administrative officials have no commitment to make that a goal of the Department of Community Development (DCD). For emphasis, **it is both** the "elected and administrative officials" who lack the commitment. Reason why is explained in the next few points.
2. **Expedited permitting cannot happen without deregulation.** Back in the days before the Growth Management Act, Kitsap County had a zoning ordinance with only 78-pages of regulations, the storm water control ordinance was about 150-  
**"The small landholders are the most precious part of a state." Thomas Jefferson**



pages in length, The Shoreline Master Program was less than 50-pages in length and the subdivision code was similar sized and the short plat ordinance was about 25-pages in length. The Uniform Building Code quite a bit longer but included both commercial and residential provisions (now with the International Building Code, there are two separate codes of nearly equal length).

Compare the Codes Kitsap County has adopted, just since 2,000. The Zoning ordinance is about 400-pages in length (with a 100-pages added in 2022). The storm water regulations to include the design standards is now a two-volume set with over 800-pages of regulatory measures. The subdivision code, now called the Land Division & Development Code includes short plats and sets standards for short plats nearly equal to subdivisions that have to be approved in a public hearing setting. Then there is the Critical Areas Ordinance. Compliance with this ordinance very often requires a decision to be made in a public hearing setting. Finally, for this point, the Shoreline Master Program when adopted in 2014 it was over 300-pages in length counting the appendices.

Pre GMA, planning and regulation in Kitsap County promoted Urban Concentration development in High Urban and Semi-Urban designated areas. Using this plan and just the other ordinances previously mentioned, Kitsap County saw Silverdale become what it is today to include the Ridgeway development. Other projects/developments like McCormick Woods were created in the mid-1970s to 1998 era. Silverdale and the other developments/projects put together back then could not be created today.

3. **Expedited Permit Processing cannot coexist with Critical Areas Ordinance or Shoreline Master Program regulatory measures.** Compliance with the regulatory measures in this ordinance at a minimum requires the engagement of a specialist to prepare a report (which takes time to prepare) and often the pursuit of a variance for the project proponent to seek relief from a set standard (most often a required buffer) are time consuming. Proposal that are processed as a Type II or Type III application takes 9-months to 2-years to get to a decision.

*Note of comparison, prior to 1998 an application scheduled for public hearing approval could be processed in approximately 4-months. Application submittal deadlines (published yearly) were keyed to scheduled public hearing dates. Allowance was made in application processing for a "technical review," the SEPA process and submittal of additional documentation. Still a 4 and maybe 6-month process, not 9-months to 2-years.*

4. **Expedited Permit Processing cannot take place with compartmentalized permit review.** It is not uncommon for one permit reviewer to request information be submitted (in support of a building permit) that has already been provided to the Department in support of a Type II or Type III permit requirement for the same

project. The result is the submittal of duplicate documentation. This was not a circumstance encountered prior to the adoption of “on line application submittal and processing.” Also, this is a problem made worse with administrative staff working from home. It was rarely ever a problem when there was in person application submittal. Result, is a labored time-consuming permit process.

5. **Expedited Permit Processing cannot take place when administrative offices are closed half of the time.** In the days before online application submittal and permit processing, prospective permit applicants could make arrangements to talk to administrative staff (often without an appointment) by coming to the DCD’s office and posing questions to the “planner or building permit technician of the day.” Seldom, if ever, can a citizen make contact with DCD staff by phone on the same day the call is made and in persons visits where eye to eye contact is made are rare. Kitsap 1 staff with no technical or code knowledge is just a referral agency charged with getting the qualified staff to respond to the phone or e-mail inquiry within two-days and often 4-5-days.

Given all of the regulations applicable to any particular project and property on which it is to be built, the delay in getting questions answered in a timely manner can be a “make or break” process as to whether a property owner or developer decides to proceed with a project.

6. **Expedited Permit Processing cannot take place when the permit application fees are beyond the means of the potential applicant.** KAPO in its comments submitted regarding problems with the proposed Critical Areas Ordinance Amendments reported permit application expenses can exceed \$22,000.00. Just this factor alone bodes ill for applicants willing to submit applications for multiple family housing especially if there are storm water control problems, tree preservation, environmental sensitive conditions associated with their site or when there is consideration of rising interest rates on financing.

Perhaps the presumption is that multiple family housing projects will not involve either special reports or public hearing approved variances, thus, the application fees will be less. Unlikely assumption given Kitsap County’s topographic relief and environmental sensitive areas.

The issue is, can the property owner or small builder afford the “price of admission?” Often the answer is no with small builders leaving the County.

Of the foregoing six points listed here, item No. 2 is the one that will be the most problematic in trying to promote an “expedited permit process.” Clearly, Kitsap County has demonstrated on multiple occasions that it is not going to even consider



“deregulation.” In fact, endemic to Kitsap County government is the proposition that “more regulation means a better community.” Thus, commentary like this will not be taken serious as **there is an ardent and steadfast resistance** to even making an analysis of whether or not the County can afford the cost regulation implementation. So, it is **more than likely that Kitsap County will adopt even more regulation, read it to be more stringent regulations.....even before the end of this year.** It is for this reason, above the others, that KAPO concludes “expedited permit processing” is not tenable.

Clearly, there will be some multiple family residential projects built after December of this year, but those that are will not benefit by “expedited permit processing.” Nor will the goal of providing sufficient housing units to cure the deficit, i.e., the housing supply deficit now a problem or that projected over the next 20-years be achieved.

Just think how many more regulation penalties Kitsap County will adopt over the course of the Comprehensive Plan’s planning horizon. Based on the witness of just the last five-years, **there is no limit to the impinging regulations** Kitsap County will adopt.


At some point, given the propensity of the County to embrace greater and more restrictive regulations (not needed) there will be very little development in the County. Even if the Navy decides not to expand in other parts of the County where the appetite for restrictive regulations is small and the communities have far more affordable housing, the County will witness an increasing problem with homeless people.

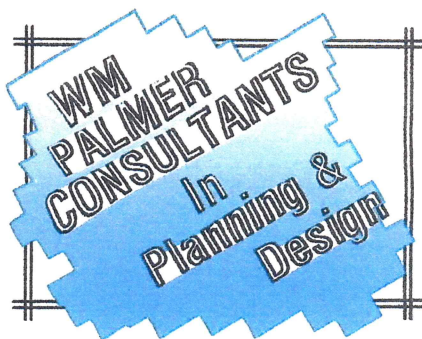
Last point, clearly the price of new homes (even modest sized ones) and apartment rents are now beyond the means of the median income household. This is a point highlighted in KAPO’s critique of the Draft EIS pertinent to the proposed 2024 Comprehensive Plan. The sad commentary is that while **Kitsap County officials know** that 40-50 percent of the cost of a new home or even the rents charged in MFR housing are directly traceable to regulations, **Kitsap County will take no steps to reduce the regulatory environment.** As mentioned above, the County will instead, just keep adding more and more regulations, with a “no-never-mind-attitude” regarding the impact on the price of housing, the length of time it takes to get a building permit or other development permits or the staffing requirements to process applications.

There are, as stated initially, many other issues that could be discussed as to why putting an emphasis long term on multiple family housing is problematic. But at least, the County should be disabused of the notion that “expedited permitting” will facilitate the approval of such projects. That will not happen for the reasons stated herein.

Respectfully submitted,

William M. Palmer, President, KITSAP ALLIANCE OF PROPERTY OWNERS





April 11, 2024

Board of County Commissioners  
KITSAP COUNTY  
619 Division Street, MS-4  
Port Orchard, Washington 98366

SUBJECT: Alternative No. 2's Omission of the Pat and Allyn Arnold Site Specific Plan  
Amendment Application No: 71. Rural Protection to Urban Low

Honorable Commissioners,

Unlike other Rural to Urban Plan proposals this one involved property already subdivided in to 32- 40'x 100' lots. The five plus acres of property has ready access to both public water and sewer. At current platted density, the minimum density in Urban Low would allow for about 27 lots. As stated, the existing plat has created 32-lots. So, this property is not Rural or Rural Protection in nature, it is "urban" in character.

Why this application has been excluded from the "recommended Alternative 2," has not been explained. Based on the presumption that Kitsap County already has enough "urban growth area" allocations, that thesis is not supported when a close analysis is made of the "lost land" due to environmental constraints that are coming with the implementation of the proposed amendments to the Critical Areas Ordinance.

This property should be made a part of the recommended Alternative 2, based on prior platting and close availability of public water and sewer. See attached Vicinity and property map.

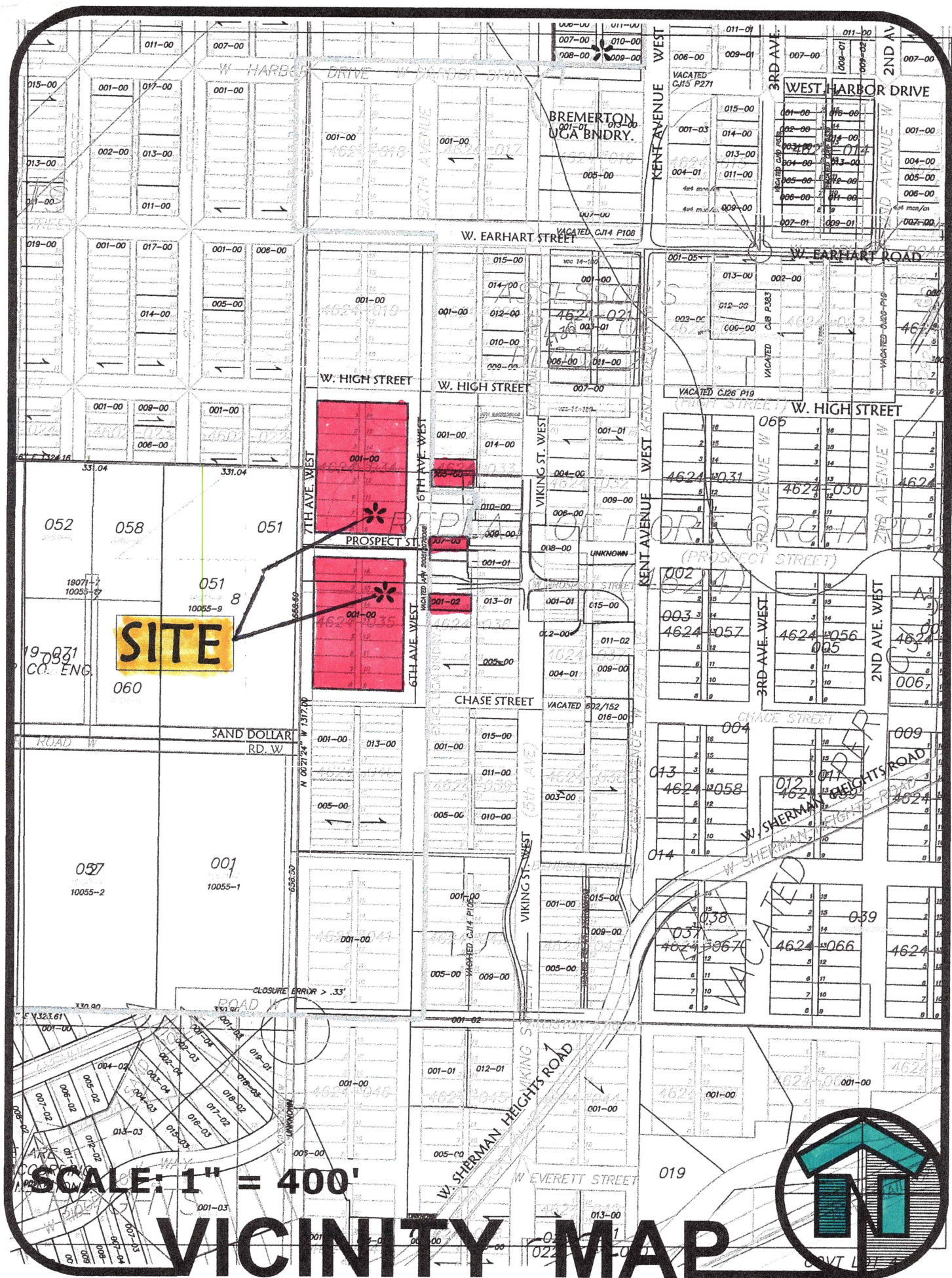
Respectfully submitted,

William M. Palmer  
W.M. PALMER CONSULTANTS

cc.

Pat and Allyn Arnold







W. HIGH STREET

W. HIGH STREET

RP

7TH AVE. WEST

6TH AVE. WEST

VIKING ST. WEST

PROSPECT ST.

051

RP

6TH AVE. WEST

CHASE STREET

DOLLAR  
RD. W

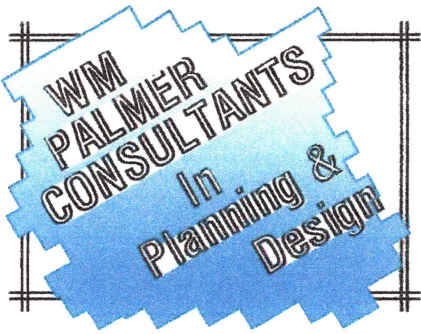
RP  
PROPOSED

SCALE: 1" = 100'

COMP. PLAN & ZONING







April 11, 2024

Board of County Commissioners  
KITSAP COUNTY  
619 Division Street MS-4  
Port Orchard, Washington 98366

SUBJECT: Omission OF Don Proctor's Kingston Site Specific Amendment Request For  
Rural Residential 5-Acres To Urban Restricted in Alternative NO. 2

Honorable Commissioners:

Early in 2022 Kitsap County Staff was touting the proposition that more urban development was needed in the Kingston UGA. Don and Christine Proctor believed their 20-acre property that lies adjacent to the UGA boundary was suitable for such inclusion and thus made application for a Site-Specific Comprehensive Plan Amendment and Rezone. Besides the proximity to the UGA existing boundary and Urban Medium Zoned property, their property lies adjacent to State Route No: 104 and has a preapproved access to the State's road.

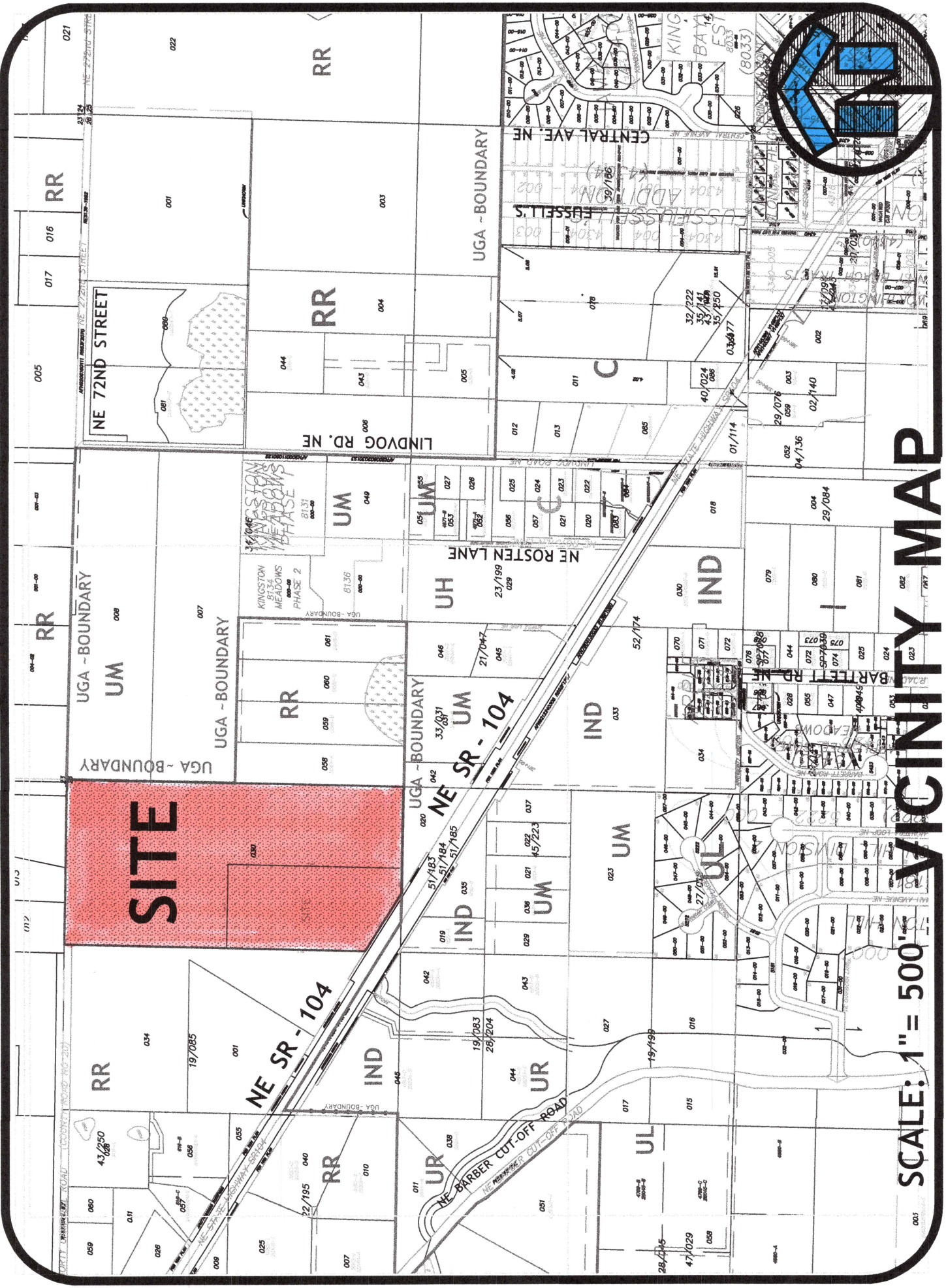
Based on inclusion of the Proctor's property in Alternative No. 3 discussions with adjacent property owners have commenced to proceed with coordinated development. Such discussion is augmented by fact that Alternative No. 2 includes 4-lots currently zoned Rural Residential that abut the Proctors site on the east. (See attached Vicinity and property maps).

The justification for inclusion of the 4-lots mentioned above is just as applicable to the Proctor property. Aside from the fact that the Proctor's request is in keeping with the adjacent Zoning, which is Urban Medium and as proposed Urban Low, there is no reason the Proctor property should be included also in Kingston's UGA, and in the recommended Alternative No. 2.

Respectfully Submitted,

William M. Palmer  
W.M. PALMER CONSULTANTS

NO: 36 - PROCTOR REZONE REQUEST RR TO UL OR UR

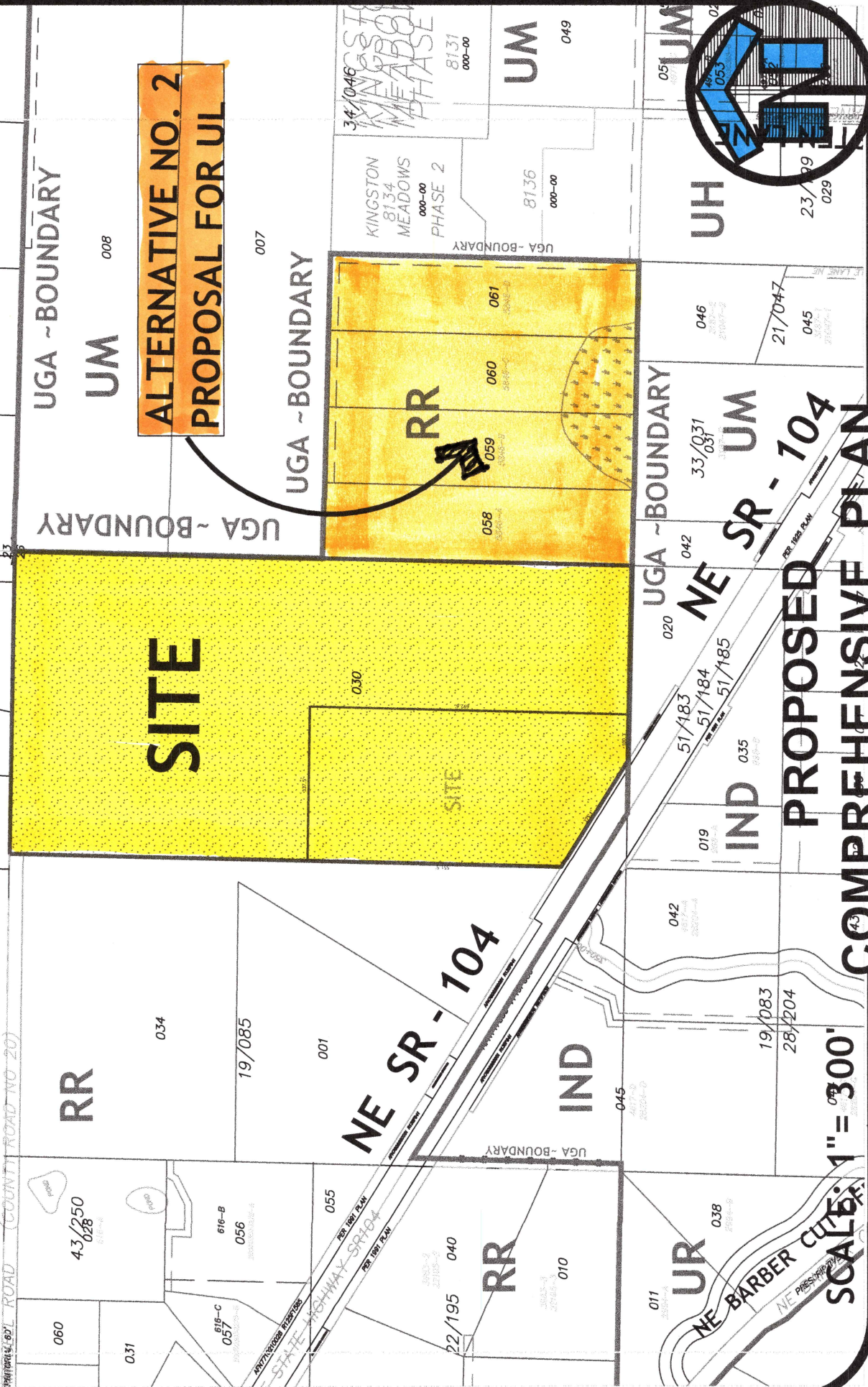


SCALE: 1" = 500'

VICINITY MAP



ALTERNATIVE NO. 2  
PROPOSAL FOR UL



## Engagement deadline extended on Kitsap's Comprehensive Plan

Kitsap County <kitsapcounty@public.govdelivery.com>

To:jackstanfill2@outlook.com <jackstanfill2@outlook.com>

4/11/24

RECEIVED  
EB

[View this as a webpage](#)



## Kitsap County News

I do not support the GMA in the  
Chico Creek watershed until honest FEIS!

April 9, 2024

FOR IMMEDIATE RELEASE

Jackie W. Stoyell

## Kitsap County Expresses Gratitude for Community Engagement in Comprehensive Plan Update

### *Board of Commissioners Extends Public Comment Period*

Port Orchard, Wash. - Last night's public hearing on the Kitsap County Comprehensive Plan update drew approximately 150 people through a combination of in-person and online attendance. Residents provided valuable insights on important topics like housing, the environment, parks and open space, facilities, transportation, and more.



"We're deeply grateful to everyone who contributed to last night's hearing," stated Deputy County Administrator Eric Baker. "Your input is invaluable as we shape policies for sustainable growth that reflect the needs and aspirations of our community."

The 2024 Comprehensive Plan update will determine how the County manages growth and what its direction will be for the next 20 years across policies, zoning, and



4/11/24

RECEIVED

LB

POLLUTIONS CONTROL HEARINGS BOARD  
STATE OF WASHINGTON

JACKIE W STANFILL

PCHB No. 23-019

Appellant,

DECLARATION OF JACKIE W. STANFILL  
IN SUPPORT OF APPELLANTS' MOTION  
FOR A HEARING

v.

STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY,

Respondent

**I. INTRODUCTION**

Appellant Jackie Stanfill, pro se litigant, seeks review by the Pollution Control Hearings Board.

The Washington Pollution Control Hearings Board (PCHB) has jurisdiction over the appeal and they are authorized to hear the Appellant's Case. Ecology's Motion to dismiss this matter before the Washington Pollution Control Hearings Board Hearing should not be dismissed.

**II. STATEMENT OF FACT**

Kitsap County gave Ecology's, Stonecipher, the March 18, 2010, Hearing Examiners Decision.

The March 18, 2010 H.E. Decision pages numbered 1 through 120. **Exhibit A**

The April 28, 2010 Hearing Examiners Reconsideration has pages numbered 1 through 117.

Kitsap Countyt did not provide Ecology with the implemented Hearing Examiner's April 28, 2010. **Exhibit. B,**

1 The Department of Ecology failed to include Appellant's September 30, 2022 email to Ecology.  
2  
3 **Exhibit C.** Appellant Jack Stanfill's true and correct copy of his email to Ecology on  
4  
5 September 30, 2022, "Ueland Soil Manufacturing Site, Water Quality Program:" Appellant  
6  
7 questioned the need for two different Legal Posts for the Ueland Topsoil Manufacturing Site,  
8  
9 especially within three days of each other. Unusual. Ecology's first Public Notice on August 31,  
10  
11 2022, did not include the wetlands and streams. Appellant also included a short explanation to  
12  
13 Ecology of the systemic submission of misrepresented and distorted environmental documents  
14  
15 by Kitsap County. Ecology corrected their error in their second Public Notice posted in the  
16  
17 Kitsap Sun's Legal on September 02, 2022. Appellant did not file an ERTS. Appellant had filed  
18  
19 several ERTS Incidents Reports dating back to 2014:

20  
21 **January 8, 2014: ERTS Incident #646127, Exhibit D.**

22  
23 Ecology, accepted another ERTS from Appellant and documented it as **ERTS #654791. Exhibit E**

24  
25 **ECOLOGY CONFIRMS FIVE (5) YEAR WETLAND DELINEATION REQUIREMENT**

26  
27 **Ecology's Patrick McGranner's** email to Appellant, Jackie Stanfill. **Exhibit F** Mr. McGranner  
28  
29 wrote, "I am forwarding correspondence that I received today as part of my follow-up  
30  
31 investigation of your concerns for the potential impacts to Wetland 4/Dickerson Creek as  
32  
33 outlined in the document you sent to me prepared by Leyda Consulting, Inc., of Bellingham,  
34  
35 WA, dated October 14, 2014. "Furthermore, the Department of Ecology typically only  
36  
37 recognizes wetland boundaries for a period of five (5) years following the verification of wetland  
38  
39 boundary lines...Regardless, this conflict or potential conflict can be addressed at the time of  
40  
41 the Site Development Activity Permit (SDAP) for Quarry C." Email at bottom of Mr. McGranners  
42  
43 email on April 01, 2015, Dennis Oost, Kitsap County, email to, David Greetham, Kitsap County.  
44



1 "Subject: wetland note, fyi Permit 07 44975. Transferred: ATTN: ENVIRONMENTAL REVIEW  
2  
3 STAFF. Upon future SDAP submittals, request reconfirmed wetland buffer flagging for field  
4  
5 inspection prior to construction (originally flagged in 2007). Pay special attention to large  
6  
7 wetland complex north of proposed Quarry C due to headwater function for Dickerson Creek."  
8  
9 Ecology's April 5, 2023, Email from Neil Molstad to Jack Stanfill. "Ecology Sand and Gravel  
10  
11 Hydrogeologist Jay Fennell and I toured the Ueland Tree Farm Property on December  
12  
13 15, 2021.. I am not aware of any ongoing quarry activity within the limits of Quarry A,.." **Exhibit G.** Gravel Mine A and Quarry A Reconnaissance Findings. "Although the  
14  
15 Development Agreement does not require an updated technical wetland report, Kitsap County  
16  
17 has documented their agreement (via email correspondence on June 20, 2019, between Shawn  
18  
19 Alire, Kitsap County, and Kyle Mauren, Contour Engineering."  
20  
21

#### 22 23 CONFLICT OF INTEREST 24

25 Kyle Mauren is Mark Mauren's son. Mark Mauren co-owns UTF and is the Operations  
26  
27 Manager since 2006. Serious conflict of Interest? Soundview Consultants LLC identified Kyle  
28  
29 Mauren,  
30  
31 Engineering Technician, in their publication online in March, 2014, "About Our Staff". The list  
32  
33 included Kyle Mauren's qualifications and work experiences. Exhibit H (page 2&3top. Kyle  
34  
35 Mauren accompanied Ecology to inspect the area of Quarry A and Gravel Mine A  
36  
37 10/24/2021 Appellant email to Neil Molstad, Ecology. Exhibit G, Appellant identified his  
38  
39 concerns about Sound View Consultants, "These are the same people that forced the WDOE to  
40  
41 re-delineate the Upper Heins Creek Basin" southern portion of the UTF – Kitsap County, City of  
42  
43 Bremerton, and Soundview Consultants did not include the 500 acres in the Gorst Watershed  
44

1 Storm Water analysis until Appellant notified the EPA in 2013.

2  
3 **ECOLOGY'S MOLSTAD RECONFIRMS WETLAND 5 YEAR DELINEATION REQUIREMENT**

4  
5 10/25/2021 Neil Molstad email reply to Jack Stanfill, "Hello, You are correct that most federal,  
6  
7 state, and local jurisdiction consider wetland delineations to be valid 5 years. I tried to look up  
8  
9 this project in Kitsap County's online permitting system but could not find it. If you have  
10  
11 a permit number, site address, or some type of additional information that it would be helpful."  
12  
13 Ueland hid the SDAP on page 2 of Mr. Hagsford Logging Permit to log on UTF property as  
14  
15 Appellant reported to Ecology in the original ERTS 710430.  
16  
17 Kitsap County accepted Danny Bates' two conflicting sworn statements and signatures for the  
18  
19 Kitsap Quarry Mining and Kitsap Quarry Dump Truck Traffic. **Exhibit I.**

20  
21 **1. KITSAP QUARRY MINING**

22  
23 Ecology's March 6, 2009, CERTIFIED MAIL, 7008 1140 2360 0404, to Mr. Dan Bates, Rock  
24  
25 Enterprises', Id. "Based on information from you, we are modifying the site specific page of your  
26  
27 General Sand and Gravel Permit to reflect the Facility/Site Status from Active to Inactive" Id. 1.  
28  
29 Section 2 - Change in the Site Activity Status. Mr. Bates marked an X in the block titled, Active to  
30  
31 Inactive on 5-31-06. Id.2. "While inactive, will raw material or finished products be added, or  
32  
33 withdrawn from stockpiles?" Mr. Bates answered "No", and marked an X in that box labeled, No.  
34  
35 "XI. CERTIFICATION BY PERMITTEE: I certify under penalty of law that I have personally  
36  
37 examined and am familiar with the information submitted in this application and all  
38  
39 attachments, ...I am aware that there are significant penalties' for submitting false information,  
40  
41 including the possibility of fine and imprisonment." Mr. Bates signed his name on 6/30/09 Id. 6.  
42  
43 "IX. FACILITY ACTIVITY STATUS, 1. What will your facility's status be on February 4, 2010?"  
44

1 There is an "X" in the box designated "Inactive" Id.99. .

2  
3 Ecology's proof of Registered Mail delivered to Mr. Dan Bates, and his acceptance to same.

4  
5 2. DUMP TRAFFIC ON WEST KITSAP LAKE ROAD

6  
7 **Exhibit J, Kitsap Quarry Administrative Appeal #20-02990 before the Kitsap County Hearing**

8  
9 Examiner, DECLARATION OF DAN BATES. Exhibit ????. "I, Dan Bates, declare under penalty of  
10 perjury

11  
12 under the laws of the State of Washington that the following is true and correct: I am the

13  
14 former owner of Kitsap Quarry. I purchased Kitsap Quarry from Richard Martin in August 2003

15  
16 and owned it under the legal name of Rock Enterprises until I sold it to Bremerton West Ridge

17  
18 (BWR) in APRIL 2012. During the nine years I owned Kitsap Quarry, I mined and sold

19  
20 aggregates to external customers...As is typical with rock quarries, the volume sold fluctuated

21  
22 from year to year depending on the economy, but the quarry was active each and every year."

23  
24 Mr. Bates's either perjured himself stating the Kitsap Quarry was Inactive as his sworn

25  
26 statement in 2006, or he perjure himself when he swore in 2012, "During the nine years I

27  
28 owned Kitsap Quarry, I mined and sold aggregate to external customers". **§RCW 40.16.030, and**

29  
30 **§RCW 9A.84.040.**

31  
32 **TWO WETLAND SCIENTISTS QUESTION VALIDTY OF KITSAP COUNTY'S UELAND EIS**

33  
34 Appellant asserts that Washington Department of Ecology violated §RCW 43.21C.030 (?)(!) by

35  
36 their early closure of ERTS 710430 ON APRIL. 06, 2023. The Department of Ecology (DOE) failed

37  
38 to review the three (3) professionals' scientific reports -- that contained information, data, and

39  
40 records, provided to them by Appellant:

41  
42 Two Wetland Scientist reviewed Wetland 4 and Wetland 6 Ueland Tree Farm Mineral

43  
44 Resource/ Joseph D. Leyda, MA Professional Wetland Scientist, Certified Ecologist, RE: Mineral



1  
2 Resource Development Wetland Review, Ratings, and Impacts Ueland Tree Farm, Kitsap County,  
3  
4 Washington.

5  
6 Professional Wetland Scientist, Dr. Sarah Spear Cooke, Ph.D., Wetland Ecologist, Soil Scientific,  
7  
8 Plant Ecologist and Taxonomist, RE: Chico Creek/ Ueland Tree Farm..Report Third Party Review,  
9  
10 March 3, 2015, Cooke Scientific, Dr. Sarah  
11  
12 Spear Cooke, RE: Kitsap Quarry.

13  
14 Dr. Sarah Spear Cook, Cooke Scientific Third-Party Review, August 14, 2017. RE: Kitsap Quarry  
15  
16 Expansion Road.

17  
18 **FALSE REPORTING**  
19

20  
21 **Exhibit H**, Kitsap County approved the Final Environmental Impact Statement for the Ueland  
22  
23 Tree Farm Mineral Resource LLC., Conditional Use Permit No. 07– 449975, April 2010, **Exhibit B**  
24  
25 October 5, 2010, Kitsap County Commissioner, Josh Brown, who was campaigning for Re-  
26  
27 election of District 3, needed an explanation of how Wetland 4 became a part of Wetland 6 –  
28  
29 his jurisdiction. “Kitsap County Press Release, FOR IMMEDIATE RELEASE, October 6, 2010:  
30  
31 Wetland Information assessed for proposed Ueland Mine...” “The new Information clarifies how  
32  
33 the area formerly identified as “Wetland 4” on earlier maps is a part of a larger wetland area  
34  
35 now referred to as “Wetland 6 Complex”.

36  
37 **September 30, 2010**, Phil Struck, Parametrix UTF Project Engineer, replied to Mark Mauren/UTF  
38  
39 Request. Their actions violates **40.16.030** and **§ RCW 9A.84.040**.

40  
41 **October 6, 2010**, 8:30 AM, Board of Commissioners Work Study Session, Page 2, Kitsap County  
42  
43 Department of Community Development (DCD), Director, Larry Keaton, announced the  
44



1 October 6, 2010 imminent press release.

2  
3 **October 6, 2010 Press release** one-month before Kitsap County Commissioner Democrat

4  
5 incumbent, Josh Brown, campaigned for the November Election in 2010. Commissioner Brown  
6  
7 won a second term. Appellant asserts that Kitsap County's distorted and misrepresented press  
8  
9 release violated §RCW40.16.030 and §RCW9A.84.040.

10  
11  
12 October 14, 2012, Leyda Consulting Inc., Joseph D. Leyda, Professional Wetland Scientist,  
13  
14 Certified Ecologist. *RE: Mineral Resource Development Wetland Review, Ratings, and Impacts*  
15  
16 *Ueland Tree Farm, Kitsap County, Washington*. "Introduction and Background. There is some  
17  
18 ambiguity surrounding the name of the beaver pond wetland created in Dickerson Creek north  
19  
20 of Quarry C. In an email from Phil Struck of Parametrix to Mark Mauren, forwarded to Dave  
21  
22 Greetham of Kitsap County, dated 10/1/2010..,"

23  
24 Entire Page 2 of 23 Mr. Leyda explains the Wetland 4 and Wetland 6

25  
26 Confusion. "The proposed quarries are shown in the project documents at a different distance  
27  
28 from Wetland 4. Wetland 4 is shown on Figures 1-2 and 3-1 of the wetland delineation report,  
29  
30 and appears to be approximately 120 feet from the north edge of Quarry C when measured on  
31  
32 Figure 1-2. This differs from the Mineral Resource Development and Preliminary engineering  
33  
34 package received by Kitsap County on August 5, 2011 as a permit application submittal, which  
35  
36 shows Wetland 4 as 200 feet from the proposed quarry on sheet C11. Page 3, p1. I.d. However  
37  
38 Wetland 4 was omitted from the discussion in the wetland delineation report, was not rated,  
39  
40 an no data from Wetland 4 was present to establish the boundary as shown. In the absence of  
41  
42 recorded data, it is unclear how the boundary of Wetland 4 was determined in the Parametrix  
43  
44 report. Page 3 of 23, I.d. ?? Page 23 of 23, "For these reasons, LCI recommends additional

1  
2 review and analysis of the issues by the County and applicant prior to the applicant receiving a  
3  
4 SDAP.” Joseph Leyda, Wetland Scientist, exposed, and certified, the travesty of the new  
5  
6 “Wetland 4” delineation submitted to Kitsap County by Phil Struck, Parametrix Inc.  
7  
8 Dr. Sahra Cooke, Cooke Scientific, Seattle WA. RE: Chico Creek/Ueland Tree Farm HMP and  
9  
10 Wetland Report Third Party Review, “Dear Mr. Stanfill, I have prepared the 3<sup>rd</sup> party review and  
11  
12 analysis for the proposed Ueland Tree Farm, LLC’s mineral mining application at your request. I  
13  
14 was asked to review the documents listed below identifying any comments, questions, and  
15  
16 discrepancies I find in the files.” Ueland Tree Farm Project Resource Reviewed:” The first  
17  
18 documents reviewed was, “Leyda June 2012. Draft Ueland Tree Farm. Draft Mineral Resource  
19  
20 Development Wetland Review, Ratings, and Impacts: Ueland tree Farm, Kitsap County June 4,  
21  
22 2012 to Chico Creek Task Force”. The 10<sup>th</sup> document reviewed was, “WA State Department of  
23  
24 Ecology (Stephen Stanley, Susan Grigsby, Kelly Slattery) August 2013. Final Revised Water Flow  
25  
26 and Water Quality Assessment for Gorst Watershed.”  
27  
28 “Although the adequacy of the original EIS was upheld in Superior Court, and the Supplement  
29  
30 EIS submitted only addresses the new access route for the project, there are issues that have  
31  
32 still not been resolve that pertain to the original project that the new EIS still failed to address.  
33  
34 The major issue pertains to “Wetland 4” EXHIBIT page 1, I.d. Dr. Cooke.  
35  
36 August 14, 2017 Dr. Sarah Cooke, Cooke Scientific RE: Kitsap Quarry Expansion Service Road  
37  
38 Installation. Third Party Review. Dear Mr. Stanfill I have prepared the third party review and  
39  
40 analysis for the proposed Kitsap Quarry expansion Service Road...” Exhibit K

41  
42 **Closure of ERTS Report is Subject to Review by the Board**

43  
44 **2022 -Department of Ecology Incident Attachments ERTS. 710430. Ecology wrote, “Re ERTS**

1  
2 710430. Set 3 .msg. Follow-up information from the reporting party received 11/18/21  
3  
4 Reporting party advised of relation to complaint filed in 2015. **(ERTS)654791.” EXHIBIT ?.**  
5  
6 The Appellant exposed distorted and misrepresented environmental impact reports in the  
7  
8 Ueland Tree Farm Mineral Resource’s Draft and Final Environmental Impact Study. All permits  
9  
10 are tied to the parent document, Conditional Use Permit (CUP) 07 – 449975.

11  
12 **Stonecipher wrote,** “ERTS is merely a communication tool to increase the efficiency reporting  
13  
14 and inspecting instances of potential pollution” “There is no legal obligation imposed on  
15  
16 Ecology to issue a penalty, keep an ERTS report open indefinitely, or even respond to an ERTS  
17  
18 report in the first place. In fact, there is no legal obligation for Ecology to maintain the ERTS  
19  
20 system at all.” Ecology’s statement shocked Appellant! The ERTS program is no more than a  
21  
22 paper shuffling operation. Sounds more like waste, fraud, and abuse, than an Agency to  
23  
24 to protect and serve the public. Appellant has worked with the ERTS system for over ten (10)  
25  
26 years.

27  
28 Appellant asserts the Washington Department of Ecology knew, or should have known, that  
29  
30 Kitsap County had accepted invalid documents submitted in, and with the Conditional Use  
31  
32 Permit (CUP) **CUP 07-449975.**

33  
34 **Conditional Use Permit No. 07-449975 CUP invalid IAW RCW 19.27.095, Exhibit 6.**

35  
36 **“Building permit application containing misrepresentations does not vest,** Lauer v. Pierce  
37  
38 County, 173 Wn.2d 242 (2011), overruling Lauer v. Pierce County, 157 Wn. App. 693 (2010) –  
39  
40 The court concluded that the applicant’s 2004 building permit application, which contained  
41  
42 knowing misrepresentation and omissions of material fact, did not vest because it was not valid  
43  
44 and did not comply with the regulations at the time it was submitted.”



1 The Ueland Tree Farm Mineral Resource LLC. Development is built on:  
2  
3 WAC 197-11-080 Incomplete or unavailable information, (1), (2), (3)(a)(b).  
4  
5 RCW 40.16.030, Offering false instruments for filing or record.  
6  
7 RCW 40.16.020, Injury to and misappropriation of record.  
8  
9 RCW 43.21C.030, Guidelines for state agencies, local governments—Statements—Reports—  
10  
11 Advice—Information.  
12  
13 WAC 371-08-365, Persons who May appear before the board. (1). Any person has the right to  
14  
15 represent himself or herself in a proceeding before the board.  
16  
17 WAC 371-08-305 Definitions. (8) "Party means: (a) A person to whom any agency decision is  
18  
19 specifically directed; (9). "Person" means any individual,..."  
20  
21 Appellant is the party to whom Ecology's decision was specifically directed. Ecology closed ERTS  
22  
23 710430 based on the word of Kitsap County and Ueland Tree Farm employees and a family  
24  
25 members employed by Soundview Consultants.  
26  
27 It's almost impossible to accurately determine the damages to our community until an honest  
28  
29 Environmental Impact Study is completed by a third-party.  
30  
31 The Ueand Tree Farm Mineral Resource LLC. and Kitsap County have weaponized Outdoor  
32  
33 Recreation against me. This includes the critical needed North-South Connector Non-Motorized  
34  
35 Trail that was planned across UTF.  
36  
37 Appellant asserts that a hearing before the Pollution Control Hearings Board is the only solution  
38  
39 to stop the graft and willful destruction of our Kitsap County environment.  
40  
41  
42  
43  
44

[Return to Comment Matrix](#)

Jackie W Storgel  
4-11-24